Gloucestershire COUNTY COUNCIL


# Issues and Options

*for the*

# Waste Core Strategy

# Part B
# Explanatory Paper

**July 2006**

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## Summary of the Waste Core Strategy Issues & Options Document

S.1 The Waste Core Strategy (WCS) is a strategic level document that will provide the planning framework for sustainable waste management in the County over the next 10 to 20 years. The Issues and Options consultation is comprised of three documents: Part A (a summary version for stakeholder consultation, including questions related to the issues set out in Parts A & B); Part B, which is this document, that sets out in a more detailed form the context and issues for waste management planning in Gloucestershire. And thirdly a standard form for making representations that contains a set of questions (available at council offices, libraries or by contacting the Minerals & Waste Policy Team on 01452 425704).These documents are the first step in preparing a WCS under new planning regulations.

S.2 The WCS will contain a spatial vision for managing waste in Gloucestershire, which will be backed up by objectives to achieve it. In turn these will form the basis for preparing policies and a framework for identifying sites for waste management facilities. The WCS however is not site specific. Sites for waste management facilities will be allocated in a separate site specific document to be prepared following adoption of the WCS.

S.3 The WCS covers different types of controlled waste: municipal solid waste (MSW- produced by households); commercial & industrial waste (C&I); and construction & demolition waste (C&D). In addition, there are hazardous wastes, which are likely to come from the three main waste 'streams'. And there are agricultural wastes that are in the process of coming under planning control.

S.4 The purpose of this issues and options document is to generate discussion about what sustainable waste management means for Gloucestershire. We want to hear your views and opinions on what factors should comprise an appropriate strategy for managing all different types of waste. This will help to shape the way the County manages its' waste in the future.

S.5 The document contains three contextual sections: firstly the county background (Section 2); secondly the land-use planning framework in which the WCS must be prepared (Section 3); and thirdly the background to Gloucestershire's waste operations, including waste data (Section 4). The issues that arise as a consequence of this context are presented in Section 5. Questions to stimulate debate about possible options for addressing these matters are provided on a separate consultation form, which is reproduced as an appendix in both Parts A & B.

S.6 Based on the most recently available data, around 1.37 million tonnes of controlled waste was managed in Gloucestershire (2002/03). The summary table below shows how this is broken down by waste stream. The figures are for the most up-to-date year available for that 'stream' and are presented in thousands of tonnes.

| Summary Table - Waste Management in Gloucestershire ('000 tonnes) | | |
|---|---|---|
| **Waste Stream** | **Base Year** | **Total** |
| MSW | 2004/05 | 309 |
| C&I (including metals) | 2002/03 | 599 |
| C&D | 2002/03 | 418 |
| Hazardous | 2003 | 46 |
| **Total** | | **1,372** |
| Agricultural | 1998 | 1,116 |

S.7 Additional facilities to manage this waste are likely to be required during the next 10-15 years (Table 23 sets out requirements). These are for: composting mixed organic waste (in-vessel); recycling (transfer/bulk-up) source segregated materials; treating biodegradable waste (to process all non-compostable/recyclable wastes prior to final disposal); and possibly additional landfill capacity.

S.8 The key issues for waste management in Gloucestershire are summarised in the diagram below. These are not intended as a definitive list. We encourage you to contribute your thoughts on what other key issues might be, and options as to how they can be addressed.

**Key Issues for the Waste Core Strategy**

W1. Setting an appropriate spatial vision and objectives for the WCS;

W2. Determining the time period over which the WCS operates;

W3. Implementing the waste hierarchy - reducing the amount of all types of waste we produce, but where waste does arise to increase recycling and divert it from landfill;

W4. Adopting a strategy for making appropriate provision for waste management facilities;

W5. Setting out a spatial strategy - selecting criteria to use for identifying suitable sites for waste management operations;

W6. Implementing the Joint Municipal Waste Management Strategy (JMWMS) for Gloucestershire's household waste;

W7. Determining what factors should be used in assessing the cumulative impact on local communities;

W.8 Making an appropriate contribution to local, regional and national hazardous waste management requirements;

W9. The appropriateness of proposals for new waste management facilities in the Green Belt;

W10. Policies for dealing with proposals for new waste management facilities in other nationally designated areas;

W11. Strategic Environmental Appraisal and Sustainability Appraisal;

W12. Are there any other key issues that need to be included?

S.9 The following provides a brief summary of each of the issues for which the full discussion is contained in Section 5:

W1. The WCS is required to set out a **spatial vision** as to how we want to manage our waste. Objectives will stem from this vision. Key elements to consider are: driving waste management up the hierarchy; taking responsibility for managing the waste produced in the county; and safeguarding Gloucestershire's environment, including its residents, from the adverse impacts of waste management.

W2. It is important to clearly define the **time period** over which the waste development plan documents are to operate as this will impact on the capacity for which provision needs to be made. Options include looking at least 10 years into the future, but potentially coinciding with regional guidance (up to 2026) or nationally derived target years (2020).

W3. The **waste hierarchy** is central to sustainable waste management. The hierarchy should provide the basis for determining which mode (re-use, recycling, recovery, disposal) is the most appropriate for dealing with particular wastes. Preventing waste from arising is a priority. But there is also an issue concerning how the 'need' for a proposal is considered – for example communities taking responsibility for their own

waste and the use of legal agreements to secure appropriate waste management facilities in new development.

W4. The WCS needs to contain a **provision strategy** for delivering sustainable waste management in the County. This must be based on national and regional planning guidance. Options relate to the degree of rigidity or flexibility that is built into the planning documents in terms of the type of operation and size of site needed for particular uses.

W5. The WCS does not identify particular sites. Instead it provides the **criteria for identifying sites** in a subsequent document, to be prepared once the WCS is adopted. This 'spatial strategy' needs to take into account 'locational' issues, for example: town versus rural locations (including green belt issues); small (local) versus larger (strategic) facilities; central versus dispersed locations; existing versus new locations. These, and other issues such as transportation, must be considered and then balanced in determining appropriate locations for waste management facilities.

W6. The **Joint Municipal Waste Management Strategy** (JMWMS) will set out the County's strategy for managing MSW. It is currently being prepared by the Gloucestershire Waste Partnership (GWP), consisting of the six District Councils and the County Council. The WCS will implement the JMWMS in terms of providing the framework for identifying suitable sites for the stated facility types that will be required. The approach to making 'provision' needs to be in conformity with National policy and the Regional Spatial Strategy (RSS).

W7. There is a need to consider the **cumulative impact** of waste operations on the well-being of local communities. This is to be measured through consideration of environmental quality, social cohesion and inclusion, and economic potential. Quantifying these elements will inevitably contain subjective aspects and may prove to be difficult to define. By setting out the criteria in a policy framework this will provide a tangible set of factors against which 'cumulative impact' can be assessed. This however needs to be balanced against co-locating similar operations together in resource recovery parks.

W8. **Hazardous wastes** arise all across the country, including in Gloucestershire. These tonnages are relatively small and there are limited facilities nationally serving a wide market area. The WCS needs to provide a criteria based policy approach for assessing the suitability of any future planning applications for facilities to manage hazardous wastes. An overarching factor being the issue of making appropriate provision in Gloucestershire. This will include an assessment as to whether existing hazardous waste sites are 'environmentally acceptable' should they require a renewed or revised planning permission.

W9. There have been changes to national planning policy concerning waste facilities in the **Green Belt**. A key objective of PPS10 is to *protect green belts but recognise the particular locational needs of some types of waste management facilities*. In doing so there is a need to consider the *wider environmental and economic benefits of sustainable waste management*. In Gloucestershire the Green Belt covers a significant amount of land between the main urban areas of Cheltenham and Gloucester and therefore has potential to restrict opportunities for waste management facilities. The WCS needs to reflect the revised Government policy in terms of providing an appropriate policy for Gloucestershire.

W10. To achieve consistency in the WCS it is proposed to review policies relating to **nationally designated areas** from the adopted Waste Local Plan. These are: Internationally and Nationally Designated Sites for Nature Conservation (Policy 23); Areas of Outstanding Natural Beauty (Policy 26); Sites of National Archaeological Importance (Policy 28); and the water environment. Locally designated areas and operational issues will be dealt with in a subsequent Development Control Development Plan Document.

W11. An appraisal of the potential social, economic and environmental impact issues and options has been undertaken through the SA process. The SA should inform and influence the development of plans early in the process with the aim of making them more sustainable. The SA involves gathering evidence and building a framework against which plans can be tested.

W12. This issue is intended to highlight to stakeholders that the key issues/options are provided to form the basis for **stimulating public debate**. The opportunity is there for people to raise any matters that they feel pertinent at this early stage in the WCS preparation process.

***How can you get involved in the WCS preparation?***

S.10 The adopted Minerals and Waste Development Scheme (M&WDS) provides the timetable for preparing the WCS. In addition, our vision and strategy for engaging with the community is detailed in the adopted Statement of Community Involvement (SCI, December 2005). These two documents in combination set out the arrangements, for preparing the WCS. The key milestones are:

| | |
|---|---|
| **July 2005** | **Begin Preparation of WCS** |
| **Ongoing** | **Evidence gathering & data provision by the EA** |
| **December 2005** | **Newsletter for stakeholders** |
| **March 2006** | **Stakeholder forum (jointly with Waste Management)** |
| **July 2006** | **Consultation on Issues and Options** |
| **Autumn 2006** | **Consideration of representations made during public consultation, and second consultation on additional Issues & Options if required.** |
| **Spring 2007** | **Consultation on Preferred Option for the WCS** |
| **Winter/Spring 2008** | **Submission of WCS to Secretary of State** |
| **Autumn 2008** | **Independent Examination** |
| **Spring 2009** | **Adoption of WCS** |

S.11 Please let us know what you think of the issues and options presented in Parts A & B by completing the standard response form and returning it to us **15th September 2006**. You can:

- Fill in the standard response form available at council offices, libraries or by contacting the Minerals & Waste Policy Team on 01452 425704 (the questions that it contains are listed at the back of this document); or
- E-mail us at m&wplans@gloucestershire.gov.uk; or
- Write to us at Minerals & Waste Planning Policy, Environment Directorate, Gloucestershire County Council, Shire Hall, Gloucester GL1 2TH

S.12 Your comments will be used to help us decide on the approach we should be taking to planning for waste developments in the Preferred Options document. A report summarising the responses made to the WCS Issues and Options will be published following the consultation process. Subject to the outcomes of this community engagement we will be working towards the preparation of the Preferred Option WCS.

S.13 More information on the minerals and waste development framework can be found on the County Council's website **www.gloucestershire.gov.uk**. Alternatively if you would like to speak to an officer involved in the preparation of the framework, please telephone Council Direct on 01452 505345.

# Contents

# Section 1
# Introduction to the Waste Core Strategy

1.1 The Waste Core Strategy (WCS) is a strategic level document that will provide the planning framework for sustainable waste management in the County over the next 10 to 20 years. The Issues and Options consultation is comprised of three elements:

- **Part A** (Consultation Version) a summary version for stakeholder consultation, including questions related to the issues set out in Parts A & B;
- **Part B** (Explanatory Paper) setting out in a detailed form the context and issues for waste management planning in Gloucestershire; and
- **Standard Form** containing questions relating to the issues set out in Parts A and B.

1.2 These issues and options documents are the first step in preparing a Waste Core Strategy[1] (WCS) for Gloucestershire. The documents are not site specific. Instead they identify important strategic issues on which we are seeking stakeholders' views. This will help to shape the way the county spatially manages its' waste in the future. The purpose of this Part B issues and options document is to provide the technical context relating to what sustainable waste management means for Gloucestershire.

1.3 The introductory section of Part B is followed by the county background (Section 2). Section 3 then details the land-use planning context in which the WCS must be prepared. Section 4 provides the background to Gloucestershire's waste operations, including waste data. This leads into a discussion in Section 5 of the issues that arise as a consequence of this position. Options for addressing the issues are presented, as questions on the standard form (available separately), which for ease of reference are listed in Appendix E.

***Waste as a Resource***

1.4 Waste starts out as a resource, often naturally derived, which is unlikely to be renewable e.g. mineral, oil or metal. Economic growth and greater consumer consumption has led year on year to a growth in waste production. Simultaneously this has resulted in resource depletion, exacerbated by unsustainable waste disposal practices. The Government's stated aim is to break this link between economic growth and the environmental impact of waste.

1.4 Currently a significant amount of waste which could be re-used or recycled is dumped into landfill sites. For many it is the case of out-of-sight and out-of-mind. This puts additional pressure on resources, which could otherwise be offset by reuse or recycling of waste. Waste therefore needs to be considered as a resource, rather than something which is to be discarded.

1.5 Proposals for waste related development often receive opposition from residents and businesses in their vicinity. To overcome this, greater awareness of the waste industry, confidence in the regulatory authorities and communal ownership of waste is required. A key aspect for this WCS is fostering this ownership whilst providing the framework for determining planning applications.

***The Role of Public Organisations***

1.6 There are a variety of bodies that are involved with managing waste, the roles and responsibilities of these organisations is set out in Table 1.

[1] The Waste Core Strategy (WCS) was formerly referred to in the Minerals & Waste Development Scheme as Waste Management Core Strategy (WMCS), however, to avoid confusion with the Municipal Waste Management Strategy the document's name has been shortened.

| Table 1 - The role and responsibilities of the public bodies involved in the management of waste. | |
|---|---|
| **Authority** | **Function** |
| **County Council** (As Waste Planning Authority) | • Prepares waste related development plan documents for the Minerals & Waste Development Framework for Gloucestershire.<br>• Carries out Development Control: - determines planning applications; monitors and enforces planning controls. |
| (As Waste Disposal Authority) | • Lets contracts for the management of waste collected by WCAs (see below).<br>• Provides facilities for management of bulky household waste and recycling.<br>• Undertakes 'Closed Site' management for sites previously operated by the County Council.<br>• Prepares Municipal Waste Strategy (jointly with the Waste Collection Authorities). |
| **District Councils** (As Waste Collection Authorities) | • Collect household waste and transport to waste management facilities.<br>• Prepare recycling plans.<br>• Run recycling facilities.<br>• Collect (at a charge) business and commercial waste. |
| **Environment Agency** (As Waste Regulation Authority) | • Regulates management of waste from production to disposal through a licensing system.<br>• Provides data on waste arisings.<br>• Has responsibility for protecting and improving rivers and groundwater.<br>• Advises on National Waste Strategy and its implementation.<br>• Provides advice on individual planning applications as a Statutory Consultee.<br>• Advises on the preparation of the RSS. |
| **State Veterinary Service and Trading Standards** | • Advises, licenses and regulates facilities for composting mixed organic waste that contain animal by-products, for example catering waste, kitchen / supermarket meat wastes. |

***The Changing Planning System***

1.7 The planning system has recently undergone its most significant change in fourteen years. The Planning and Compulsory Purchase Act came into effect in September 2004. It replaces the present system of Minerals and Waste Local Plans (MLP and WLP) with a Minerals and Waste Development Framework (M&WDF).

1.8 This Waste Core Strategy (WCS) document relates specifically to waste issues. Its' sister document, dealing with minerals (called a Minerals Core Strategy), is being prepared at the same time and you may also wish to view that document.

1.9 At present, under transitional arrangements[2] contained in the 2004 Act, the waste planning in Gloucestershire follows the 'old style' planning system. This two-tier framework of development plans, prepared by the County Council in its role as Waste Planning Authority (WPA), comprises:

- **Structure Plan (Second Review)**, covering strategic issues and broad locational principles;
- **Waste Local Plan 2002-2012 (WLP, adopted October 2004)**, containing detailed policies and site-specific allocations.

[2] The phrase 'transitional arrangements' relates to what happens during the interim period between the introduction of the new planning Act and the adoption of new planning documents. For Gloucestershire this means that the adopted WLP is operative until at least Sept 2007 (3 years from the introduction of the new Act). In reality it is likely that for many policies and site allocations in the WLP this period will be extended until at least 2010 due to the timescales for revising/preparing the new documents – please refer to the Minerals & Waste Development Scheme for the adopted timetable.

1.12 The 'new style' planning system will now consist of:

- **Regional Spatial Strategy** (RSS), prepared by the South West Regional Planning Body containing regional and sub-regional strategies and policies; and

- **Local Development Plan Documents (LDD)** prepared by District Councils and in the case of minerals and waste development plan documents by County Councils. The LDDs will be guided by the RSS. The minerals & waste LDDs are incorporated within the M&WDF.

1.13 The WPA is charged, in the first instance, with preparing a Waste Core Strategy (WCS). This will be followed in due course by a Site Allocation DPD and a Development Control Policies DPD (see paragraph 1.15). In addition, supplementary planning documents may also be prepared. Together with the Minerals component these will comprise the M&WDF, a folder of documents that will be flexible, responsive and speedily prepared.

***What will feature in the Waste Core Strategy?***

1.14 The WCS needs to set out strategic policies and proposals for sustainable waste management in line with the RSS. The WCS will be prepared in accordance with the adopted Regional Waste Management Strategy 2004-2020 (RWMS) and new national waste planning guidance. The preparation of the RSS is underway and the preparation of the WCS will need to take into account the submission of the RSS to the Secretary of State in March 2006, and its subsequent adoption in 2007/08.

1.15 The WCS should:

- Contain a spatial strategy including core policies and proposals for Gloucestershire (as a sub-region);
- Be in line with the RSS;
- Inform and be informed by the JMWMS;
- Guide the provision of waste management facilities in appropriate locations by setting the framework for preparing a Site Allocations DPD;
- Provide at least a 10 year horizon from adoption (including an approximate assessment beyond that to tie in with the RSS);
- Set out guidance for the Development Control DPD (see note below).

[Note: The Development Control DPD will set out detailed policies for determining planning applications. These will deal with locally designated areas, such as key wildlife sites, regionally important geological sites, conservation areas etc and also operational matters such as pollution control and traffic issues as well as policies designed to safeguard amenity. Until this DPD is prepared it is anticipated that the saved policies of the adopted WLP will provide the context for determining planning applications.]

1.16 The WCS should not:

- Contain site allocations or be site specific;
- Re-open the debate from the RSS concerning annual tonnages of waste to be managed;
- Re-open debate concerning RSS policies;
- Re-open debate about the preferred options for managing MSW contained in the adopted municipal waste management strategy.

1.17 Gloucestershire County Council is the waste planning authority (WPA) with responsibility for making provision for managing all waste streams (as set out below) that fall under planning control. Controlled waste is categorised into four 'streams':

- **Municipal Solid Waste** (MSW) – household waste, street sweepings, and a small amount of commercial waste collected by district councils;
- **Construction and Demolition Waste** (C&D) – generated on building sites;

- **Commercial and Industrial Waste** (C&I) – produced by businesses, shops, manufacturing industries etc;
- **Hazardous Waste** – examples include electrical items, batteries, asbestos, incinerator fly-ash, and contaminated soils.

1.18 In 2006, **agricultural wastes** will become controlled. This will mean that waste disposal or recovery on farms will no longer be possible without a landfill permit, a waste management licence or a registered exemption from waste management licensing (depending on what the farmer does with the waste). The impact that this has on land-use planning however remains uncertain.

1.19 This WCS consultation document sets out the waste related issues that face Gloucestershire over the next 10-20 years. It then offers possible **alternative approaches** for addressing them. These are by no means the only options. Other strategies for managing our waste that are put forward by stakeholders and the community through this consultation process will also be considered.

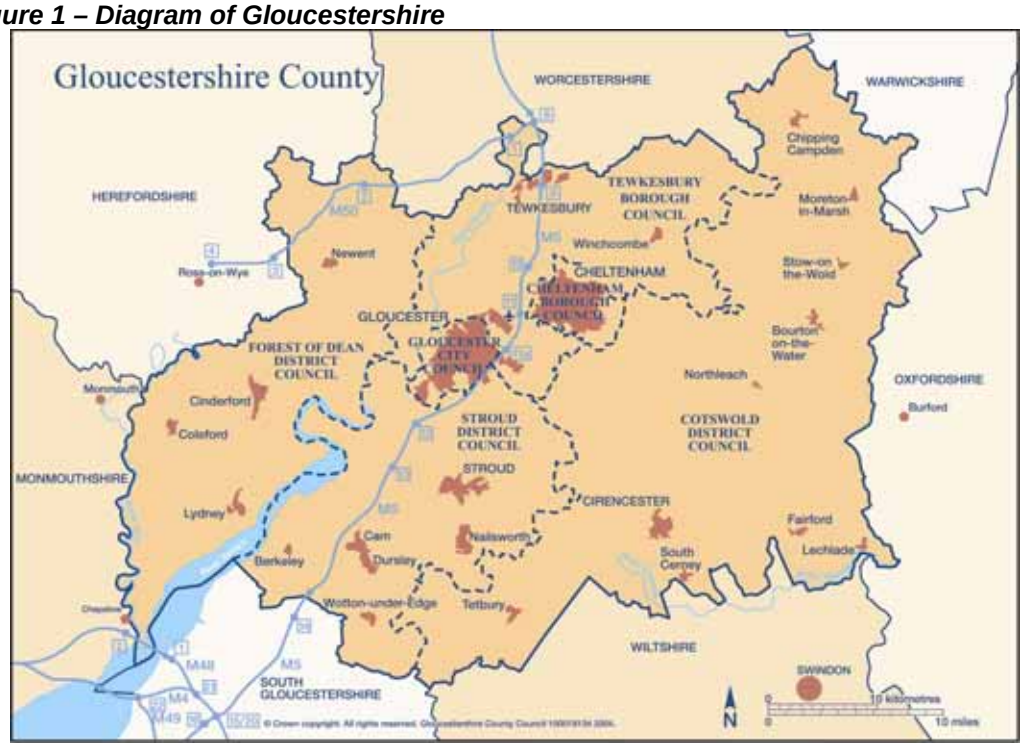
1.20 Core policies will be prepared to support the spatial strategy. These strategic level policies will set out how the strategy is to be implemented and provide the framework for preparing other DPDs in Gloucestershire's Minerals & Waste Development Framework, namely the Development Control DPD and the Site Allocations DPD.

1.21 The tonnages of waste, which require managing, are set out in the RSS/RWMS. The Region is also required to set out the capacity 'gap' that needs to be filled by making additional site provision. The WCS needs to use and incorporate this data in setting the context for making appropriate site provision in Gloucestershire. Actual site identification will be undertaken through a Site Allocations DPD, due to begin preparation on adoption of the WCS.

## Section 2
## Gloucestershire Background Information

2.1 **Location:** Gloucestershire is situated in the north eastern part of the South West region of England and borders the regions of the South East, the West Midlands and Wales. Gloucestershire borders the counties or unitary authorities of Wiltshire, South Gloucestershire, Warwickshire, Monmouthshire, Herefordshire, Swindon and Oxfordshire. Gloucestershire covers an area of 1,020 square miles (2,650 square kilometres), which is approximately 11% of the total area of the South West region. There are six district councils in the County: Cheltenham Borough; Cotswold District; the Forest of Dean District; Gloucester City; Stroud District; and Tewkesbury Borough Figure 1 illustrates this spatial context. More detailed issues and constraints will be shown on a Proposals Map of the County, to be prepared alongside the WCS preferred options document.

***Figure 1 – Diagram of Gloucestershire***




2.2 **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 migration[3] into the County.

2.3 **Housing:** Due to population growth and a change in household composition, more houses are needed in the county. Population projections at district level will be influenced by planning policy, particularly through the emerging Regional Spatial Strategy (RSS), which seeks to locate the majority of development at Gloucester and Cheltenham. The South West Regional Assembly (SWRA) propose to undertake public consultation on the emerging RSS in the Spring / Summer of 2006.

[3] Source: ONS Sub-National Population Projections 2003 & Chelmer Net Migration Led Model produced on behalf of the South West Regional Assembly).

2.5 For the period 2001-2016, Regional Planning Guidance 10 (RPG10 - now adopted in the interim RSS by the SWRA) requires Gloucestershire County Council to make provision for approximately 36,000 new dwellings, or 2,400 per annum. Through the Gloucestershire Structure Plan Third Alteration, the County Council attempted to focus the majority of development at Cheltenham and Gloucester Principal Urban Areas (PUAs), with moderate levels of growth elsewhere.

2.6 As a result of the Planning and Compulsory Purchase Act 2004, the SWRA are in the process of producing the RSS to cover the period 2006-2026. Early indications suggest that the SWRA intend to concentrate a greater level of development at both Cheltenham and Gloucester PUAs than has previously been the case. The draft RSS (version 4.1) suggests that 1,500 dwellings per annum will be accommodated in the immediate Cheltenham and Gloucester area (or the Cheltenham and Gloucester Joint Study Area), with around 12,500 (625 per annum) at Cheltenham PUA and around 17,500 (875 per annum) at Gloucester PUA. The district dwelling provision[4] suggested in Draft RSS (version 4.1) is as follows:

| District | Housing Allocations 2006 - 2026 |
|---|---|
| Cheltenham Borough | 8,500 |
| Cotswold District | 6,000 |
| Forest of Dean District | 5,400 |
| Gloucester City | 11,500 |
| Stroud District | 6,700 |
| Tewkesbury Borough | 10,500 |
| **COUNTY TOTAL** | **48,600** |

2.7 **Transport:** Gloucestershire is well served by the motorway network. The M5 acts as the main north-south route through the County, running roughly parallel to the River Severn. It links with east-west routes a key crossing points on the Severn. The M50 is on the County's northern boundary and the M4 and M48 pass just below the southern boundary.

2.8 The rail network in Gloucestershire contains four trunk lines. The mainline bisects Gloucestershire north to south with tracks from Gloucester running to South Wales and from Stonehouse towards the South East. A line passes through Moreton-in-Marsh in the north east of the County.

2.9 In terms of waterbourne transport potential, Sharpness Docks on the Bristol Channel provides extensive cargo-handling facilities and port-related services accommodating vessels up to 6,000 tonnes. It handles cargoes such as dry bulks, minerals and timbers. Recently the Docks have landed cargoes of cement from northern Spain and fertilizer from Germany and shipped recycled metals to southern-west France. Two working dry docks continue to provide ship repair and refit facilities with access to the sea through the Gloucester and Sharpness Canal. The river and the Gloucester and Sharpness canal provide Gloucestershire with the possibility to develop sustainable waterborne transport.

2.10 Additional wharfage potential may also exist on the opposing the banks of River Severn at Lydney Docks in the Forest of Dean. This site was restored in 2005 through regeneration project funded by the Lottery Heritage Fund and Environment Agency.

2.11 Gloucestershire Airport is centrally located between Gloucester and Cheltenham. It provides facilities for air transport, executive jets, helicopters, charter flights, flying schools, aero engineering and maintenance.

[4] These figures are subject to change in light of comments and resultant amendments made to the RSS.

2.12 Gloucestershire has almost 3,500 miles of footpaths, bridleways and green lanes that make up its public rights of way network (PROW). Three national routes run through Gloucestershire namely; the Thames Path, the Gloucestershire Way and Offa's Dyke Path. The PROW network is managed by the County Council who maintain a definitive map of all paths and rights of way in the County.

2.13 **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.

2.14 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.[5]

2.15 **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 (See Figure 2.) Unemployment in Gloucestershire is low at 1.8% in August 2003, well below the national average at 2.3%. The average county income 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.

2.16 Gloucestershire is predominantly rural with three quarters of the County's countryside being used for agriculture. Cropping is the main activity, though there are large areas used for forestry and sheep/cattle/dairy farming. However, in terms of employment there are four key sectors in Gloucestershire's rural economy: leisure and tourism; manufacturing; finance and business services; and distribution.[6]

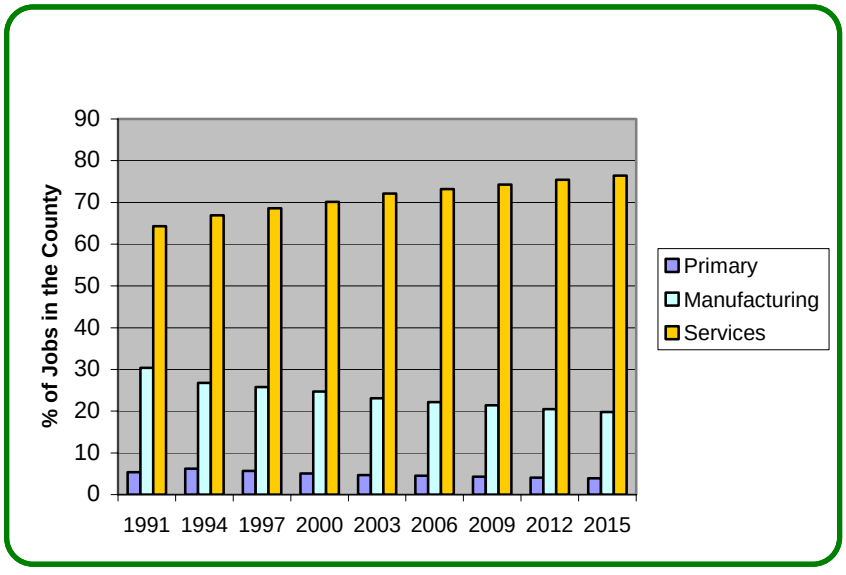



**Figure 2 - The Projected Relative Change in Industry Sector in Gloucestershire 1991-2015[1]**

[5] Source: *The Economy of Gloucestershire 2005* – Gloucestershire Labour Market Information Unit at: http://www.gloucestershire.gov.uk/Environment/glmiu/index.asp

[6] Source: Gloucestershire First, 'The Rural Economic Strategy for Gloucestershire 2003 – 2010' http://staffnet/media/adobe_acrobat/k/9/RURAL_STRATEGY_finalweb.pdf

2.17 **Topography:** Gloucestershire's landscape is characterised by three distinct areas. From west to east these are the Forest of Dean, the Severn Vale and the upland limestone areas of the Cotswolds and Stroud.

2.18 The Forest of Dean is situated on an upland trough of old red sandstone that has been overlaid twice, by carboniferous limestone and then by millstone grit containing iron ores and coal measures. It comprises an upland area containing ancient semi-natural woodland and the three main towns of Cinderford, Coleford and Lydney. It is bounded by the Wye Valley AONB to the west, the Malverns AONB to the north and the River Severn to the south and east.

2.19 Running down the middle of the County is the Severn Vale, containing low lying areas including floodplain. Also in this area are Gloucester and Cheltenham, which are divided by green belt land and the M5 motorway. Also in this central M5 corridor are Tewkesbury to the north and Cam/Dursley to the south.

2.20 The Cotswolds Area of Outstanding Natural Beauty (AONB) is one of the UK's largest AONB designations. The Cotswolds form higher ground interspersed with valleys, particularly around Stroud. To the south east of the County is the Cotswold Water Park, a low lying area comprising the Upper Thames Valley.

2.21 **Rivers and floodplains:** Gloucestershire has 690 km of rivers (11% of the total in the South West), which are monitored by the Environment Agency for river quality. In 1990 68.53% of rivers were of 'good' biological quality, but in 2004 the figure had declined to 66.62%.

2.22 The River Severn is the main watercourse in the county, although the River Thames has its source in the Cotswolds. The River Severn frequently floods in the winter months particularly after heavy and prolonged rain upstream in the Welsh Cambrian Mountains, where the river has its source. The floods of autumn 2000 were the worst since 1947 along much of the Severn and there are consequently major concerns about development in the floodplain. The River Wye is also an important watercourse, comprising a largely natural system of high water quality and conservation interest.

2.23 Much of Gloucestershire is underlain by a major aquifer with high to intermediate vulnerability. Groundwater is particularly susceptible to nitrate pollution caused by agricultural fertilizer. In order to protect groundwater against nitrate pollution certain areas of the County have also been identified as groundwater nitrate vulnerable zones.

2.24 **Biodiversity and the Natural Environment:** Gloucestershire has a wide array of important nature conservation designations, including Special Protection Areas (SPAs), two Ramsar sites (Walmore Common and the Severn Estuary), and six Special Areas of Conservation (SAC). There are also over 100 designated Sites of Special Scientific Interest (SSSI) in Gloucestershire, three of which have been additionally designated National Nature Reserves (NNRs).

2.25 There is also a range of local designations including Key Wildlife Sites, Local Nature Reserves, Private Nature Reserves, Regionally Important Geological Sites, Special Landscape Areas, Ancient Woodland Sites, and Registered Commons. The Gloucestershire Biodiversity Action Plan provides a framework for the conservation of biodiversity based on targeting resources towards protecting priority habitats.

2.26 The Forest of Dean is one of England's largest ancient forests containing over 11,000 hectares of woodland. The area contains extensive areas of old oak woods with abundant flora and fauna in a variety of different habitats. The historic industries of tin mining and coal mining have left local features such as abandoned spoil heaps and dismantled railways that, now regenerated give distinctive character. Old underground mine workings and extensive natural cave systems have contributed to a nationally important population of rare lesser and greater horseshoe bats.

2.27 The Severn Vale is of particular significance for bird life, with several sites in the floodplain of the River Severn seasonally providing ideal conditions for wintering wildfowl. As an estuarine system the Severn Estuary is an internationally important site.

2.28 The Cotswolds are formed from an Oolitic limestone belt, which has resulted in unimproved limestone grassland habitat of great wildlife value. The grassland of commons, valleys and scarp contain ancient turf formed by grazing over many centuries and now supporting an abundance of attractive wild flowers and butterflies. They are also home to one of the prime areas of beech woodland in Britain. The Upper Thames Valley is dominated by sand and gravel extraction, which through sensitive restoration have resulted in lakes and wetland areas of increasing national and international importance for wildlife.

2.29 Although a predominantly rural County, the air quality in Gloucestershire is mainly affected by road transport. The issue of air quality has consequently been considered within the Gloucestershire Local Transport Plan (LTP). The six district authorities in conjunction with Gloucestershire County Council have undertaken individual air quality review and assessments. The results indicate that the contribution of road traffic emissions to local air quality is potentially significant within the County of Gloucestershire.

2.30 **Climactic Factors:** Climate change is recognised as one of the greatest threats facing the world today. The effects of such changes are likely to have significant and far-reaching effects on the manmade and natural environment. Rising sea levels and wetter winters will also increase the likelihood of flooding in low-lying areas. This issue is of particular relevance in Gloucestershire where much of the population lives within the floodplain of the River Severn. Increased soil compaction arising as a result of dried summers will result in increased runoff and greater flood risk.

2.31 **Historic Environment:** The historic legacy of agriculture, industry, architecture and social organisation makes a significant contribution to the distinctive landscapes found in Gloucestershire. There is extensive evidence of the past in the form of prehistoric settlement and burial sites, Roman towns and villas, medieval churches and other features of more local importance. There are around 18,000 archaeological sites recorded in the Gloucestershire Sites and Monuments Record. Approximately 400 of these are Scheduled Ancient Monuments of national importance. Conservation areas and the register of listed buildings held by district councils afford protection to areas of particular architectural or historic interest. The Cotswold District has by far the highest number of conservation areas of any district local authority in Great Britain at 144.

# Section 3
# Sustainable Waste Planning and Policy Background

3.1 We, as a society, produce more waste than ever before. Everybody produces waste and yet nobody wants a facility to manage it near to their home or workplace. Until we as individuals, and as a wider society, stop producing waste the problem of what to do with it will remain.

3.2 Communal ownership and responsibility for waste is fundamental to achieving a solution. The WCS will seek to address this problem. It will set out a **vision** for where we want to be, and a **spatial strategy** to achieve it. The core principle that will underpin it is the need to facilitate sustainable waste management in the county.

## European Directives

3.3 The EC Landfill Directive (Article 5(2)) introduces a requirement to reduce the amount of biodegradable municipal waste (BMW) that is landfilled. Whilst not removing landfill as a waste management option, it cannot be relied on as the principle means of waste management in the UK as it has been in the past. The aim is to move waste management practices away from landfill towards more sustainable methods of waste management and resource recovery by reflecting the waste hierarchy. This places final disposal as the least preferred option.

3.4 The Landfill Directive has been enacted by the Landfill Allowance Trading Scheme (LATS) which sets individual targets that authorities must meet. In order to fall within the LATS regime waste must be "*municipal waste*"[7], which encompasses *all* waste under the control of the local authorities be they waste disposal, waste collection or unitary authorities.

3.5 The Waste and Emissions Trading Act 2003 (WET Act) provides the legal framework for LATS. Guidance on how the LATS scheme operates is set out in 'Municipal Waste, Commercial Waste and the Landfill Allowance Trading Scheme' (Defra, August 2004) and a supplementary document 'Guidance on the Landfill Allowance Schemes: Municipal Waste' (September 2005). The guidance is made under regulation 23 of the Landfill Allowances and Trading Scheme (England) Regulations 2004 (the LATS Regulations) and regulation 16 of the Landfill Allowances Scheme (Wales) Regulations 2004 (the LAS Regulations).

3.6 The LATS targets for the maximum amount of biodegradable MSW that can be landfilled each year by Gloucestershire are set out in Table 3. In determining LATS figures the Government set a nationwide assumption that the biodegradable content of MSW is 68%. Biodegradable municipal waste (BMW), for the purpose of LATS, comprises materials such as green/kitchen waste, paper/card, and 50% of textiles and furniture.

**Table 3 - LATS targets for Gloucestershire (tonnes)**

| *Base Year* | 2006 | 2007 | 2008 | 2009 | **2010*** | 2011 | 2012 | **2013*** | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 | **2020*** |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| *164,323* | 158,634 | 150,100 | 138,721 | 124,497 | **107,428** | 95,471 | 83,513 | **71,555** | 68,486 | 65,416 | 62,347 | 59,277 | 56,208 | 53,139 | **50,069** |

**Notes**
* EU Target years in bold

3.7 Other European Directives that have specific implications for the management of waste in England include:

[7] Defined in section 21 of the WET Act (reflecting article 2(b) of Directive 1999/31/EC) as "(a) waste from households, and (b) other waste that, because of its nature or composition, is similar to waste from households."

- The Hazardous Waste Directive (91/689/EEC) – this relates to the management of particular types of waste listed under the European Waste Catalogue. It was revised in 2005 to place greater emphasis on waste separation and producer responsibility;

- The Packaging and Packaging Waste Directive (94/62/EEC) and Amending Directive (94/62/EC – COM(2001) 729 final) – this relates to the recovery and recycling of packaging wastes. It includes greater emphasis on industry and local authorities working together to meet targets;

- The Hazardous Waste Incineration Directive (94/67/EC) and The Waste Incineration Directive (2000/76/EC) - The first directive sets standards for emission of dioxins and furans and for safe disposal of residues. This was replaced by the Waste Incineration Directive in 2005, which introduces much stricter controls on emissions to air and water;

- The Hazardous Waste Directive (91/689/EEC) and the European Hazardous Waste Directive[8] is transposed by the Hazardous Waste (England and Wales) Regulations 2005 and the List of Waste (England) Regulations. - These provide the framework for the control of hazardous wastes, which include materials that are explosive, highly flammable, toxic or carcinogenic[9]. The European Waste Catalogue 2000 (EWC) sets out twenty different categories of hazardous waste, as defined by chapter headings.

- The Integrated Pollution Prevention and Control Directive (96/6/EC) - This requires industrial processes, including waste management and energy production, to prevent or minimise air, water and soil pollution. It is implemented by the Pollution Prevention and Control (England and Wales) Regulations 2000 (as amended) and the Landfill (England and Wales) Regulations 2002. It is enforced by the Environment Agency;

- The End of Life Vehicles Directive (2000/53/EC) – this promotes the re-use, recycling and recovery of value from "scrap" vehicles. It places requirements on vehicle manufacturers to fund the cost of recycling and disposal;

- The Waste Electrical and Electronic Equipment (WEEE) Directive - This promotes the re-use, recycling and recovery of value from old electrical goods, including: household appliances; computers and telecommunications equipment. The cost of treatment/disposal will fall on manufacturers, but collection facilities will have to be provided for households, which are likely to be the responsibility of local authorities.

- The Water Framework Directive (WFD) came into effect in December 2003. It requires more stringent water quality measures. Planning authorities need to think about the implications of proposed development and land use change on water, including beyond their local authority boundary.

### National Planning Policy Issues

3.8 The Planning and Compensation Act 2004 introduced the requirement to prepare a Minerals & Waste Development Framework (M&WDF). This is comprised of a number of Local Development Documents (LDDs), Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs). Waste DPDs form the framework for determining planning applications for waste management operations. The WCS is an overarching DPD for waste development. More detail on what DPDs are to be prepared can be found in the Gloucestershire Minerals & Waste Development Scheme (M&WDS), which is a project plan setting out what will be prepared and when.

3.9 Guidance on preparing all of these documents is set out in Planning Policy Statement 12 'Local Development Frameworks'. In addition there are a number of other national planning policy statements, guidance notes and companion guides that need to be taken into account. These are introduced where appropriate in this document.

[8] From the 16 July 2005.
[9] Listed in the European Commission Decision (94/904/EC), though this list is under review.

3.10 National planning policy for the management of waste is contained in Planning Policy Statement 10 'Planning for Sustainable Waste Management' (PPS10) and in Waste Strategy 2000: England and Wales (Part 2) (revised July 2005). The whole of WS2000 and its revision are currently being re-written and are being subject to public consultation.

3.11 PPS10 requires regional planning bodies, and in turn WPA's (as sub-regions), to develop a realistic approach to future waste management. It is the role of the RSS to set out an 'apportionment' of waste for each sub-region[10] and to identify the pattern of waste management facilities required across the region to deal with this waste, including the broad locations for facilities.

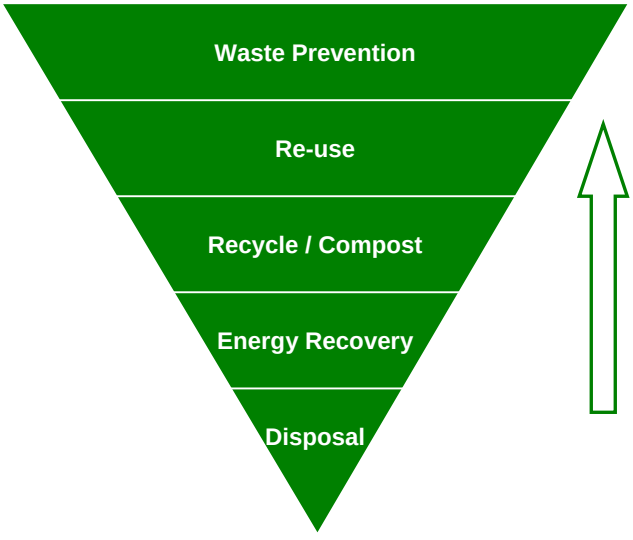
3.12 It is then the role of WPA's to set out in development plan documents (DPD's) policies and sites/areas suitable for new or enhanced waste management facilities for the waste management needs of their areas. In order to undertake this effectively a strategy needs to be prepared, which will be set out in the WCS. Once adopted this will provide the framework for identifying sites or areas in the Site Allocations DPD.

***The National Waste Strategy***

3.13 Waste Strategy 2000, as amended July 2005, is a national statement of the strategy for managing waste. It requires waste management to be moved up the waste hierarchy (see Figure 3). This means reducing the amount of waste we produce as a priority, then making the best use of waste through re-use, recycling/composting, then deriving (recovering) value from the waste through energy recovery, with disposal as the last option. The National Waste Strategy is currently in the process of being revised, with a consultation document being issued by Defra in February 2006.

3.14 The current National Waste Strategy requires individuals, communities and organisations to take responsibility for their waste. This is to be facilitated through effective community engagement that promotes informed debate about the need for waste management facilities and the options available. The Council's adopted Statement of Community Involvement (SCI) will provide the basis for such actions.

***Figure 3 – The Waste Hierarchy***




3.15 An important and integral part of the decision making process is the systematic consideration of alternative options, including both the long and short term environmental impacts for possible options being assessed, taking account of what is feasible and what is an acceptable cost. The SEA/SA will appraise the approach set out in the WCS.

3.16 The consultation draft of the National Waste Strategy (February 2006) proposes to increase national household waste recycling and composting rates to 40% in 2010, 45% in 2015 and 50% in 2020 (this exceeds the current targets of 30% and 33% in 2010 and 2015 respectively). In addition, the imposition of new targets for landfilling C&I wastes are currently subject to consultation. Initial amounts (as a percentage of the total) are 37%, 36% and 35% in 2010, 2015, and 2020 respectively.

[10] Sub-region has been defined as the constituent waste planning authorities.

***Sustainable Development***

3.17 Sustainable development is the core principle upon which planning is based. At its heart is the simple idea of ensuring a better quality of life for everyone, now and in the future. A widely used definition of sustainable development is that of the Brundtland Commission (1987): *"development which meets the needs of the present without compromising the ability of future generations to meet their own needs."*

3.18 A recent Government strategy, *Securing the Future: Delivering UK Sustainable Development Strategy* (March 2005) highlights four priority areas for action:

- Sustainable consumption and production;
- Climate change;
- Natural resource protection;
- Sustainable communities.

3.19 These have been translated into the planning system through PPS1 *'Delivering Sustainable Development',* which identifies four key aims for sustainable development:

- Social progress which recognizes the needs of everybody;
- Effective protection of the environment;
- The prudent use of natural resources; and
- The maintenance of high and stable levels of economic growth and employment.

3.20 Specifically in relation to waste management the Government, in PPS10, requires regional and local waste planning authorities to prepare waste planning strategies that deliver sustainable waste management by:

- Driving waste management up the waste hierarchy (see Figure 3);
- Consider waste as a resource;
- Provide for waste disposal (though to be used only as a last resort);
- Ensure communities to take responsibility for their own waste;
- Enable timely and sufficient provision of facilities;
- Implement European, national, regional and local targets;
- Recover value from waste without harm to the environment or endangering human health;
- Enable waste to be disposed of in one of the nearest appropriate installations;
- Reflect the concerns and interests of communities, the waste collection and disposal authorities, and businesses (including encouraging competitiveness);
- Protect Green Belts whilst recognising particular locational requirements of some types of waste management facilities;
- Ensure design and layout of facilities supports sustainable waste management.

3.21 Planning policy on transportation is set out in PPG13. This sets out key objectives for transport at the national, regional and local levels, which includes the promotion of more sustainable transport choices and an overall reduction in travel. In terms of transporting waste, PPS10 advises waste planning authorities to seek the sustainable movement of waste by rail or water when practicable and beneficial.

3.22 Key to achieving these requirements is the prudent use of resources and providing sufficient opportunities for new waste management facilities of the right type, in the right place and at the right time. These three elements relate respectively to technical, land-use and commercial issues. However, not all can be delivered by the planning system. PPS12 is clear that those policies in DPDs that cannot be delivered through land-use planning do not inform part of Section 38(6) of the Act[11], which provides the starting point in the consideration of planning applications.

[11] Planning and Compulsory Purchase Act 2004 Section 38 (6) states, "If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise."

***Summary of Changes to National Planning Policy***

3.23 The transition from PPG10 to PPS10 has heralded a number of important changes to national waste planning policy. These are briefly outlined below.

3.24 The **Best Practicable Environmental Option** (BPEO) methodology is no longer present. Recently issued national planning policy PPS10[12] does not refer to BPEO. Government policy instead now refers to the delivery of sustainable waste management through a number of core objectives (set out above). In future the principle that underlies the BPEO will be delivered through plan-led strategies that drive waste up the hierarchy (see Diagram 1). A Joint Ministerial Statement maintains that this will be carried out through the formal requirement to undertake a Sustainability Appraisal, incorporating Strategic Environmental Assessment (SA/SEA), of policies and proposals to be included in the WCS and subsequent DPDs.

3.25 The **SA/SEA process** assesses the impacts of documents against a wide range of environmental, social and economic indicators. The intention of this approach is to identify the impacts of waste planning policies and proposals upon the environment, society and the economy at plan preparation stage and to design in necessary changes and mitigation at this point to minimise significant adverse impacts at the planning and development stages. At each stage in the preparation of the WCS it will be tested against a SA/SEA framework for waste planning in Gloucestershire. The SEA/SA report for this Issues and Options paper is currently available for consultation alongside this paper.

3.26 PPS10 specifically excludes the requirement for applicants to demonstrate a quantitative or market '**need**' for their proposal at planning application stage (PPS10, paragraph 22). Instead, PPS10 encourages competitiveness by stating that waste planning authorities should not require applicants for new or enhanced waste management facilities to demonstrate a quantitative or market need if the proposal is consistent with an up-to-date development plan. The JMWMS may identify a particular need for certain types of facility and the 'living draft' companion guide to PPS10 states that sites should be identified to meet this specific need.

3.27 The **proximity principle** has also been revised. This principle is now based on waste being disposed of in the nearest appropriate installation. This implies that waste which is sent to those facilities which manage materials towards the top end of the hierarchy (see Figure 3) could potentially travel further. The issues of utilising sustainable transport methods and the capacity of existing and potential transport infrastructure remain matters that need to be considered.

3.28 National policy on **Green Belts** is contained in PPG2[13]. However, there is now effectively a revision to this national policy, as set out in PPS10, concerning the appropriateness of waste facilities in the Green Belt. Whilst planning strategies should protect Green Belts they need to 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 (PPS10 paragraph 3). This new policy statement places a new test on waste management facilities proposed in such areas to demonstrate why it could be located in the Green Belt.

3.29 Green Belt land adjacent to urban areas potentially restricts waste development in proximity to the main sources of arisings. One of the factors raised in PPS10 is the location of waste management facilities when defining Green Belt boundaries. There are numerous waste management activities in Gloucestershire's Green Belt that make an important contribution to the management of waste in the County. Planning permissions for waste operations go back to the 1960's and this situation has evolved over many years. From this new guidance consideration should be given to the potential to revise this boundary in relation to waste management facilities and future provision. The RSS preparation process is currently considering the issue of Gloucestershire's Green Belt boundaries.

[12] Planning Policy Statement 10 'Planning and Sustainable Waste Management'
[13] Planning Policy Guidance Note 2 'Green Belt'

3.30 The concept of **regional self-sufficiency** does not appear in new national policy. The implications of this for Gloucestershire may not be as significant as for other authorities because of the County's position at the north of the SW region bordering on three other Regional areas. It is impractical for the County to seek to be regionally self-sufficient in the context of its regional position: for example only facilitating waste movements north/south from/to Wiltshire and South Gloucestershire WPAs and yet precluding cross border movements from elsewhere such as Hereford/Worcestershire. This does not mean however that Gloucestershire should not seek to be self-sufficient in terms of managing its own waste.

3.31 For waste planning in the County the WCS provides the high-level strategic policy document. Consequently, it is proposed to include an AONB policy in the WCS rather than leaving this issue until the Development Control DPD. To make the approach consistent with PPS7 (paragraphs 21-23, nationally designated areas), PPS9 (Nature Conservation) and PPG15 (Planning and the Historic Environment) it is also proposed to include in the WCS other strategic policies that relate to matters that are designated at national level. This situation has changed since adoption of the Minerals & Waste Development Scheme as a consequence of the recently issued national guidance.

3.32 The statutory purpose of **Areas of Outstanding Natural Beauty** (AONB) is to conserve and enhance the natural beauty of their area. Guidance issue by Defra (2005) relating to the duties of relevant authorities recommends that where decisions are taken that may affect such areas that they should be able to clearly show how they have considered the purposes of these areas in their decision making. It is considered that the SEA/SA process undertaken as part of WCS preparation incorporates such an assessment. In addition, relevant authorities should ensure that decisions affecting these areas are properly considered and recorded in high level policy documents and public statements.

3.33 AONB Management Plans have been prepared for the relevant areas of the Cotswolds, Wye Valley, and Malverns. These set out guidance and policies for development in those areas. The Wye Valley and Malvern Hills AONB Management Plans were both published in 2004. The Cotswold Conservation Board ratified a Statement of Objectives for Minerals & Waste Planning in the Cotswolds AONB[14]. It's policy (SRP6) relating to waste is *"to support disposal of unavoidable waste locally to minimise traffic within the AONB, where this can be accommodated without damaging the landscape and causing other unacceptable impacts"*.

3.34 The planning context for preparing strategic **nature conservation** policies is set out in PPS9. It provides six Key Principles for ensuring that biodiversity and geological conservation are fully considered in planning decisions. These principles require appropriate weight to be attached to different levels of designations. They also seek to ensure the maintenance, enhancement, restoration and addition to biodiversity and geological conservation interests.

3.35 The **Water Framework Directive** (WFD) requires a strategic policy to be set out in RSS (currently draft policy RE6), which in turn should be translated into a core policy in the WCS. These policies should influence the design and location of new development to ensure they do not create adverse pressures on the water environment that could compromise WFD objectives either within or outside of our respective administrative areas.

### Regional Planning Context

3.36 The South West Regional Planning Body (RPB) prepares a Regional Spatial Strategy (RSS). This overarching planning document forms part of the development plan and must contain specific waste management policies for the region and sub-regions[15]. The RSS is currently being prepared: a 'submission' draft was made available for consultation in April 2006 with final adoption scheduled for 2008. The WCS is required to be in line with the RSS.

3.37 Regionally the principles for sustainable waste management are contained in '*From Rubbish to Resource*' – the Regional Waste Strategy for the South West 2004-2020 (RWMS). This document sets down five key principles that WPAs should adhere to in identifying the

[14] 23rd March 2006

[15] Defined by the RPB as the constituent Waste Planning Authorities, of which Gloucestershire comprises one.

combination of facilities and other waste management options which best meets environmental, social and economic needs for their respective areas. These are:

- The need to reduce reliance on landfill;
- Adoption of the waste hierarchy;
- Regional and sub-regional self-sufficiency;
- The proximity principle; and
- Consideration of the BPEO

3.38 The intention of the SWRA is to incorporate the key aspects of the RWMS in the RSS. However, the advent of PPS10 has superceded some of these principles and the SWRA will need to consider how changes need to be taken into account.

3.39 The strategy for waste management in the RSS should:

- Cover a 15 – 20 year period;
- Set out the tonnages of waste that each sub-region will need to manage, and the pattern of facilities required (draft RSS Policy W1).

3.40 The WPA needs to demonstrate how the WCS and subsequent planning documents are to meet these requirements. The regional targets for Gloucestershire are set out in Table 4. These comprise the 'apportionment' of required annual waste capacity in the Gloucestershire sub-region.

**Table 4 - Regional Waste Management Strategy Targets for Gloucestershire**

| **Municipal Solid Waste (MSW)** | | | |
|---|---|---|---|
| **Target Year** | **Minimum Source Separated** | **Maximum Secondary Treatment** | **Maximum Landfill** |
| 2010 | 130,000 | 80,000 | 160,000 |
| 2013 | 150,000 | 120,000 | 130,000 |
| 2020 | 170,000 (45% minimum) | 200,000 | 60,000 |
| **Commercial and Industrial Waste (C&I)** | | | |
| **Target Year** | **Recycling/ Re-use** | **Recovery** | **Landfilled** |
| 2010 | 260,000 – 280,000 | 150,000 – 180,000 | 285,000 – 315,000 |
| 2013 | 270,000 – 300,000 | 170,000 – 190,000 | 240,000 – 260,000 |
| 2020 | 300,000 – 320,000 (44% minimum) | 260,000 – 290,000 (minimum 39%) | 110,000 – 120,000 (maximum 17%) |
| **Construction and Demolition Waste (C&D)** | | | |
| **Target Year** | **Treatment** | **Transfer** | **Landfill** |
| 2010 | 70,000 | 110,000 | 210,000 |
| 2013 | 70,000 | 110,000 | 210,000 |
| 2020 | 70,000 | 110,000 | 210,000 |

3.41 A key aspect of the new system is the central role that the Region plays in determining the need for additional waste management capacity of regional or sub-regional[16] significance, including any nationally identified need. Not only is it the Region's role to identify, and allocate (apportion), the need for waste management facilities to WPA's, but also to draw up the distribution/pattern of these facilities across the region. Policy W2 of the draft RSS is set out below.

[16] the South West Regional Planning Body has identified waste planning authority areas as being 'sub-regional'.

**Draft RSS Policy W2 Waste Facilities and the Waste Hierarchy**

***Provision of waste facilities will take account of the following waste hierarchy:***
***- waste should be managed on the site where it arises, wherever possible (waste minimisation); and***
***- waste that is not managed at its point of arising should be managed according to the proximity principle.***

***In all areas, identification of sites for facilities will take account of the following:***
***- established and proposed industrial sites, in particular those that have scope for the co-location of complementary activities, such as proposed resource recovery parks; and***
***- other previously developed land, including use of mineral extraction and landfill sites during their period of operation for the location of related waste treatment activities.***

***For SSCTs and other named settlements in Section 4, the location of new waste management or disposal facilities should accord with the following sequential approach:***
***- within;***
***- on the edge of; and/or***
***- in close proximity to (ie within 16 km) of the urban area primarily served by the facility.***

***For rural areas and smaller towns there should be provision of:***
***- a network of local waste management facilities concentrated at, or close to, centres of population identified through Development Policy B; and/or***
***- an accessible network of strategic waste facilities.***

***Major sources of waste arising in rural areas will be treated locally, unless specialised facilities are required.***

3.42 In relation to hazardous wastes there is a draft RSS policy (submitted version, April 2006), which is set out in Figure 4 below. This will need to be taken into account in preparing an appropriate policy in the WCS. Determining 'environmental acceptability' is a key aspect that the WCS will need to address.

***Figure 4*** **- Draft RSS Policy on Hazardous Waste (Policy W3)**

***Waste Planning Authorities should recognise the need for the development of capacity for the disposal of Stable Non-Reactive Hazardous Wastes at existing or proposed new landfill facilities (identified in Policy W1*) and safeguard capacity for the disposal of other hazardous wastes at existing sites permitted and authorised as hazardous waste landfill sites provided they are environmentally acceptable. Provision should also be made in Waste LDFs for hazardous waste transfer, treatment and disposal facilities.***

* Submitted RSS Policy W1 directs readers to RSS Appendix 2, which sets out MSW and C&I requirements but not hazardous waste.

3.43 Additionally, the supporting text to the RSS policy (paragraph 7.4.4) states that "*proposals should also take account of significant and sustained transfers of waste across regional boundaries, where the originating and receiving Regional Planning Body has agreed the most sustainable waste management method. 'Significant' cross-regional boundary transfers of waste are those where … more than 10,000 tonnes of hazardous waste, is transferred between regions."* There is however a lack of detailed guidance on how such an approach is to be implemented in practice.

## Local Planning Policy

3.44 Under the arrangements for transferring from the 'old style' local plans to the 'new system' of local development frameworks there will be a rolling programme of reviewing policies from the Structure Plan and WLP. The Minerals and Waste Development Scheme (M&WDS) sets out those policies in the Structure Plan and WLP that are proposed to be replaced by the WCS. However, the adoption of PPS10 potentially requires the revision of other policies in the WLP.

### *Gloucestershire Structure Plan*

3.45 The Gloucestershire Structure Plan Second Review (1999) currently comprises part of the development plan for Gloucestershire. Changes were made as part of the unadopted 'Third Alteration' and although these together with the Second Review policies comprise a material consideration the waste related polices (see Table 6) have been superseded by PPS10 and therefore their materiality is lessened. The waste policies of the Structure Plan will be replaced by the RSS and the WCS when they are adopted.

3.46 The list of Structure Plan policies that this WCS replaces is set out in Table 5. These policies are reproduced in full in Appendix D.

| Table 5 - Gloucestershire Structure Plan Waste Policies | |
|---|---|
| **Second Review Policies (1999)** | |
| WM.1 | BPEO & Development Operation |
| WM.2 | Location of Primary Waste Management Facilities |
| WM.3 | Regional Self-Sufficiency |
| WM.4 | Recycling and Composting |
| WM.5 | Energy from Waste |
| WM.6 | Disposal |
| **Unadopted Third Alteration Policies (2005)** | |
| SD.22 | BPEO & Development Operation |
| SD.23 | Waste Management Facilities |
| SD.24 | Need for Waste Management Facilities |

### *Waste Local Plan (2002-2012)*

3.47 The strategy of the WLP is to raise waste awareness to help reduce the amount of waste produced in the first place, and promote greater waste re-use and recovery. Whilst many of the WLP's key objectives remain valid, there are some which have been superceded by national guidance, for example the Best Practicable Environmental Option (BPEO) methodology, regional self-sufficiency and the proximity principle.

3.48 Sustainable waste management, as derived through the Best Practical Environmental Option (BPEO) methodology (or process), formed a key element of the current adopted WLP. This Plan was prepared under PPG10 guidance[17] and the National Waste Strategy 2000. The BPEO process for assessing the appropriateness of waste development proposals included issues such as the proximity to arisings, regional self-sufficiency, the waste hierarchy, the technology being proposed and whether there was a 'need' for that development.

3.49 A key issue to address in the WCS is how to take forward the strategic aspects of the adopted WLP where reference is currently made to requiring applicants to demonstrate sustainable waste management through the analysis of the BPEO for a particular waste stream. For policies that are proposed to be rolled forward relatively unchanged one of the options could be to replace "BPEO" with 'sustainable waste management', and then to define in the WCS what this means and what the policy requirements are.

3.50 The WLP was site specific, not process specific. Its' spatial strategy comprised a network of facilities located around the County's main population centres, the intention being to reduce the

[17] Planning Policy Guidance Note 10 'Planning and Waste Management'

social, economic and environmental costs of transporting waste, providing better access to waste recovery facilities and help natural resources to be conserved. Particular sites and areas were identified where management facilities could potentially be developed without unduly stifling innovation in waste technology.

3.51 The WLP 'preferred sites' and 'areas of search' for waste management facilities are split between strategic (over 50,000 tonnes per annum [tpa] capacity/throughput) and local (less than 50,000 tpa). Most sites are identified as having the potential for a wide range of uses and waste streams. These sites remain 'saved' under transitional arrangements until replaced by a site specific DPD. It should be noted that the WCS itself is not a site specific document, therefore it is only the framework for selecting sites when the Site Allocations DPD is prepared, that are currently being considered.

3.52 Where there are policies in the WLP that relate to international or nationally designated areas/sites these are proposed to be reviewed in the WCS because of their strategic nature. Guidance issued since the M&WDS was adopted has raised issues that potentially affect some such areas, for example AONB's and Green Belts. To provide a consistent approach it is proposed to review these and similar level policies within the WCS rather than wait until preparation of the Development Control DPD. This in turn will assist in developing a framework for the preparation of the Waste Site Allocations DPD.

3.53 The aim of the new style plans is to be shorter more user friendly documents. As a result it may be that policies are combined where appropriate. The WLP policies that are proposed to be replaced by the WCS are listed in Table 6 and set out in full in Appendix E.

**Table 6 –**
**Adopted Waste Local Plan Policies to be Replaced by or Amended in the WCS**

| Policy No | Policy Subject |
|---|---|
| 1 | Best Practical Environmental Option |
| 2 | Regional Self-Sufficiency |
| 3 | Proximity Principle |
| 7 | Safeguarding Sites for Waste Management Facilities |
| 16 | Special Waste Facilities |
| 23 | Internationally and Nationally Designated Sites for Nature Conservation |
| 26 | Areas of Outstanding Natural Beauty |
| 28 | Sites of National Archaeological Importance |
| 35 | Green Belt |
| 36 | Waste Minimisation |

3.54 Policy 16 relates to Special Waste Facilities. In the MM&WDS this policy was intended to be reviewed through the Development Control DPD. However, the emerging RSS policy, and changing circumstances in the county, mean that it is more prudent to revise this policy through preparation of the WCS.

3.55 For completeness, two other WLP policies that refer to BPEO: policy 18 'Non-Energy Recovery Incineration'; and policy 21 'Agricultural Improvements', require revision. However, both are potentially more suited to the Development Control DPD (to be prepared following WCS adoption). As a result an interim statement could be set out in the WCS explaining how policies such as these that refer to BPEO will be interpreted in the interim.

3.56 The adopted WLP contains other policies, relating to locally designated environmental assets and operational matters. These are proposed to be revised in a Development Control DPD alongside the Site Allocations DPD, which will be prepared following adoption of the strategic level WCS.

***Links with Gloucestershire's Community Strategy***

3.57 Local authorities have a duty to prepare *Community Strategies*. These have the objective of enhancing the quality of life for local communities whilst contributing to the achievement of sustainable development. Gloucestershire County Council's community strategy was adopted in 2004. It was drawn up following considerable community involvement and has sustainable development as its' basis. All of the actions in the strategy aim to deliver economic, social and environmental wellbeing in a sustainable way.

3.58 The 'Community Strategy for Gloucestershire' states that to ensure a better environment we will minimise the amount of waste produced and increase recycling (P4, page 21). The six District's community strategies also embrace the notion of minimising waste (see Figure 5 below):

***Figure 5* – Gloucestershire Districts' Community Strategy Aims**

| | |
|---|---|
| **Cheltenham** | To explicitly seek to reduce waste and increase recycling |
| **Cotswolds** | To minimise waste production and finite natural resource usage |
| **Gloucester** | To ensure that new developments are sustainable |
| **Forest of Dean** | Aim to develop a sustainable environment |
| **Stroud** | Aim to develop a sustainable environment |
| **Tewkesbury** | To seek additional recycling schemes |

3.59 Through PPS1 the Government is keen to ensure that there is integration between Community Strategies and planning documents: planning is a tool for local authorities to use in establishing and taking forward the vision for their areas as set out in their community strategies. Consequently, one option for the WCS is to adopt the same vision, objectives and sustainable development policies. The Gloucestershire Community Strategy 2004-2014 has a vision of *"making a positive difference for people who live in, work in and visit Gloucestershire"*. In addition, for sustainable waste management the Vision should link to Gloucestershire Community Strategy's fourth theme 'a better environment' and in particular the aim of minimising the amount of waste and increasing recycling[18].

***Joint Municipal Waste Management Strategy (JMWMS)***

3.60 The JMWMS sets out 'how' municipal waste should be managed, and is prepared by the County Council's Waste Management Unit, through the Gloucestershire Waste Partnership[19] (GWP). The development plan, through the WCS and Site Allocations DPD, makes provision for 'where' waste should be managed.

3.61 The JMWMS and WCS are being prepared side by side and therefore an iterative process is being followed whereby the WCS both informs and is informed by the JMWMS. The JMWMS should draw from the adopted WLP (until replaced by waste DPDs) to preclude options being developed in isolation that are potentially contrary to the spatial strategy for the County. To do so could result in the JMWMS ultimately being undeliverable.

3.62 The JMWMS is currently being prepared based on nine aims and objectives, which have been agreed through the GWP. These however are subject to change following the GWP's consultation with key stakeholders:

1. minimising the amount of waste that is generated;
2. improving source segregation of waste materials;
3. increase composting, and undertake close to the source of arising;
4. treat waste that arises as a resource that can be re-used/recycled/recovered;

[18] Gloucestershire Community Strategy page 21

[19] The GWP includes representatives from the six district councils (waste collection authorities) and county council (waste disposal authority). The aim is that this should harmonize activities between authorities across the county.

5. support for local reprocessing markets for recyclable materials;
6. facilitate segregation of hazardous materials from the waste stream;
7. changing people's behaviour towards waste generation and management;
8. foster partnership working between the six district councils, the county council, local business, community groups and other organisations;
9. prudent use of financial resources to improve the collection, handling and disposal infrastructure.

3.63 The preparation timetable for the JMWMS includes a draft for stakeholder consultation in Autumn 2006, with the final document being adopted in 2007. This will then be incorporated into the Preferred Option draft of the WCS (which is timetabled for consultation shortly after).

3.64 There is integration between the JMWMS and the WCS through joint consultation initiatives. Although the timetable set out in the adopted M&WDS does not entirely align with the expeditious preparation that the JMWMS needs to follow, joint consultation (including a stakeholder forum event) has been undertaken during the formative stages of both documents and will continue to dovetail wherever possible. Consultation on both planning and waste contract issues have been included within awareness raising initiatives, for example M&W newsletters have included updates on the JMWMS and likewise the WDA have incorporated land-use related elements into their evidence gathering questionnaires. Additionally the same database of interested stakeholders has also been used through which the joint stakeholder forum was generated.

3.65 In April 2005 the Gloucestershire Waste Partnership[20] issued a joint strategy statement to DEFRA and the EA in response to the requirements of the WET Act 2003. This statement forms the basis for a revised JMWMS that is currently being prepared. When adopted this document will replace the current strategy. A new contract is in the process of being issued for the waste treatment and disposal of Gloucestershire's municipal waste. This contract is likely to be signed prior to adoption of the JMWMS.

3.66 The principle aim of the strategy is to provide residents with a sustainable waste management service where waste generation is minimised and waste materials are seen as a resource. The intention is to develop innovative solutions that will add value and deliver social and economic benefits to our community. When this is adopted the types of facilities that are needed to deal with MSW need to be fed into the WCS. The interaction between the two documents forms an iterative process whereby each informs the other.

3.67 The JMWMS aims/objectives recognise that continued further growth in Gloucestershire's municipal waste arisings is not sustainable. It consequently makes a commitment to reducing the growth in Gloucestershire's municipal waste arisings by 2020 and to maximise all recycling and composting. GCC in consultation with the Districts and other community groups are developing a business case for waste minimisation activities and how much these will impact waste growth. This will set out practical ways to reduce or re-use waste and allow the County to set realistic waste growth reduction targets.

3.68 Once materials are diverted from landfill through source segregation or sorting it is necessary for there to be a market use for them, otherwise they will ultimately end up being disposed of. There is consequently a need to develop markets for materials that are recovered, for example for the compost produced or the plastic/glass bottles collected etc.

3.69 In summary, the principle aim of the JMWMS is to provide residents with a sustainable waste management service where waste generation is minimised and waste materials are seen as a resource. This reflects the aims and objectives of the adopted WLP and those proposed for the WCS. The intention is to develop innovative solutions that will add value and deliver social and economic benefits to our community.

[20] the Gloucestershire Waste Partnership comprises the six District Councils and the County Council.

***Local Transport Plan***

3.70 The Local Transport Plan (LTP) sets out the transport strategies Gloucester County Council will seek to implement from 2001/2002 to 2005-2006, and addresses how we can improve road safety, reduce pollution, reduce congested roads and improve our environment for all who live, work and enjoy leisure time in Gloucestershire. The County's first LTP was finalised in 2000.

3.71 The Second Gloucestershire LTP (2006 – 2011) was adopted by the County Council on 22nd February 2006 for submission to Central Government on 31st March 2006. The LTP's first objective is minimising the environmental impact of freight distribution, (i.e. reducing air and noise pollution and the harmful impacts of transport on both the natural and built environment), the strategy contains policies which aim to facilitate the movement of freight by alternative modes through greater use of existing rail, sea and inland waterways and the development of additional inter-modal transfer facilities.

3.72 One of the key issues that came out of the WPA and WDA joint stakeholder forum was transport: both the proximity of facilities to arisings and the need for sustainable forms of transport to be used. In support of this the LTP proposes to improve links to the port facilities at Sharpness and help promote the potential of Sharpness; open a rail freight facility at Sharpness; help to make use of the existing rail freight facilities at MOD Ashchurch; and improve inter-modal facilities to allow greater use of water transport for freight, in particular on the Gloucester and Sharpness canal and River Severn. The WCS, and subsequent DPDs, will need to reflect this strategy where appropriate for different waste streams.

3.73 The LTP also includes a Lorry Management Strategy, which aims to improve efficiency while minimising the environmental impact of freight distribution. This will be achieved in three ways: Development of a lorry route strategy; implementation of weight, height, length or access restrictions where appropriate; and active partnership and engagement with the haulage industry.

***District Local Plans and Local Development Frameworks (LDF)***

3.74 The six District Councils in Gloucestershire will each prepare a LDF for their area. These will contain policies and identify sites for industrial/employment uses. Many waste management uses previously fell within the B2 use class. Consequently the types of location that national planning policy identifies as potentially being suitable for waste management uses will inevitably coincide with those that district planning authorities will be looking at for siting industrial and employment uses. However, being an employment use, it is considered that waste development would not necessarily compromise allocations in other plans.

3.75 District Councils, through their development control (DC) functions will provide a key mechanism through which policies on waste minimisation and site safeguarding will be implemented. The former is subject to a supplementary planning document that is currently under preparation. The latter should be assisted by the requirement for District Councils to incorporate adopted sites for waste management facilities on their LDF proposals map. This will generate greater awareness, for both DC officers and developers, of the locations of waste facilities across the County. Emerging LDF proposals maps will need to incorporate the alterations contained in the adopted WLP until replaced by a Site Allocations DPD.

**Monitoring and Implementation**

3.76 The Annual Monitoring Report (AMR) sets out four core output indicators for monitoring waste issues. These are:

- Production of primary land won aggregates;
- Production of secondary / recycled aggregates;
- Capacity of new waste management facilities by type;
- Amount of municipal waste arising, and managed by management type, and the percentage each management type represents of waste managed.

3.77 The AMR also contains monitoring objectives. For the County's first AMR these were based upon the 'saved' polices of the adopted minerals and waste local plans. Each monitoring objective has a number of local output indicators linked to it. Please refer to the AMR (available on the County Council website) where these are set out in detail.

3.78 As policies in the adopted WLP are replaced through the WCS and subsequent DPDs the relevant monitoring objectives and output indicators may also need amendment. This will be done through the AMR that is produced following adoption of the DPD (although Preferred Option and Submission versions of DPD's will need to be taken into account in the AMR).

## Section 4
## Gloucestershire's Waste Operations – Past Present and Future

4.1 Approximately 1.37 million tonnes[21] of waste is handled in Gloucestershire each year. The responsibility for dealing with that waste falls on a number of different organisations. MSW/household waste is collected by district councils (Waste Collection Authorities, WCA) and disposed of/managed by the County Council (Waste Disposal Authority, WDA). The Districts and the County use contractors to undertake these services. C&I, C&D and hazardous waste are collected, managed and disposed of by private companies and do not fall within the responsibility of the WCAs or WDA.

4.2 Finding suitable places to manage these wastes is the responsibility of Gloucestershire County Council as the waste planning authority (WPA). This is done through allocating sites in a development plan (rather than providing the actual facilities themselves). It is then a matter for the waste industry to come forward with planning applications to develop these sites for waste related uses. To make provision at an appropriate level it is necessary to know how much of each type of waste is produced, where, and what the current handling capacity is to deal with it.

***Waste Data Interpretation and Assumptions***

4.3 Government guidance advises that waste data needs to be robust and yet avoid spurious precision. At the advice of the EA data is presented in 'thousands of tonnes' to make the tables more readable. Figures are therefore rounded up/down and as a consequence not all columns in data tables will add up precisely to 100%. This approach also reduces concerns about over-precision and spurious detail.

4.4 The managed data presented in this section is derived from two sources: the waste disposal authority (WDA) provide MSW information; the rest is supplied by the Environment Agency (EA), who are charged with providing this information through PPS10. The base year for MSW is 2004/05, being the most recent completed year. For other waste streams the most up to date data provided by the EA is for 2002/03. At each stage of WCS preparation the most up to date data available will be used.

4.5 The WDA collect information as part of the household waste management contract. Data is provided by the contracted operator and the WCAs. Consequently information on MSW is good. Data for MSW has over the last 10 years been more accurate than for other waste streams and consequently a degree of confidence can be had in both the derived trend information and also what/where it arises.

4.6 Complete data sets for MSW are available for 2004/05. These are the figures used when examining MSW in isolation of the other waste streams. However, when viewing the entire waste generation/management situation in the County the MSW data needs to be from the same year as the C&I and C&D figures. This is because of the aggregated way that information is provided to the EA on biodegradable waste (MSW and C&I). At the time of writing the most up to date data available was for 2002/03.

4.7 Data on C&I and C&D wastes is provided by the EA. It is compiled from waste management licensing returns sent by operators of waste management facilities (as replaced by Integrated Pollution Prevention and Control (IPPC) permits). Information provided includes waste category types, input/output details and process mode and location. The return form however allows an 'unknown' option to be entered for these latter categories. As a result, EA advice is that where 'unknown' is given in the return as a final destination this should be assumed to be Gloucestershire, and where the mode is 'unknown' this should be taken as being disposed of to landfill. The EA also have to trust that the returns are accurate.

[21] This figure is based on the most recently available data from the Environment Agency.

4.8 Information on facility capacity is derived from a WPA assessment of planning permissions and waste management licence data. Where the planning permission has not placed a limit on the tonnages of material that can be handled (usually those sites with older planning permissions), EA license returns were used to give an indicative capacity. In addition a survey of waste operators was undertaken to provide an industry perspective on the current situation.

4.9 The data that is presented in this Issues and Options paper has been prepared by the WPA following liaison with both WDA and EA. It is considered by these three parties to represent the most up to date and accurate picture of waste management in Gloucestershire that is currently available. The fact that there are more assumptions being made is testament to an increase in information and knowledge about the data being provided. The more that is known about a waste stream the more issues that come to light. Being able to make these assumptions has improved the data, as previously such assumptions were not known and therefore account was not taken for potential inaccuracies. Consequently the data presented is considered to provide a robust basis for land-use planning purposes in the County.

4.10 The map below shows indicative locations of waste management facilities in Gloucestershire.

### Municipal Solid Waste (MSW)

4.11 There are estimated[22] to be 565,000 people to be residing in Gloucestershire. In 2004/05 residents produced 301,000 tonnes of household waste[23], which together with around 8,500 tonnes of 'trade' waste (collected by local authorities from shops and businesses) these comprise MSW. Figure 6 below illustrates how this waste was managed. Table 7 sets out in more detail the tonnages involved.

**Figure 6 - Gloucestershire MSW Management 2004/05**

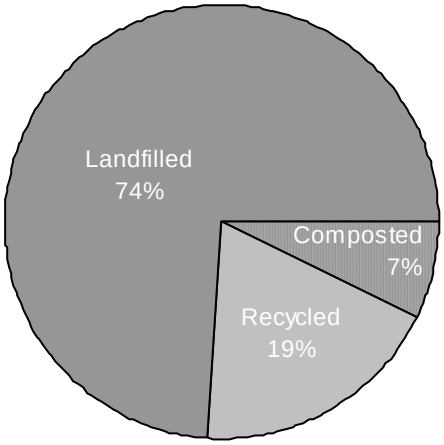



**Table 7 - MSW Arising in Gloucestershire April 2004 – March 2005 (in 000's tonnes)** [Data provided by the Waste Disposal Authority]

| Transferred* | Source Segregated** | | Treated/ Recovered | Sent to Landfill | TOTAL |
|---|---|---|---|---|---|
| | Composted | Recycled | | | |
| 55 | 23 | 58 | 0 | 228 | **309** |
| n/a | 7% | 19% | 0% | 74% | |

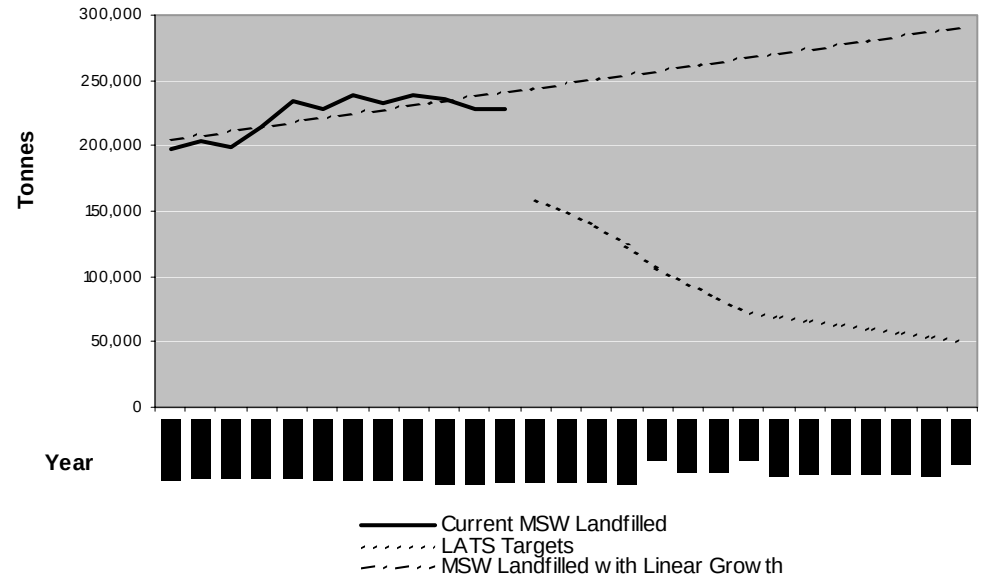
**Notes**
* Not counted in overall total as transferred material is included in other totals.
** The County recycling figure for the purposes of meeting BVPI was 24.3%. The figure shown here includes recycled DIY/hardcore.

4.12 Waste Strategy 2000 and Best Value Indicators set targets for recycling and composting. The Best Value recycling targets for Gloucestershire, recognised in the adopted WLP, are to recycle/compost 24% of household waste by 2003/04 rising to 36% by 2005/06. This has now been revised by the Government to a standard rate of 30%. There is a Gloucestershire County Council internally set Best Value Indicator target of 36% for composting and recycling by 2007/08 (of which 17% is for composting). The consultation draft of the National Waste Strategy (February 2006) proposes to increase national household waste recycling and composting rates to 40% in 2010, 45% in 2015 and 50% in 2020.

4.13 In addition, the County Council is required to achieve LATS targets (see paragraph 3.4) for biodegradable MSW diversion from landfill (see Figure 7). The penalty for LATS failure (if the County is unable to trade permits) is currently £150 per tonne over and above disposal costs. The LATS landfill requirements provide a more stringent target than the RWMS indicative landfill capacities. Under LATS, in the key years of 2010, 2013 and 2020, the maximum biodegradable inputs into landfill are 107,428 tonnes, 71,555 tonnes and 50,069 tonnes respectively. Consequently these are the figures that this WCS is aiming to meet.

[22] Figure taken from 2004 mid year estimates published by National Statistics (September 2005)
[23] Approximately 2% of MSW is from street sweepings.

**Figure 7 - Gloucestershire MSW Landfill**




***MSW Growth***

4.14 The County has a household recycling/composting rate of 26%[24] (see Table 7). Initial indications from the WDA are that the Best Value target for 2005/06 of 30% will be met. Over recent years the total tonnage of MSW has annually increased by around 3%. This growth is caused by a number of factors. These range from legislative drivers to council collection regimes to social changes, including population growth, levels of affluence, consumer behaviour, climate change etc.[25]

4.15 The tonnages of MSW that are required to be managed are set out in Table 8 below. The growth rate is taken from emerging JMWMS work undertaken by Eunomia consultants, who consider that an average rise of 1.6% between 05/06 to 2025/26 is realistic. It is based on the anticipated rise in population, but also factoring in waste minimisation and waste awareness campaigns. If growth rates are different the resultant tonnages that require diversion will alter similarly.

4.16 Column D of Table 8 provides the minimum tonnages of biodegradable MSW that Gloucestershire is required to divert using either composting, recycling or recovery methods. The council must meet the 2010, 2013 and 2020 targets by diverting a minimum of 126,528, 174,464 and 218,250 tonnes respectively, assuming growth rates are as indicated.

[24] The County recycling figure for the purposes of meeting BVPI was 24.3%. The 26% figure shown here includes recycled DIY/hardcore.

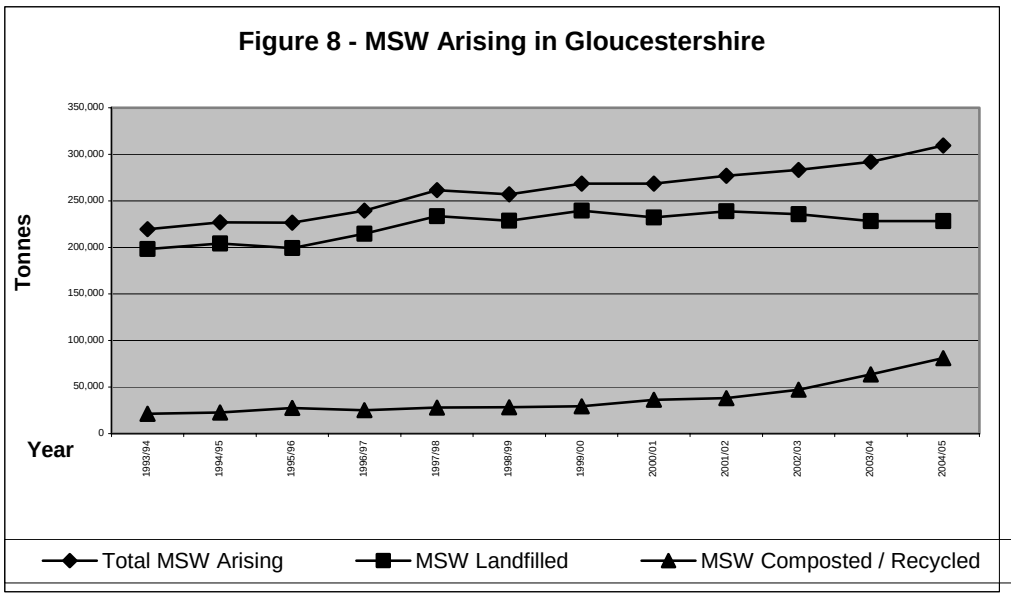
[25] Source: National Assessment of Civic Amenity Sites (NACAS) 2004.

| Table 8 - Estimated Tonnage of MSW Requiring Diversion Each Year (tonnes) | | | | | |
|---|---|---|---|---|---|
| **Year** | **Growth Rate** | **Tonnage of MSW arising** | **Biodegradable Tonnage of MSW (68%)** | **Amount of Biodegradable MSW allowed to landfill (LATS)** | **Diversion* of biodegradable MSW required to avoid fines or trading** |
| *2005* | | *309,403* | | | |
| 2006 | 2.26% | 316,395 | 215,149 | 158,634 | 56,515 |
| 2007 | 2.26% | 323,546 | 220,011 | 150,100 | 69,911 |
| 2008 | 2.26% | 330,858 | 224,983 | 138,721 | 86,262 |
| 2009 | 2.26% | 338,335 | 230,068 | 124,497 | 105,571 |
| **2010** | 1.69% | 344,053 | 233,956 | **107,428** | 126,528 |
| 2011 | 1.69% | 349,868 | 237,910 | 95,471 | 142,439 |
| 2012 | 1.69% | 355,781 | 241,931 | 83,513 | 158,418 |
| **2013** | 1.69% | 361,793 | 246,019 | **71,555** | 174,464 |
| 2014 | 1.69% | 367,908 | 250,177 | 68,486 | 181,691 |
| 2015 | 1.41% | 373,095 | 253,705 | 65,416 | 188,289 |
| 2016 | 1.41% | 378,356 | 257,282 | 62,347 | 194,935 |
| 2017 | 1.41% | 383,690 | 260,910 | 59,277 | 201,633 |
| 2018 | 1.41% | 389,101 | 264,588 | 56,208 | 208,380 |
| 2019 | 1.41% | 394,587 | 268,319 | 53,139 | 215,180 |
| **2020** | 0% | 394,587 | 268,319 | **50,069** | 218,250 |
| **Notes**<br>*Diversion from landfill includes composting/recycling and ties in with revised Waste Strategy targets. | | | | | |

***Biodegradable MSW Diversion from Landfill***

4.17 The increase in recycling/composting illustrated below (Figure 8) is encouraging. This trend needs to continue if Gloucestershire are to meet LATS requirements and Best Value/Waste Strategy targets. Whilst the 2005/06 target of 30% for recycled/ composted material has been achieved, meeting future LATS targets will require additional biodegradable MSW diversion from landfill.

**Figure 8 - MSW Arising in Gloucestershire**




4.18 Recycling and composting figures should be further increased following adoption and implementation of a Supplementary Planning Document (SPD) on 'Waste Minimisation in Development Projects'. The SPD, which is currently being prepared and can be viewed on the County Council website, will require provision to be made in new developments to enable source segregation of waste materials for recycling/composting. In conjunction with

expanded collection schemes this will help to capture further recyclables and organic waste (in accordance with RWMS policy P7.1).

4.19 Increasing BMW diversion from landfill means that more source segregated collection of biodegradable waste (which includes garden waste, kitchen waste, paper, 50% of textiles and cardboard) is required in addition to capacity to compost or anaerobically digest this material. Additional source segregated collection of 'dry' recyclable materials, in particular paper, is required at the kerbside, at HRCs and bring banks. This is to be achieved by collecting further materials, increasing frequency of collections plus marketing and promotion. The capacity of facilities required to implement this diversion is outlined below.

**Current/Required MSW Facility Capacities**

4.20 The current capacity of facilities to manage MSW in Gloucestershire are set out in Table 9. The RSS 'apportionment' is also provided so that the capacity 'gap' can be illustrated. Each facility type is then considered individually.

**Table 9 - Gloucestershire MSW Facility Capacities ('000 tonnes per annum)**
*[the information presented here is explained in the paragraphs following the table]*

| | Composted (in-vessel and windrow) | Recycling | | Treat-ment Facilities | Disposal (Landfill) |
|---|---|---|---|---|---|
| | | **HRC** (Household Recycling Centre see Table 10) | **WTS** (Waste Transfer Station see Table 11) | | |
| **Current Throughput** | 23 | 65 | 74 | 0 | 228 |
| **Approx. Current Capacity** | 50 | 52***** | 39****** | 0 | 10,500*** |
| **Regional (RSS) Requirement by 2020** | 170* minimum | | | 200 maximum | 60 maximum |
| **Gloucestershire Requirement** | 90** | To be considered during preparation of the JMWMS | | | 50 LATS BMW target for 2020**** |
| **Capacity Gap per annum** | 80 | | | 200 | - |

**Notes**

* RWMS target includes composting, HRCs, kerbside collections and bring banks. The figure for recycling above does not include these latter two elements.

** WDA anticipated requirement for 90,000t capacity for composting. Although the current capacity is 50,000t this for green waste only, and some permissions are temporary. This incorporates a Best Value target of composting 17% (53,000t) of MSW by 2007. Additional in-vessel capacity for mixed organic wastes will be required (see paragraphs 4.20-4.26 below).

***Voidspace figure is for MSW, C&I and C&D wastes and assumes a conversion of 1t/m³.

**** The 50,069t is for biodegradable MSW only - it does not include the 32% inert fraction.

***** This is a 'recycling' capacity, it does not include the residual waste transferred to landfill. For HRCs this is 36%, therefore the 52,000 figure represents recycling capacity only.

******The WTS 'recycling' capacity figure does not include material sent to landfill, whereas the throughput figure does, hence the apparent discrepancy.

*Composting Capacity (in-vessel and windrow)*

4.21 By diverting green waste and kitchen waste to composting or biological treatment this will reduce the amount of biodegradable material that has to be landfilled and assist in meet LATS and Best Value requirements. Green waste composting can be undertaken in open 'windrows'. Mixed organic or kitchen waste requires enclosed treatment systems which meet standards set by Animal By-Products Regulations (ABPR) 2005.

4.22 Kerbside collected green waste is currently taken to windrow facilities at Cory Environmental sites (Wingmoor Farm and Hempsted) or to a facility at Dymock in the Forest of Dean. A recent planning permission to compost green waste for a time limited period at Sunhill in the Cotswolds provides additional interim capacity. The total County capacity with planning permission for composting is currently 50,000tpa (see Table 9).

4.23 The composted amount (see Tables 7 and 9) does not include waste that is home-composted. The County and District Councils have been selling home-composting bins to the public at discounted rates to encourage the diversion of this waste from 'wheelie bins' and 'black bags'. Home composted material does not enter the waste stream for the purposes of calculating tonnages, although it is included as part of waste minimisation activity. Therefore in reality Gloucestershire are performing better than the figures suggest.

4.24 All of the current capacity for composting is windrow, there is no in-vessel capacity. Meeting the internally set BVPI target of 17% composting by 2007/08 will entail a windrow capacity requirement of around 56,000tpa[26]. However, if the Hempsted windrow facility (24,000tpa) were to cease due to reconfiguration of the site there would be a subsequent shortfall in green waste composting capacity up to 2007 of around 30,000 tpa. A further issue is the temporary nature of the composting permission at Sunhill.

4.25 With regards future requirements in Table 9, emerging advice from the WDA is that at an 85% capture rate of all kitchen and garden waste in the household bin, we will require 90,000 tonnes capacity: split approximately 80,000:10,000 between co-mingled[27] and green waste. As there are currently no in-vessel facilities and thus no capacity in the County, if the JMWMS identifies a strategy to collect and manage co-mingled organic waste then in-vessel facilities will be required for this to be delivered.

4.26 Making good the capacity 'gap' will involve provision of both in-vessel and windrow methods. Although there is currently capacity for around 50,000tpa of windrow composting the temporary nature of much of these operations (in terms of planning restrictions) and the ability to only accept green waste means that a 'capacity gap' of around 80,000tpa is consequently more realistic.

4.27 This composting capacity shortfall should not be seen as a target ceiling. Proposals for moving waste management up the 'hierarchy' are preferable to disposal. The WDA are preparing a 'biowaste hierarchy' for managing compostable waste. It places home composting at the top (most preferred solution), followed by communal and kerbside collection schemes with biowaste treatment using a residual waste technology at the bottom. Consequently, to meet this hierarchy, there should be an aim where practicable for all green waste to be composted at home, and as much mixed organic waste to be composted in-vessel as possible.

*Recycling (at Household Recycling Centres [HRC])*

4.28 HRC's are used to accept, bulk-up and temporarily store segregated materials for recycling (in most cases to transfer on to a reprocessing facility outside of the county, although green waste maybe composted and some bulky items landfilled).

4.29 County operated HRC's in Gloucestershire have a potential handling capacity[28] of around 71,000 tpa and handled 55,000 tonnes in 2004/05 (see Table 10 – note this does not include Swindon Road depot). Of this 22,000 tonnes was sent on for recycling, 13,000 tonnes for composting, and the remainder (36%) being disposed of by landfill. In addition, Cheltenham Borough Council run a waste facility at Swindon Road. This site is used as a district depot for bulking-up materials and civic amenity site. It therefore has combined HRC and WTS functions. The figures for material that goes through that site is subsumed within the overall recycling figure for Cheltenham.

4.30 The throughput at HRC's includes a significant amount of residual waste that requires landfilling. The total capacity of 81,000 tpa (including Swindon Road Depot) is therefore not available exclusively for 'recycling capacity', hence the discrepancy in Table 9 between throughput and recycling capacity. It may also be constrained by site operating limitations. Consequently it is not practical to simply use total HRC capacity as an indicator of meeting

[26] Approximate figure, depends on growth rate used.
[27] Co-mingled refers to green (garden) waste and kitchen/catering (cooked food) waste.
[28] Based on planning permission conditions – though site constrains may restrict actual capacity.

RSS targets. A current recycling capacity based on 64% of HRC capacity (i.e. less the 36% that is landfilled) represents a more realistic figure.

| Table 10 - Capacity of Household Recycling Centres (HRC) ('000 tonnes) | | |
|---|---|---|
| **Site Name/Location** | **Capacity Tonnage** | **2004/05 Throughput** |
| Fosse Cross, Cotswolds | 12* | 6 |
| Oak Quarry, Coleford | 13* | 8 |
| Hempsted, Gloucester | 15 | 14 |
| Pyke Quarry, Stroud | 20** | 17 |
| Wingmoor Farm, Bishop's Cleeve | 11* | 10 |
| *Swindon Road, Cheltenham**** | *10* | *10* |
| **Total** | **81*****| **65** |
| **Notes**<br>* approximation derived from EA license returns.<br>** Pyke Quarry has a theoretical throughput of 43,500, which includes the now completed landfill operation. The 20,000 capacity is an assumed figure for the HRC element based on WDA advice about current operations.<br>*** site run by Cheltenham Borough Council.<br>**** The Capacity figure of 81 will include a proportion of residual waste transferred to landfill. For HRCs this is 36%, therefore in Table 9 the 52,000 figure represents recycling capacity only. | | |

4.31 It is noticeable that those HRCs in close proximity to urban areas are operating almost up to capacity. As additional elements of household waste are separated, for example fridges, televisions, furniture etc, there may be a need to re-work site layouts or to seek additional space to provide for more capacity.

4.32 There may also be a 'spatial' or locational shortage of HRC provision, for example areas of the County where members of the public are not within easy access 'drive time' of a facility. In particular the northern area of the Cotswolds appears to be lacking HRC provision. Additionally, in respect of new housing allocations coming forward (see Section 2), there may be a need for additional HRC's and 'bring' banks around the county. The JMWMS should provide more detail on the required provision for HRC's to be incorporated into the WCS.

*Waste Transfer Stations*

4.33 Waste transfer stations (WTS) are used to transfer residual waste and to bulk-up kerbside collected dry recyclables. There are elements of crossover between the two types of operations, however for the purpose of clarity in this document WTS's are separated in Table 11 according to their dominant activity.

| Table 11 - Capacity of Waste Transfer/Bulking-up Facilities ('000 tonnes) | | |
|---|---|---|
| **Site Name/Location** | **Capacity Tonnage** | **Throughput (04/05)** |
| **General WTS (for residual waste)** | | |
| Elliot Road, Love Lane, Cirencester | 50 | 27 |
| Lydney Industrial Estate | 36 | 24 |
| *(Subtotal)* | *(86)* | *(51)*** |
| **Recyclables WTS** | | |
| Eastern Avenue Depot, Gloucester | 13* | 5 |
| Phoenix House, Elmstone, Hardwicke | 18 | 10 |
| Eastington, Stroud | 8* | 8 |
| *(Sub-total)* | *(39)**** | *(23)* |
| **Total** | **125** | **74** |
| **Notes**<br>* Approximation derived from EA license returns and operator survey.<br>** All of the 51,000 is sent on to landfill.<br>*** This is the capacity figure used in Table 9. | | |

4.34 The capacity of WTS's in the County is around 125,000tpa. However, the majority of the throughput at general WTS's is sent on for disposal. Conversely, the majority of the tonnage at the recyclables WTS's is bulked-up and sent on for reprocessing (for example glass at Phoenix House). Consequently only the latter figure is incorporated into Table 9.

4.35 Although there appears to be spare capacity at these sites, if extra materials such as card are collected in the future there may be a requirement for additional facilities to bulk-up and transfer to facilities where it will be processed (recycled) into other products. Again, as with HRCs, there may be areas of the County that require additional provision. The JMWMS will advise on such requirements.

*Treatment*

4.36 'Treatment' is defined in the RWMS as being operations such as mechanical biological treatment (MBT) or thermal processing. By 2010 all waste must be pre-treated before it can be landfilled, this can include sorting though the EA will advise on the exact details as to what constitutes pre-treatment. However, currently there are no biodegradable waste 'treatment'[29] facilities in the County and consequently new facilities will be required during the plan period.

4.37 The type and capacity of these facilities is a matter that is currently being considered by the GWP through preparation of the JMWMS. The generic technologies that are being investigated are:

- Mechanical biological treatment (MBT) with gasification of the refuse derived fuel;
- Energy from waste (EfW);
- Autoclaving with gasification of the refuse derived fuel.

The issue of final disposal to landfill is also being assessed in respect of current operations. The WDA will be carrying out a detailed residual waste technologies review during the summer 2006, which will feed into the JMWMS.

***Overall MSW Requirements***

4.38 In summary, for MSW, recycling/composting rates are increasing year on year in the County. The 2005/06 target of 30% for recycled/composted material has been achieved. However, meeting LATS targets will require additional biodegradable waste diversion from landfill. The County must therefore continuously increase composting and recycling rates at the kerbside, at HRC's and bring banks. This means that more source segregated collection of dry recyclables and compostable waste is required. Additionally there is a need for treatment capacity for residual waste prior to final disposal. Landfill capacity (voidspace) for disposing of non-hazardous waste (MSW, C&I and C&D) in the County are considered together later in Section 4.

[29] 'Treatment' being defined in the RWMS as being operations such as mechanical biological treatment (MBT) or thermal processing.

## Commercial and Industrial (C&I) Waste

4.39 During 2002/03 there was around 599,000 tonnes of C&I waste managed in Gloucestershire. This can be broken down into two main categories: 240,000 tonnes[30] of metal wastes and 359,000 tonnes of general biodegradable C&I waste. Table 12 sets out how these wastes were managed.

**Table 12 - C&I Managed in Gloucestershire April 2002 – March 2003 (in '000s tonnes)** [Data provided by the Environment Agency]

| | ***RWMS Category*** **Recycling / Re-Use** | | ***RWMS Category*** **Recovery** | | **Sent to Landfill** | **Overall Total*****|
|---|---|---|---|---|---|---|
| | **Composted** | **Recycled** | **Treated/ Recovered** | **Transferred*** | | |
| **C&I** | 3 | 22 | 8 (1**) | 70 (15***) | 319 | **359** |
| **Metal Waste** | n/a | 118 | 4 | 179**** | 44 | **240** |

**Notes**

* transferred waste included to comply with RWMS (Annex C) target requirements which combines transferred and treated C&I waste (see Table 4).

** After being treated around 7,000t is subsequently landfilled and included in that figure. Therefore only 1,000 is included in the Overall Total.

*** Of the 70,000t, 15,000 went out of County so is not included in other totals (55,000t was landfilled). Therefore only the 15,000t of transferred C&I is counted in the Overall Total.

**** Does not include metal waste transfer with EA license exemption. Only 73,000t of metal material is counted in the Total as this went out of County so is not included in other totals.

***** The Overall Total is made up of 3+22+1+15+319 =560 (but due to previous rounding the figure is closer to 359)

4.40 Metal waste is a largely self-contained waste stream. It has been separated from general biodegradable C&I to allow a clearer picture to be presented in respect of what recycling/recovery/treatment facilities are needed in the county for other C&I wastes. The figures in Tables 12 & 13 show that almost half of metal wastes were recycled compared with 7% of biodegradable C&I waste.

4.41 Metal waste recycling is driven by market forces as there is readily available economic value in recycling scrap metal. Of the 240,000 tonnes of metal waste managed, most of this was at metal recycling facilities, otherwise referred to as scrap yards and car breakers. There is currently capacity in the County to handle around half a million tones per annum of metal waste[31]. The vast majority of the recycled amount was sent to 'unknown' destinations for recycling.

4.42 EA license data only captures wastes which either entered the waste stream or was managed in Gloucestershire. In respect of biodegradable C&I waste, where these were re-used on-site, or collected by a company not based within the County, these will not be captured within the available data. Notwithstanding this, the data would appear to indicate that there is a need for more composting, recycling and recovery of biodegradable C&I waste within the County.

4.43 The amount of biodegradable C&I waste managed (i.e. not including metals) has reduced slightly over the last five years. Recycling of C&I waste, as a proportion of the total, has remained relatively stable, although in tonnage terms it has diminished. Encouragingly there has been a big reduction in the amount of C&I that is being landfilled. This could be for a number of reasons, though this trend is likely to be attributed to the introduction of the landfill tax.

[30] Of the total metal waste handled, 73,000t was transferred out of the County.

[31] This is mainly comprised of transfer facilities at Sharpness Docks. This facility is registered exempt by the EA and consequently licensing information is not available. A figure has therefore not been included in the managed total. The WPA has sought to rectify this data discrepancy by carrying out its own survey, however to date the information has not been forthcoming. The figure presented in table 14 sets out this site's capacity rather than a handled figure.

| Table 13 - Historical Management of C&I Wastes in Gloucestershire (not including metals) (000's tonnes) | | | | | |
|---|---|---|---|---|---|
| | **1998/99** | **1999/00** | **2000/01** | **2001/02** | **2002/03** |
| C&I to Landfill | 382 | 407 | 330 | 333 | 319 |
| C&I Diverted* | 32 | 50 | 41 | 11 | 40* |
| **Total C&I Waste Managed** | **414** | **457** | **371** | **344** | **359** |
| | | | | | |
| **% recycled** | 8% | 11% | 11% | 3% | 11% |
| **% landfilled** | 92% | 89% | 89% | 97% | 89% |
| **Notes** *C&I diverted includes recovered waste and that transferred out of the County. The 40,000t is therefore comprised of 15+3+22 from Table 12. | | | | | |

4.44 Identifying a trend in C&I waste is difficult as the overall managed total has been up and down over this period. Consequently it is difficult to make a definitive future projection for growth rates. The RWMS has assumed a 0% growth rate, as has the adopted WLP. Given the data in Table 13 it is considered appropriate to roll forward this approach in the WCS.

***C&I Facility Capacity***

4.45 As with facilities that handle MSW, an assessment of planning permissions and waste management licence data has been undertaken by the WPA for sites managing C&I waste. EA license returns were used to provide an indicative capacity where no limit was set by planning condition on the tonnages of material that could be handled (see Table 14). The current capacity for landfill disposal of non-hazardous biodegradable waste combines C&I, C&D and MSW and it is therefore not possible to distinguish between the three.

| Table 14 - Gloucestershire C&I Facility Capacity (000's tonnes) | | | | |
|---|---|---|---|---|
| | **Composting** | **Recycling/ and Re-use** | **Transfer and Recovery[32]** | **Disposal (Landfill)** |
| **Throughput (02/03)** | 3 | 22 | 78* | 319 |
| **Metal handling** | - | 118 | 183 | 44 |
| **Capacity at March 2006** (not including metals) | 4 | 68 | 120** | 10,500*** |
| **RWMS 2020 Target** (includes metals) | 300-320 | | 260-290 | 110-120 |
| **Capacity Gap per annum** | 228 | | 140** | - |
| **Notes** * The 78,000t comes from Table 12 (adding 70+8). Of this figure 63k,000t was sent on for recycling or landfilling (i.e. 55+7 but it rounds up to 63), which is therefore double counted and not included in the overall total. ** Metal transfer capacity is around 200,000tpa. *** the total voidspace figure is for MSW, C&I and C&D wastes and assumes a conversion of 1t/m³. | | | | |

4.46 The figures presented in Table 14 are as accurate as possible given data collection and presentation issue: there is a practical difficulty in distinguishing between recycling/re-use and transfer/recovery facilities in respect of how different operators describe their activities, how the EA record different operations through licenses, and how the activities were described in the planning application/permission. In reality there is likely to be an element of crossover between categories. Additionally some C&I will go through facilities classed as for MSW. Notwithstanding these difficulties with definition there is a considerable capacity

[32] The RWMS target composition for recovery includes transferred and treated wastes.

shortfall (or 'gap') in facilities for diverting C&I waste from landfill in terms of meeting RSS targets (i.e. for re-using, recycling, transferring and recovering non-metal waste materials).

4.47 Government guidance indicates that similar wastes, from different streams, could be managed through the same facilities (most obviously MSW and C&I). However, unlike municipal waste, which is dealt with by local authorities, C&I waste is handled by private contractors. Whilst it is not the role of the WPA to provide the facilities themselves for managing this waste stream (that is a matter for the waste industry), it is necessary for the WPA to 'make provision' in terms of identifying sites or setting out a policy approach, for where such facilities could go. This should encourage the private sector to invest in these types of facility that manage waste higher up the waste hierarchy. In addition the JMWMS could take the lead in seeking to provide facilities capable of handling combined MSW and C&I wastes.

4.48 Table 14 indicates that there is a capacity 'gap' for recovery/transfer to divert the biodegradable element of the C&I waste from landfill. Consequently, a significant proportion of this waste stream is being disposed and therefore facilities that divert biodegradable C&I waste are required. Capacity for disposing of non-hazardous waste (MSW, C&I and C&D) in the County is considered together towards the end of Section 4.

### Construction and Demolition (C&D) Waste

4.49 For the purposes of land-use planning the vast majority of C&D waste is assumed to comprise inert materials (brick, concrete, sub-soils etc.). This counter-balances C&I waste, which although it will contain small amounts of inert material, is considered to be largely biodegradable (active) waste.

**Table 15 - Gloucestershire C&D Waste Trends (000's tonnes)**

| | 1999/00 | 2000/01 | 2001/02 | 2002/03 |
|---|---|---|---|---|
| **C&D Landfilled** | 166 | 188 | 289 | 312 |
| **C&D Recycled/Treated** | 34 | 29 | 57 | 95 |
| **C&D Transferred*** | 62* | 62* | 104* (6) | 181* (11) |
| **Total Inert C&D Managed** | **262** | **279** | **353** | **418** |
| | | | | |
| **% recycled/transferred** | 37% | 32% | | |
| **% recycled** | | | 16% | 23% |
| **% landfilled** | 63% | 67% | 82% | 75% |

**Notes**

* A significant amount of transferred material is double counted with other processing/landfill. In 2002/03 only around 6% (11kt) of transferred figure was not included in other totals (primarily because it was sent out of County). To make the year 01/02 consistent with 02/03 6% (6kt) has been added. In previous years a different calculation method was applied to transferred/treated/recycled material due to less detailed data from the EA (see adopted WLP Appendix 8). Direct comparisons year on year are therefore not comparing like with like.

4.50 During 2002/03 there was around 418,000 tonnes of C&D waste managed in the County: 312,000 tonnes was landfilled and 95,000 tonnes was recycled. This latter figure does not include material re-used on-site, for example used for landscaping or crushed for bulk-fill, as this never officially enters the waste stream (for the purpose of EA data collection). Transferred C&D waste, of which there was 181,000 tonnes, is already largely counted within the landfill and recycling sub-totals and is therefore not counted again. However, around 11,000 tonnes of C&D waste was transferred out of the County and therefore this has been included in the overall total (see notes to Table 15).

4.51 In Gloucestershire the amount of C&D waste has been increasing since 1999. Data for the South West indicates that regionally C&D waste arisings have fluctuated. For the purposes

of planning the RWMS and the adopted WLP both assume C&D waste growth to be zero. However, the figures in Table 15 indicate that for Gloucestershire this is not necessarily the case. The last couple of years data show a marked increase in the tonnages that were managed.

4.52 This change may partly be attributed to the way that the WPA was presented with data from the EA prior to 2001/02. Previously, data was provided in an aggregated form making it difficult to determine levels of double handling (where waste is transferred from one facility to another but returns are provided to the EA by both operatives). Data for 2002/03 is more detailed allowing more certainty of waste handling. On balance, until more recent data is forthcoming it is proposed to plan on the basis of a continuation of 2002/03 tonnages.

***C&D Facility Capacity***

4.53 The County is currently well served by facilities for managing C&D wastes (see Table 16). As a result the amount of C&D waste that is being diverted from landfill has almost trebled since 1999. This is likely to be a market/industry response to economic drivers such as the landfill and aggregates taxes. Consequently, as with metal waste recycling/re-use, C&D recycling/recovery/re-use has been largely market driven.

**Table 16 - Gloucestershire C&D Facility Capacities (000's tonnes)**

| | Recycled/ Treated | Transfer | Landfilled |
|---|---|---|---|
| **2002/03 throughput** | 95 | 181 | 312 |
| **Approx. 2006 Capacity** | 249 | 332 | 10,500* |
| **RWMS Minimum Requirement by 2020** | 70 | 110 | 210 |
| **Capacity Gap per annum** | - | - | - |

**Notes**
* Voidspace figure is for MSW, C&I and C&D wastes and assumes a conversion of 1t/m³.

4.54 The regional capacity targets for C&D waste are set out in Table 16. There is presently significant C&D waste capacity for treatment (crushing and screening) and transfer. This indicates that there is no capacity 'gap' in Gloucestershire for C&D waste. However, to comply with the waste hierarchy and to reduce the reliance on primary mineral resources, more needs to be done to divert C&D waste from landfill. Additional sites for recycling C&D would still potentially be sought as this will stimulate industry competition and further assist in diverting this resource away from landfill.

4.55 The preparation of a waste minimisation supplementary planning document (SPD) comprises a proactive strategy intended to stimulate this diversion. This document applies to both C&D waste during construction and then for MSW and C&I waste during the building's occupation. If the SPD is successful in diverting C&D from landfill then additional competition may occur in the marketplace stimulating demand for more recycling facilities.

4.56 Capacity for disposing of non-hazardous waste (MSW, C&I and C&D) in the County is considered in the next part of Section 4.

## Current Non-Hazardous Landfill Voidspace

4.57 This section relates exclusively to non-hazardous waste. There are currently four principal landfill sites in Gloucestershire with a voidspace capacity of 10.5 million m³ for disposing of non-hazardous waste (MSW, C&I and C&D). These are: Hempsted in Gloucester; two sites at Wingmoor Farm, Bishops Cleeve; and another at Frampton to the south of the County.

The sites at Hempsted and Frampton are likely to be completed within the a plan period of 10 years and one of the Wingmoor Farm sites has a time-limited planning permission to 2009.

4.58 In addition, there are small amounts of capacity for inert materials sited at various locations around the County, including 660,000m³ capacity at Huntsmans Quarry, Naunton. These are predominantly linked to agricultural improvements and mineral site restoration, many benefiting from EA license exemption. As these sites cannot accept general biodegradable wastes they have not been included in this section and not added into the 10.5 million m³ figure.

4.59 The WLP states that in 2000/01 Gloucestershire's voidspace for biodegradable waste was 11.7 million m³ (not including material for cover). At current levels of input this provided capacity up to 2021. Since adoption of the WLP the Landfill Directive co-disposal regulations took effect, which has meant that some of the previous voidspace is no longer available for non-hazardous disposal. This, combined with additional years tipping since 2000/01 and increased arisings, has effectively reduced the County's non-hazardous biodegradable voidspace to 10.5 million m³ (information provided by the Environment Agency). The voidspace figures presented in table 17 are indicative and seek to avoid spurious over precision.

**Table 17 - Gloucestershire's Non-Hazardous Voidspace ('000m³)**

| | EA Estimated Remaining Voidspace* | Approx. Biodegradable Annual Inputs** | Approx. Inert Annual Inputs** | Estimated remaining life from 2005 at current input levels (years) |
|---|---|---|---|---|
| **County Total** | 10,500 | 599 | 208** | 13 |

**Notes**

* based on most up to date information provided by operators in EA license returns during 2004/05.
** inputs are in m³ not tonnes - using 2002/03 data and a compaction density of 1.0 t/m³ for biodegradable waste and 1.5t/m³ for inert waste (biodegradable includes landfilled metals). For information the tonnage of inert material landfilled is around 312,000 tpa.

4.60 The EA have provided this estimate for voidspace based on operator's returns. However, predicting how long this voidspace will last requires a number of assumptions to be made. These include: waste growth rates for each stream; meeting various targets; contractual issues; time limited planning permissions; availability of material etc.

4.61 Theoretically, based on current inputs, disposal capacity in the County for non-hazardous biodegradable wastes should last until around 2018/19. This scenario, presented in Table 17, is based on a number of key assumptions:

- that current landfilling practices and tonnage inputs continue as at 2002/03;
- that as one landfill site closes all of the annual inputs transfer to another site in the County;
- that sites can operationally handle the increased tonnages (see paragraph below);
- that compaction reflects densities of 1.0 t/m³ for biodegradable waste and 1.5t/m³ for inert waste;
- that all of the 10.5 million m³ voidspace will be available for disposal.

4.62 The handling capacities vary from site to site. Hempsted is unlimited whilst the voidspace at Wingmore Farm West is 400,000tpa, and Wingmore Farm East is 250,000tpa. However, as sites are not currently landfilling to their permitted capacity there is some scope for waste currently being taken in at Hempsted and Frampton to be handled at other sites.

4.63 If any of these assumptions were to change, which could be for a variety of reasons, then voidspace life would similarly change – either be shortened or extended. For C&I and C&D wastes a situation may occur whereby contractual issues mean that waste (which may

have been imported in the county) no longer gets disposed of in Gloucestershire. This would reduce inputs and husband the remaining capacity. It therefore does not necessarily follow that because 807,000m³ of waste was landfilled in the County in 2002/03 that this will continue into the future.

4.64 If sites close before completing their permitted capacity then the overall voidspace will run out considerably sooner than 2018/19. Conversely, if inputs reduce (which could be for a number of reasons, eg. contractual issues, waste minimisation initiatives, targets being met, increased segregation of wastes for recycling and composting, landfill tax incentives, landfills in other WPA areas attracting waste) then the voidspace could last for longer.

4.65 In addition, the impact of agricultural wastes becoming 'controlled wastes' is not known. It may be that a proportion of these previously on-farm managed waste materials are sent to non-hazardous landfill. This would further affect voidspace. As a result of all these variables it is difficult to accurately predict the lifespan of landfill voidspace.

4.66 Depending upon the timeframe used for the WCS, and if the basic scenario in Table 17 occurs, then there is the potential that additional voidspace capacity will need to be found for residual wastes i.e. those that cannot be re-used/recycled/composted, or for residues following treatment. This additional voidspace, if required, would be during the latter stages of the WCS period, most likely post 2018/19.

4.67 The lead-in time for gaining planning permission for such development however would require consideration of this matter considerably earlier. To ensure that the County does not run out of landfill it will be necessary to carefully monitor the situation (in particular input tonnages and stated voidspace) with a view to beginning detailed site appraisal work around 2010/11 when the fate of existing voidspace is known.

### Hazardous Waste

4.68 The category of waste labelled 'hazardous' is derived from the three main waste streams. It contains small amounts of waste from each, for example: fridges and televisions from MSW; asbestos and contaminated soils from C&D waste; and processing residues such as sludges and oils from C&I wastes. Such wastes not only include substances that are usually recognised as being dangerous or harmful, but can also include wastes from everyday activities, such as engine oils, paints and batteries. Hazardous wastes are categorised in 20 broad types by the European Waste Catalogue [EWC], see Table 19.

4.69 The Environment Agency has provided import/export information, breaking down what amounts of hazardous waste were imported in the County and what tonnages were exported (see Table 18).

**Table 18 - Hazardous Waste Import/Export for Gloucestershire (000's tonnes)**

| | A | B | C | D |
|---|---|---|---|---|
| **Year** | **Amount arising in Glos** | **Amount Exported from Glos** | **Amount Imported into Glos** | **Total* Amount Disposed in Glos (A-B+C =D)** |
| **2000** | 53 | 36 | 69 | 86 |
| **2001** | 37 | 23 | 49 | 63 |
| **2002** | 25 | 22 | 39 | 42 |
| **2003** | 28 | 27 | 44 | 46 |

**Notes**
*Please note that figures have been rounded for ease of presentation.

4.70 The amount of hazardous waste generated in the County during 2003 has reduced considerably since 2000. The amount that has been imported into the County has also decreased. The result is that the overall tonnage being managed in the County has fallen dramatically by around 47% over this four-year period. It is possible that the advent of the 'co-disposal' regulations in 2004 may have further changed this picture, though at the time of drafting there was no more up-to-date data available from the EA.

**Table 19 - Hazardous Waste in Gloucestershire 2003 (tonnes)**
(Figures in brackets are for 2002)

| EWC** ref. | Type of Waste (please note that these are broad descriptions and categories contain a degree of overlap) | Amount arising in Glos | Amount Exported from Glos | Amount Imported into Glos | Total Amount Managed in Glos |
|---|---|---|---|---|---|
| 02 | Agricultural and Food Production | 11.8 (1.8) | 11.8 (1.8) | 0 (0) | 0 (0) |
| 03 | Wood and Paper Production | 76.6 (21.4) | 76.6 (21.4) | 0 (0) | 0 (0) |
| 04 | Leather and Textile Production | 1.8 (1.0) | 1.8 (1.0) | 10.1 (18.9) | 10.1 (18.9) |
| 05 | Petrol, Gas and Coal Refining/Treatment | 0.4 (7.0) | 0.4 (7.0) | 28.4 (54.5) | 28.4 (54.5) |
| 06 | Inorganic Chemical Processes | 863.6 (596.3) | 860.8 (590.9) | 230.0 (448.3) | 232.8 (453.7) |
| 07 | Organic Chemical Processes | 595.7 (560.8) | 586.2 (538.8) | 960.2 (813.6) | 969.7 (835.6) |
| 08 | MFSU Paints, Varnish, Adhesive and Inks | 594.5 (764.5) | 507.9 (616.1) | 49.2 (120.2) | 135.9 (268.6) |
| 09 | Photographic Industry | 137.9 (187.1) | 137.9 (187.1) | 8.0 (14.9) | 8.0 (14.9) |
| 10 | Thermal Process Waste (inorganic) | 22.7 (1.8) | 22.7 (1.8) | 11,191.1 (9,160.2) | 11,191.1 (9,160.2) |
| 11 | Metal Treatment and Coating Processes | 1,577.5 (2,330.1) | 1569.8 (2,239.9) | 40.8 (28.1) | 48.6 (118.3) |
| 12 | Shaping/Treatment of Metals and Plastics | 1,903.9 (1,517.7) | 1889.7 (1,495.9) | 360.7 (566.9) | 374.9 (588.7) |
| 13 | Oil and Oil/Water Mixtures | 13,444.5 (8,729.7) | 13,386.1 (8,662.5) | 4,994.9 (3,868.8) | 5,053.3 (3,936.0) |
| 14 | Solvents | 154.9 (298.5) | 154.9 (298.5) | 0 (73.3) | 0 (73.3) |
| 15 | Packaging, Cloths, Filter Materials | 101.9 (219.0) | 72.8 (176.1) | 204.2 (835.1) | 233.3 (878.0) |
| 16 | Not Otherwise Specified on the List | 1,054.4 (1,104.3) | 967.9 (1,042.4) | 267.9 (660.3) | 354.3 (722.2) |
| 17 | C&D Waste and Asbestos | 6,834.6 (7,525.8) | 5,812.3 (5,035.6) | 984.1 (1,687.9) | 2,006.4 (4,178.1) |
| 18 | Healthcare | 102.9 (46.2) | 102.9 (46.0) | 8.8 (36.2) | 8.8 (36.4) |
| 19 | Waste/Water Treatment and Water Industry* | 273.2 (429.9) | 122.1 (257.6) | 24,183 (18,875.6) | 24,334.1 (19,047.9) |
| 20 | Municipal and Similar Commercial Wastes | 49.1 (74.3) | 48.5 (73.4) | 3.2 (168.7) | 3.8 (169.6) |
| 99 | Unclassified | 660.0 (621.0) | 660.0 (621.0) | 887.5 (1,686.7) | 887.5 (1,686.7) |
| **Annual Totals** | **2003** (2002) | **28,461.8** (25,038.2) | **26,993.0** (21,914.8) | **44,412.1** (39,118.1) | **45,880.9** (42,241.5) |

**Notes**
* this category also includes APC residues.
** EWC – European Waste Catalogue reference relates to 'chapter numbers'.

4.71 A detailed analysis was undertaken of the most recent EA data from 2002 and 2003 (see table 19). In 2003, of the 28,500 tonnes of hazardous waste produced in Gloucestershire, only 1,500 tonnes was managed in the County. This means that 27,000 tonnes was **exported** out of the County. Further analysis of detailed movements indicate that 9,000 tonnes was sent to other places in the South West. The remainder left the South West Region, with 11,000 tonnes going to the West Midlands.

4.72 Gloucestershire also **imports** as well as exports hazardous wastes. During 2003 44,400 tonnes of hazardous wastes were brought in from around the country, of which 2,000 tonnes originated in the South West. Almost three quarters of the imports came from the South East Region and London, and around 5,000 originated in the West Midlands.

4.73 The exportation of hazardous waste from Gloucestershire is made up of mainly oils/waste-water and C&D wastes (soils and asbestos). However, oils/waste-water is the third largest import into the County, behind thermal process and waste treatment process residues (otherwise known as APC [air pollution control] residues). This shows that some materials (such as oils) are effectively being exchanged between geographic areas. The main quantities of hazardous waste materials imported into the County in 2003 were thermal process waste (under EWC category 10) and residues from waste management facilities (under EWC category 19).

***The Role of Regulatory Authorities***

4.74 The role of local authorities (as waste collection/disposal authorities) includes making arrangements for the collection and disposal of household waste, which can include hazardous waste; the provision of collection facilities for some hazardous wastes, such as oil and paint. The role of the WPA is to prepare the planning framework for determining planning applications for hazardous waste management development.

4.75 Once permitted the continued operation of a particular site is a matter that is closely regulated by both the WPA, to ensure that conditions attached to the planning permission are adhered to, and the Environment Agency under licensing arrangements. The EA track movements of hazardous waste and monitor sites to ensure their ability to receive specified hazardous waste and operate to a high standard whilst minimising harm to the environment.

***Current Hazardous Waste Management in Gloucestershire***

4.76 Hazardous waste managed in Gloucestershire is predominantly landfilled. The Region's total hazardous waste landfill capacity of 184,000 tpa is dominated by the Wingmoor Farm (East) site, to the west of Bishops Cleeve. Whilst it has a significant voidspace for hazardous waste, the site's planning permission expires in 2009. Future operations will be dependant on the submission of a new application to extend the end date for operations, should the operator choose to do so. The site is also situated on Green Belt land.

4.77 The current situation in Gloucestershire has evolved and become established over time through businesses making decisions based on commercial viability. Whilst the physical presence of a hazardous waste management facility with planning permission and waste management (PPC) license, may infer acceptability of the operations, in practice this situation has come about due to a wide-ranging set of circumstances including commercial decisions by waste operators to take account of a changing regulatory regime. No exclusive hazardous waste capacity was ever originally permitted by the WPA but has been created through a market reaction to changing circumstances by applying to alter site waste management licenses.

4.78 Due to a number of factors an imbalance has arisen at this site between remaining life and permitted completion date. Commercial decisions by the operator in terms of waste types accepted (through application to vary the waste management license) have resulted in separate cells being created for APC and other industrial process residues. Additionally co-disposal regulations have meant that the site is now operating as two separate activities, one for non-hazardous biodegradable wastes and the other for hazardous materials. As a result the site (including both hazardous and non-hazardous landfills) is unlikely to be finished by 2009, including restoration to the agreed levels.

4.79 The implementation of the Landfill Directive (precluding co-disposal), in combination with the above, has resulted in Wingmoor Farm East (hazardous element) becoming a

nationally significant site for disposing of hazardous waste[33]. In view of the site's time-limited consent there is the potential that a planning application to continue working will be submitted by the operators sometime in the next few years. In determining such an application the WPA must consider its appropriateness against current planning policies[34]. Key considerations being an assessment of "*environmental acceptability*" and "*cumulative impact*" on host communities (please refer to Sections 3 and 5, in particular Issues W7 and W8).

### Agricultural Waste

4.80 Until 2006 agricultural wastes were not a 'controlled waste'. Agricultural waste is waste from premises used for agriculture. 'Agriculture' is defined by the Agriculture Act 1947, and the Agriculture Act (Northern Ireland) 1949', and includes:

- Horticulture;
- Fruit growing;
- Seed growing;
- Dairy farming and livestock breeding/keeping;
- The use of land as grazing land, meadow land and nursery grounds; and
- The use of land for woodlands, where that use is ancillary to the farming of land for other agricultural purposes.

4.81 Agricultural wastes include, for example, waste silage wrap, waste pesticide containers, waste pesticides, scrap machinery, waste oils and waste veterinary medicines from farms. The tonnages of these wastes that are generated in Gloucestershire are set out in Table 20.

**Table 20 - Agricultural Wastes**
Source: Strategic Waste Management Assessment 2000 South West

| Nature of Material | Tonnes in 1998 | Tonnage up to 2018 |
|---|---|---|
| Compostible and Digestible | 1,059,843 | 10,598,430 |
| Combustible | 41,709 | 417,090 |
| Difficult and Chemical | 13,484 | 134,842 |
| Other (scrap machinery/milk) | 766 | 7,660 |
| **Total** | **1,115,802** | **11,158,022** |

4.82 Due to the lack of more up-to-date information it is assumed that the Strategic Waste Management Assessment 2000 South West figure has remained relatively constant. When considered alongside the 'traditional' waste streams it is clear that agricultural waste comprises a considerable tonnage. However, potentially only a small proportion of that waste would need to be handled by new/additional waste management facilities.

4.83 The majority of compostable/digestible material is assumed will be composted/reused on site (subject to EA licensing) as fertilizer/soil conditioners. The difficult/chemical element is likely to be included in the hazardous waste stream and scrap machinery can be taken to metal recycling facilities (scrap yards). The combustible element (which is largely plastics and straw) is likely to have the greatest impact on land-use facilities as these will need to be either re-used/recycled or disposed to landfill.

[33] Stated in the South West Hazardous Waste Treatment and Capacity Report 2005

[34] An application would fall to be judged against currently the WLP (where consistent with PPS10) and eventually the criteria to be set out in the Waste Core Strategy and any other DPD documents should they be adopted by then. Any such policy criteria need to be in conformity with PPS10 and the RSS.

## Section 5
## The Issues and Options for Gloucestershire

5.1 Waste, and what to do with it, is an issue that is the responsibility of everyone. Each member of the community needs to play a role in reducing the quantity of waste that they produce. This means that it is necessary for individuals to move towards more sustainable waste management practices both at home and in the workplace.

5.2 Giving residents the opportunity to recycle is the responsibility of local authorities through source segregation collection regimes, HRC provision and bring facilities. For commercial wastes it is a matter of allocating sufficient sites for the waste industry to provide facilities to give businesses genuine opportunities to use their waste materials as a resource. Both of these are based on the principle that people are more likely to recycle if they are given the opportunity to do so.

5.3 The key issues which the WCS needs to address are listed below. Each has been given a reference (for example W1.) so that when making your representation by completing the standard form you can clearly identify to which issue you are referring.

**Key Issues for the Waste Core Strategy**

W1. Setting an appropriate spatial vision and objectives for the WCS;

W2. Determining the time period over which the WCS operates;

W3. Implementing the waste hierarchy - reducing the amount of all types of waste we produce, but where waste does arise to increase recycling and divert it from landfill;

W4. Adopting a strategy for making appropriate provision for waste management facilities;

W5. Setting out a spatial strategy - selecting criteria to use for identifying suitable sites for waste management operations;

W6. Implementing the Joint Municipal Waste Management Strategy (JMWMS) for Gloucestershire's household waste;

W7. Determining what factors should be used in assessing the cumulative impact on local communities;

W.8 Making an appropriate contribution to local, regional and national hazardous waste management requirements;

W9. The appropriateness of new proposals for waste management facilities in the Green Belt;

W10. Policies for dealing with proposals for new waste management facilities in other nationally designated areas;

W11. Strategic Environmental Appraisal and Sustainability Appraisal;

W12. Whether there are any other key issues that need to be included?

5.4 For each issue a number of questions are raised relating to how sustainable waste management can be delivered in Gloucestershire. These are set out on the standard form (a list of the questions it contains is set out in Appendix E) and we would appreciate your views on both the issues and options/questions.

5.5 The questions provide a pointer as to different options that can be adopted. These are not exclusive. The exact nature of options will depend to an extent on the vision that the WCS adopts and its' associated objectives. In the interim, options are framed in the form of questions to provoke stakeholder debate and stimulate discussion with the ultimate aim of generating consensus between parties as to what constitutes the best approach for the county to adopt. The intention is not to preclude consideration of a wide range of responses at this early stage.

5.6 Policies will need to be developed against which planning applications for waste management facilities can be determined. In some instances these could be transferred from the WLP (as 'saved' policies) into the WCS. Where such an approach is proposed for a given policy issue, these are set out below. In other instances new policies will need to be drafted, and the wording will be dependant on stakeholder responses to this consultation document. An exception to this is the spatial vision (see Issue W1.), where it was considered necessary to provide a draft vision in order to stimulate debate and provide a basis for setting objectives/principles.

**W1. Determining an Appropriate Spatial Vision and Objectives for the WCS**

5.7 To prepare the WCS it is necessary to set out a spatial vision, or aim, as to what we ultimately want to achieve through preparing the document. Fundamentally the spatial vision for sustainable waste management in Gloucestershire needs to take the following matters into account:

- Driving the management of waste up the waste hierarchy;
- Taking communal responsibility for managing the waste produced within the County; and
- Safeguarding Gloucestershire's environment, including its residents, from the adverse impacts of waste management.

5.8 Following consideration of the visions set out in the RWMS[35], the Gloucestershire Community Strategy, and the aims of District Community Strategies (outlined in Section 3), an interim spatial vision for the WCS is set out below. It is:

***"A sustainable and educational waste management system for Gloucestershire that reduces waste produced from businesses and households as a priority and diverts waste from landfill."***

5.9 Gloucestershire's different character areas are outlined in the spatial portrait of the County (see Section 2). Key geographical aspects of Gloucestershire are highlighted, including urban rural contrasts, topographic distinctions, areas of population concentration and growth, and the main transport network/modes.

5.10 From the interim spatial vision a set of principles on which to base the WCS have been derived. Provisionally it is proposed that these should be based around the themes set out in PPS10 and the emerging RSS (as identified in Section 3). These principles are:

- To minimise the generation of waste at source;

[35] The vision of the RWMS is that "the South West Region will become a minimum waste producer by 2030, with business and households maximising opportunities for re-use and recycling" (Appendix A, pg.60).

- To maximise opportunities for people and businesses to recycle, compost and recover value from waste;
- To provide an integrated and sustainable waste management system for the county, including methods for disposing of unavoidable waste in the most appropriate way; and
- To take responsibility for managing waste proximate to its source of arising.

5.11 Translating principles into aims and objectives will help to deliver the vision. The Adopted WLP includes 12 key objectives, which were set to achieve the aim of the WLP over the period to 2012. Although prepared under PPG10 guidance the WLP has only recently been adopted and consequently incorporates many current ideas on how to implement sustainable waste management. Subsequently, many of the WLP's aims and objectives remain applicable to meet the interim spatial vision. They are reproduced below incorporating amendments and additional aims to take account of changes to national planning policy and the outcome of the joint waste forum in March 2006:

1. To reduce the amount of waste produced in Gloucestershire;

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

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

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

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

6. To ensure that waste management issues are properly considered and incorporated into new development proposals;

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

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

9. To make the best use of land by re-using previously developed sites in preference to undesignated green-field locations;

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

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

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

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

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

**What would be your Vision and objectives for the WCS? Please see Questions for Issue W1. on the standard response form.**

### W2. Setting an Appropriate Timeframe for the WCS

5.12 It is important to clearly define the time period over which the waste development plan documents are to operate as this will impact on the capacity for which provision needs to be made. The adopted WLP was prepared with a time horizon up to 2012. This plan is 'saved' under transitory arrangements for a minimum period of three years, or longer with Secretary of State approval. In reality, as DPDs are prepared and adopted these will incrementally replace previous WLP policies and preferred sites.

5.13 National policy requires the WCS to look forward for a period of at least 10 years from the date of adoption. The M&WDS indicates that the WCS should be adopted by mid 2008. Consequently the timeframe for the WCS should be up to at least 2018.

5.14 Guidance in PPS10 states that the Regional Spatial Strategy should look forward for a 15 – 20 year period. This period needs to be sufficient to prove attractive for industry investment but not to constrain movement up the waste hierarchy. The RWMS sets out waste 'apportionments' up to 2020, which also reflects the furthermost target year for LATS requirements. It may also be appropriate to look to 2026 as this is the long-term horizon to which the RSS is working.

5.15 A timeframe to 2018 would provide a WCS life of 10 years. Up to 2020 would be 12 years, and if the RSS adopts a longer timeframe to 2026 this will provide for a WCS time period of 18 years. The longer the WCS timeframe the less precise it will be able to be towards its latter end. This will be for a number of reasons: new technologies coming on-line; differences in waste growth; potential changes to waste composition (for example the transition from manufacturing industries to service based ones creates different types of waste); new planning policy (at all levels); changing public aspirations as to how/where waste should be handled.

5.16 It may be that the WCS will be reviewed a number of times over its operational life as issues change. The preparation of an annual monitoring report will guide the extent to which any DPD needs to be reviewed. However, one option is for the WCS to follow a two-tier approach whereby the strategy for it's 10 year period is set out in detail and a more general approach is provided for the 'post 2018 period' to tie in with the emerging RSS.

**Over what timeframe should the WCS operate? Please see Questions for Issue W2. on the standard response form.**

### W3. Implementing the Waste Hierarchy

5.17 The waste hierarchy is central to sustainable waste management. The hierarchy should provide the basis for determining which mode (re-use, recycling, recovery, disposal) is the most appropriate for dealing with particular wastes.

5.18 For C&D and C&I wastes the technological process chosen within that mode is essentially a matter for the waste industry to determine in respect of factors such as their anticipated waste types, throughputs, clients, costs, existing infrastructure etc. However, the industry is

still charged with moving to modes further up the waste hierarchy. To this end the WCS should provide opportunities for people/industry to undertake these activities where appropriate and thereby divert waste from final disposal.

5.19 For MSW the JMWMS will set out the preferred technological process for the management of this waste stream. This could range from specific requirements to a more broader range of options for waste management processes. Any contract, which the County Council let as Waste Disposal Authority, should be in line with the JMWMS. Although in practice contractual issues, adoption of the JMWMS and the assemblage of sites might not always follow a linear timetable.

5.20 Preventing the generation of waste is at the top of the hierarchy. This is often referred to as 'waste minimisation'. The adopted WLP contains a waste minimisation policy, which is subsequently being expanded through preparing a supplementary planning document (SPD). The intention of the new style planning system to be more 'spatial' through embracing a wider ranging set of policies means that waste minimisation is a key spatial component of the WCS. Consequently, although policies to promote/deliver waste minimisation may not be explicitly 'demanded' by the market there is a policy need. It should be noted that initiatives such as the Landfill Directive and taxation of aggregates/landfill are providing extra market incentives for minimising waste.

5.21 Preparation of the Waste Minimisation SPD is currently well under way. Following an extensive period of evidence gathering and informal stakeholder consultation, a preferred version of the SPD has undergone formal public consultation for a six week period (April – June 2006). The SPD is likely to be adopted prior to the publication of a preferred option for the WCS.

5.22 Options for taking forward the waste minimisation policy in the WCS are whether to roll forward WLP Policy 36 as it is currently written or to revise Policy 36 to reflect a more strategic level, which could incorporate the latest thinking on implementing waste minimisation (taking account of the SPD's expert group consideration and extensive stakeholder consultation). A principal issue being the inclusion of a threshold for requiring submission of a waste minimisation statement as part of a planning application, with all other developments being encouraged to abide by the SPDs wider principles.

5.23 Re-use, recycling and composting should be maximised so that waste materials are seen as a resource rather than a burden. These aspects are considered in more detail in respect of Issue W6 "Implementing the JMWMS".

5.24 Recovering value from residual waste rather than burying it is an important aspect of the waste hierarchy. Once recycling and composting has been maximised the issue of recovering energy from the residual waste needs to be addressed. The financing and building of facilities to undertake these operations is principally a matter for the waste industry, although with regard to the management of MSW the JMWMS could influence the approach taken by the County Council as WDA.

5.25 In order for such facilities to come on-line there has to be a market demand, which could be influenced by policy drivers and fiscal measures such as the landfill tax encouraging waste away from disposal. The issue for the WCS is to provide appropriate provision for capacity at all levels of the waste hierarchy to come forward in line with targets set by national and regional planning policy (as outlined earlier in this document in Section 3).

5.26 The theoretical requirements over the plan period should be set out in the WCS with sites subsequently allocated in a site specific DPD as appropriate. Where a waste management facility accords with an up to date development plan the requirement for an applicant to demonstrate a market or quantified need has been explicitly removed by PPS10. However, where proposals come forward on sites not in the development plan, or circumstances change, a strategy is required to assess such proposals. The criteria should reflect those matters that form part of the consideration for selecting sites in the Site Allocation DPD.

5.27 'Need' can be embodied in two ways. It can reflect what is required by policy (i.e. the need to pursue the waste hierarchy or to meet national or regional planning targets) but it can also

relate to 'demand' (i.e. what the market wants). Need and demand are therefore potentially two different things and the latter does not necessarily coincide with the waste hierarchy. For example, where waste is produced the waste hierarchy will always seek to drive waste management towards re-use/recycling/composting, whereas the waste industry may wish to invest in a particular type of facility for commercial reasons. There consequently needs to be a balance between aspirational aims and what is reasonable and practicable to achieve. There is little benefit in a strategy identifying unfeasible and unrealistic outcomes/solutions for the future management of waste.

5.28 One of the key planning objectives of PPS10 is that a framework needs to be provided whereby communities take more responsibility for their own waste. The term "communities" in this sense could include residential or business communities. Where new development is proposed this will increase the generation of waste, whether industrial/manufacturing residues, office materials or residential waste. The provision of suitable facilities for managing this waste should not be overlooked by developers or planning authorities. Therefore, in a similar way to providing community facilities such as schools, libraries, community centres and road improvements, there should also be a requirement for the provision of suitable facilities to handle waste.

5.29 There are a number of mechanisms for requiring developer contributions. The two most common ways are through legal agreements (called section 106 agreements) and through planning conditions. The former is most often used to provide a percentage of the money required for the community development. An alternative could be for the developer to allocate an appropriate part of their site, or even to build the facility (for example a waste paper collection facility proximate to business development to encourage recycling of this material). Site allocations could potentially be secured by use of planning conditions and a clearly marked site plan.

5.30 The Government is currently looking at combined heat and power facilities. To be most effective these would need to be carefully planned in relation to new developments where the benefits could most readily be incorporated. For example in mixed use developments where commercial and residential heat/power is likely to be required at different times during the day.

**How should we be implementing the waste hierarchy? Please see Questions for Issue W3. on the standard response form.**

**W4. Strategy for Making Appropriate Provision**

5.31 The strategy for making appropriate provision is arguably one of the most important issues to resolve as all other waste development plan documents that are prepared will need to be in accordance with the adopted approach. The WCS strategy must accord with national and regional planning policy. Consequently, an overarching policy needs to set the strategy context for the WCS. This should be directly linked to the spatial vision and key objectives (see Issue W.1).

5.32 The strategy set out in the WLP was based on a dispersed network of 'local' facilities supporting a smaller number of more centrally located 'strategic' operations. Although the WLP was only recently adopted it was based around using the BPEO methodology to demonstrate sustainable waste management systems for Gloucestershire. BPEO sought to deliver sustainable waste development through an assessment of proximity issues, regional self sufficiency and 'need', all of which have been revised in national waste policy, as discussed in Section 3 above. Those policies in the adopted WLP that refer to these issues require revision in order to be consistent with Government policy.

5.33 Notwithstanding the change in national policy the goal of attaining a sustainable waste management system remains a key objective for the WCS to address. The following proposed draft policy has been prepared to replace the overarching policies in the Structure Plan (Policy SD.22) and WLP Policies 1, 2 and 3. The second part of the policy provides an 'interim' position for determining waste related planning applications prior to the adoption of a Development Control DPD.

***Sustainable Waste Management in Gloucestershire (draft policy)***

***Provision will be made in a site specific DPD for a network of waste management facilities that comprise a sustainable waste management system in Gloucestershire. Proposals for waste development will only be permitted where they can be demonstrated to contribute to a sustainable waste management system for Gloucestershire.***

5.34 The supporting text to this policy needs to define those elements that are considered to represent a sustainable waste management system in the County and embody the key objectives for the WCS (set out in draft form in Issue W1). As an example, specific issues could include:

(a) Implementing the waste hierarchy;
(b) Encouraging communities to take responsibility for the waste they produce;
(c) Maximising opportunities to divert waste away from landfill;
(d) Making sufficient provision for facilities at the right time;
(e) Safeguarding interests of acknowledged importance.

5.35 The role of the WCS is to set the context for making appropriate provision for waste management capacity in a site specific DPD. This context needs to be clear enough to allow the appropriate provision of capacity to be made, but the strategy also needs to flexible enough to respond to changing circumstances in a fast moving industry so that innovation in line with the waste hierarchy is not stifled.

5.36 Provision is based on the analysis of data in relation to existing and likely future requirements. Section 3 set out the targets that we are required to meet and section 4 presented a picture as to the County's current position. When combined this 'gap' denotes the additional provision that should be identified. Table 21 summaries the broad requirements for Gloucestershire up to 2020.

**Table 21 – Summary of Waste Management Capacity Required up to 2020 in Gloucestershire ('000 tonnes per annum)**
***The figure in brackets is currently permitted capacity.***

| Waste Stream | Type | Composting | Recycling / Transfer | Recovery/ Treatment | Landfill |
|---|---|---|---|---|---|
| **MSW** | Non-Haz | **90** *(50*)* | **80** *(52+39)* | **200** *(0)* | Current situation outlined in Section 4 to be closely monitored |
| **C&I** | Non-Haz | *(4)* **200** | *(68)* | **260** *(120)* | |
| | Metals | n/a | *(350)* | | |
| **C&D** | Inert | n/a | **180** *(581)* | | |
| **Hazardous** | Haz | Provision will be made through a criteria based policy | | | |

**Notes**
* The 50,000t permitted capacity is solely for windrow composting. Around 80,000t of the 90k is likely to be required for in-vessel operations – see Section 4.

5.37 The three key types of facility that the plan needs to make provision for in the early years are mixed organic composting facilities, sites for recycling C&I waste and sites for treating/recovering biodegradable waste (both MSW and C&I). Beyond 2018/19, or even 2015, there may be a requirement for additional disposal capacity, however this situation

requires careful monitoring due to the assumptions used for calculating time left (see Section 4).

5.38 Options for planning for future waste management facilities are likely to reflect the potential future capacities needed in conjunction with the approximate size of site required. However, assumptions have to be made, particularly in terms of maximum capacity of sites and the lifespan of landfill operations. By building in a degree of flexibility into the WCS this will prevent it from becoming quickly outdated as more data becomes available.

5.39 Flexibility can be attained in one of two main ways. Either through seeking to allocate more sites within a site allocation DPD than will potentially be needed to allow for greater market demand/choice, or through deliberately identifying fewer sites but using criteria based policies to allow certain types of waste management facility to come forward to drive management methods towards the upper end of the waste hierarchy. Potentially a combination of the two may be required. But if a strategy of additional provision were followed the amount of extra provision would need to be considered (for example +10%, +20%, +30% etc.).

5.40 The adopted WLP identified a number of sites for waste management operations that, subject to review, could potentially be rolled forward into the site specific DPD. These are currently divided between strategic (50,000+ tpa) and local (less than 50,000tpa), and also between preferred sites and areas of search. These delineations are 'saved' under the transitory arrangements until replaced in a site specific DPD. This site allocation DPD will be prepared following adoption of the WCS.

5.41 The benefit of identifying sites in a development plan is that it gives a degree of certainty for communities and developers as to where waste development is most likely to take place. This is achieved in the WLP through Policies 4 and 5. In practice however this is not always the situation. Of the 44 waste related proposals submitted in 2004/05, 38 were on sites outside of those allocated in the WLP. These were either on existing waste management sites not identified in the WLP (29) or on completely new sites (9). Of the remaining six that were on WLP preferred sites, three were approved, one was refused, one remains undetermined and one was withdrawn. The majority of these applications were for relatively small/minor operations or amendments to existing sites.

5.42 For proposals outside of allocated sites the starting point for consideration is currently Policy 6 of the WLP. However, one of the tests in Policy 6 is for applicants having to demonstrate why those in the WLP are not suitable. This therefore adds an additional test that potentially may restrict the amount of composting/recycling that should be undertaken in the County. To overcome this, other WPA's have adopted a strategy of dealing with proposals for waste management activities towards the top end of the waste hierarchy by way of a criteria based policy. The idea being that by creating a level playing field this should encourage proposals to come forward. It also increases the potential for competitiveness in line with PPS10 and will give the WCS greater flexibility over its duration. Whichever approach is followed will need to be justified in light of PPS10 requirements for site specific allocations.

5.43 For areas that are likely to experience significant change, or development pressure, there is the possibility that an Areas Action Plan (AAP) could be prepared. A key feature of AAPs is the focus on implementation, for example specific policies applying to certain areas in relation to conservation or enhancement, or particular design requirements and areas which will be subject to specific controls over development.

**What strategy should we adopt for making provision for waste management facilities? Please see Questions for Issue W4. on the standard response form.**

## W5. Criteria for Determining Site Locations (the Spatial Strategy)

***Preparing a Spatial Strategy***

5.44 Although the WCS does not contain site specific allocations, it needs to provide the strategy and framework which will enable sites to be identified through preparation of the Waste Site Allocations DPD. This is what is termed its' spatial strategy. It is important to develop a clear policy framework for either identifying sites, or criteria against which any site that may come forward (existing or new) can be appropriately judged.

5.45 A number of sites will ultimately have to be identified in the Waste Site Allocations DPD. However, there is rarely such thing as the 'perfect' site with regards waste management. Therefore determining which sites should be selected will require a balance to be made between competing interests. The principle issue in determining a framework for identifying sites is to prioritise what factors are most important when comparing one site against another. Planning Policy Statements (and PPG's where not yet replaced by PPS's) set out the context within which the Government considers decisions should be made. The framework approach needs to be in conformity with PPS guidance (in particular PPS10), Waste Strategy 2000 and the RSS.

5.46 The relative weighting of issues however remains, to an extent, a matter for local debate through the development plan preparation process. For example, there could be debate as to whether landscape should have a higher priority than nature conservation? Or should highway/transport accessibility and infrastructure be given greater weighting than residential amenity? And which is the most important factor to consider overall? However, each site that is considered will have is own individual factors that make it different from another. Consequently it is difficult, if not impossible, to provide definitive weightings that apply countywide in all instances.

***Mode and Process***

5.47 In terms of particular waste uses on a site, when preparing the site specific DPD there are different levels of detail relating to 'mode' and 'process' options. The *mode* relates to the level in the waste hierarchy (reduction, re-use, recycling, recovery, disposal) whereas *process* concerns the technological implementation of waste management (e.g. MBT, anaerobic digestion, in-vessel composting, MRF, pyrolysis, gasification, landfill etc).

5.48 There are many different technological processes that can be used for managing waste. However, the WCS should avoid prescribing particular waste management solutions for particular waste streams. This is because it is a matter that will be heavily influenced by the market and what the waste industry considers prudent to invest in. Being over prescriptive may also stifle innovation, preclude industry investment, and result in the DPD becoming quickly out dated. PPS10 identifies that an exception to this could be where a recently adopted JMWMS identifies preferred technology options for MSW.

***Location, Location, Location***

5.49 In terms of location, for Gloucestershire making provision relies on reconciling potentially contrasting 'solutions' that centre around 'locational' issues: town versus rural locations (including green belt issues); small (local) versus larger (strategic) facilities; central versus dispersed locations; existing versus new locations. These should not be seen in isolation of each other. It may transpire that one, or a combination of these matters form an appropriate strategy for the WCS to adopt. In addition there are also issues of what availability there is of brown-field/employment land which could be suitable for waste management facilities.

5.50 It stands to reason that town areas (loosely defined as those places where a significant number of people live/work) produce proportionally more waste than rural areas (MSW, C&I and C&D). Cheltenham and Gloucester City combined account for over a third[36] of all municipal waste collected in the County. However, locating waste management facilities to deal with this waste in close proximity to residential areas has historically met with resistance from affected communities. Improving environmental performance of waste operations

[36] For MSW arisings in 2004/05 the combined total for Cheltenham and Gloucester City was 113,612t equating to 37% of the County's total.

combined with increased public awareness of waste issues should help to address this matter.

5.51 In addition the land surrounding some of the County's main built-up areas is designated as Green Belt. This carries with it its own tests of what is and is not appropriate development. This is detailed in issue W9 below.

5.52 In contrast, the voidspace for landfilling waste residues is largely in semi-rural locations. In Gloucestershire there are currently three main areas in which landfill disposal sites are situated. Two are adjoining or near to built-up areas: Hempstead in Gloucester and the Wingmoor Farm sites at Bishops Cleeve. The third, Frampton landfill site, is in a rural location to the south of the County. The sites at Hempstead and Frampton are likely to be completed within this plan period and one of the Wingmoor Farm sites has a time limited planning permission to 2009 (although potentially significant voidspace will remain at this latter site).

5.53 If additional landfill voidspace is required during the plan period the 'choices' as to locations are considerably more limited than for other types of waste management facility. Specific issues that need to be borne in mind additional to normal considerations include: the geology must be correct; technical suitability; and the high landtake required (see also Issue W4.5).

5.54 Locating waste sites in rural areas can be perceived as removing the 'problem' from the main waste producers to those who proportionally produce less. Whilst the relationship with sensitive land-uses is potentially lessened the knock-on issue is that transportation distances are likewise increased. PPS10 relates proximity issues to disposal facilities, implying that those facilities which manage waste further up the hierarchy could acceptably engender greater haulage distances. An important matter to consider is the capacity of the existing or potential transportation infrastructure to handle anticipated vehicular movements. Additionally, where practicable, sustainable modes of transport should be encouraged.

5.55 The town versus rural consideration is therefore closely linked to the small versus larger facilities debate. Larger facilities offer economies of scale, restrict impacts to fewer areas, focus attention on key areas and provide a potentially greater incentive for the waste industry to invest in more innovative methods of management. However, they carry a risk in that if an anticipated large facility is not put forward by the waste management industry then this can lead to a significant shortfall in waste management capacity. Larger facilities also require a network of local transfer (bulking-up) facilities to serve them otherwise they will result in a large number of lorry movements from across the county.

5.56 Smaller facilities may offer the benefits of communities taking responsibility for their own waste, but by their nature a considerable number are required around the county to form a proper network of sites. This includes provision in the rural parts of the County or areas of more dispersed population. If a number of these do not come forward then the risk is that waste is transported greater distances to facilities that potentially do not have the capacity to deal with the extra material from other communities. Conversely, for pre-treatment technologies, such as MBT and EfW, the size of facility will to a certain extent be dictated by investment costs and throughput economies of scale. Consequently these latter type of operations are likely to be relatively larger than 'local' community facilities.

5.57 To an extent this is reflected by the central versus dispersed locations discussion. A central facility would handle/process the majority of the waste from around the County and is likely to be located in or near to the main arisings from Gloucester/Cheltenham. Waste would be transported to it from a network of transfer stations. A dispersed strategy would utilise a large number of small 'local' facilities for handling waste arising in its locality (the catchment would most likely be dependant on the size of the facility and on where other sites are located). Again the dispersed location would include the more rural parts of the County. The residues from either approach would still require final disposal, which for the next 10 years will be at one of the County's four main landfill sites.

5.58 Previously, criteria that have been used when searching for suitable site locations for waste management operations include: brownfield and despoiled land; industrial areas; existing mineral sites; sites with sustainable transport links (water/rail) and suitable strategic road

links; employment land; and the potential impact on environmental designations. These were derived from PPG10 and were used when preparing the now adopted WLP.

5.59 There are 'tables' set out on the Options question form (set out in the back of this document) that reflect the alternative approaches discussed above. They also highlight factors that were considered at a Waste Forum event (in Gloucester on 22nd March 2006) which concluded that a balance needs to be struck between the requirement to have facilities to deal with waste and the potential impacts on interests of acknowledged importance, for example: landscape; residential amenity; highways; wildlife etc.

**What spatial strategy should we adopt for identifying sites? Please see Questions for Issue W5. on the standard response form.**

**W6. Implementing the JMWMS**

5.60 One of the roles of the WCS is to identify suitable sites where waste development processes identified in the JMWMS could take place. The JMWMS is currently being prepared by the GWP. It will set out the County's strategy for managing MSW. The intention is that it will set out the preferred processes that will be employed to manage that element of the waste stream. Until this strategy is adopted the land-use requirements in terms of the specific MSW facility types required will not be known.

5.61 The timetable for preparing the JMWMS is:

| | |
|---|---|
| **Evidence Gathering** | **November 2005 – January 2006** |
| **Collation of Results** | **January 2006 – February 2006** |
| **Internal Stakeholder Workshop** | **February 2006 – March 2006** |
| **Collation of Results** | **March 2006** |
| **Public Stakeholder Forum** | **March 2006** |
| **Produce Draft Strategy** | **Summer 2006** |
| **Public Consultation** | **Autumn 2006** |
| **Revise Draft Strategy** | **Winter 2006/07** |
| **Submission/Adoption** | **Spring 2007** |

5.62 If you wish to make representations to the County Council (on behalf of the seven waste authorities) concerning the options that are proposed to manage MSW then the key time to get involved with preparation of the JMWMS is in June – August 2006. This is when formal public consultation will be undertaken by the WDA following initial internal evidence gathering and the pubic forum in March 2006.

5.63 Once the JMWMS has been adopted it will need to be taken into account when we are preparing the WCS Preferred Option. It is not the role of the WCS to re-visit the JMWMS process options, provided these are clearly stated. To do so could potentially result in a fundamental conflict that would prejudice delivery of the JMWMS through the MSW contract. However, views on this matter through the WCS Issues and Options Paper are welcomed at this time so that they can feed into the JMWMS consultation (June – August 2006).

5.64 The WCS will implement the JMWMS by providing the framework for identifying suitable sites for the stated facility types that will be required. The approach to making 'provision' in development plan documents however also needs to be in conformity with the strategy set out in the RSS. This was set out in Sections 3 and 4. There are however inconsistencies between regional (RSS) and national (LATS) requirements. For example, in 2013 the maximum biodegradable MSW that can be landfilled by Gloucestershire under LATS is

71,555t, whereas the RSS figure is a maximum of 130,000t[37]. Ultimately, this will require potentially further recycling, composting and the provision of treatment facilities to divert more BMW from landfill.

5.65 The regional target for secondary treatment of MSW (e.g. using MBT, thermal processes etc.) is a maximum of 200,000 tonnes by 2020. The preparation of Gloucestershire's JMWMS will need to consider the effect of RSS requirements on the strategy that it proposes. Although the tonnage levels, once adopted in RSS, should not be re-opened, if there is important new information that needs to be taken into account this can be accommodated with advice from the RPB, Government Office and other stakeholders[38].

5.66 Options for making provision for MSW facilities in the WCS relate to the level of detail that should be set out when sites are identified. These range from either: a highly flexible strategy (that seeks to make provision through a set of criteria based policies); or a rigid prescriptive approach that states particular facility types at particular locations. The weakness of these opposite approaches are that the first provides little certainty for communities or developers, whilst the latter may stifle recycling and composting initiatives and is likely to become out of date quickly as waste management technologies and community aspirations change.

5.67 Consequently, whilst it is important that the WCS provides a framework that is sufficiently flexible not to stifle innovation in line with the waste hierarchy, it is also important that sites identified in the Site Allocations DPD are suitable for a given set of uses. Consequently, there needs to be a balance between prescriptive site requirements (concerning what type of facility may be appropriate for a particular site) and the identification of sites that are potentially 'open-ended' in terms of the range of facilities they could accommodate[39].

**How should we implement the requirements of the JMWMS? Please see Questions for Issue W6. on the standard response form.**

### W7. Determining Cumulative Impact

5.68 PPS10 and its companion guide specifically highlight the need to consider the issue of cumulative impact on the well-being of local communities when assessing the appropriateness of existing sites for the purposes of making provision in DPDs. This is to be measured through consideration of environmental quality, social cohesion and inclusion, and economic potential. However, quantifying these elements will inevitably contain subjective aspects and may prove to be difficult to define. Consequently, it is important to resolve what constitutes cumulative impact prior to embarking on an assessment of the appropriateness of individual sites in a site specific DPD. By setting out the criteria in a policy framework this will provide a tangible set of factors against which 'cumulative impact' can be assessed.

5.69 Factors such as the number of measurable impacts on residential amenity, or the throughputs of waste, or the frequency of vehicle movements for example could provide indicators as to cumulative impact. Other issues that planning policy states should be considered include the impact of development on the social fabric of communities and seeking to reduce social inequalities. A key component of this is delivering safe, healthy and attractive places to live.

5.70 Conversely, PPS10 also suggests co-locating complementary activities (the eco-park concept), which it is stated will have the advantage of integrating waste facilities and driving waste management up the hierarchy. Where new sites are to be found, because existing

[37] Although the RSS figure includes 32% inert material and the LATS figure is solely biodegradable, there is still a discrepancy of over 16,000t.
[38] PPS10 paragraphs 13-14.
[39] For context, the adopted WLP identifies sites for a stated range of waste management options. In doing so it sought to differentiate between different recovery options / thermal processes. These were divided into two types: waste to energy incineration; and waste to energy not including incineration (incorporating processes such as pyrolysis and gasification).

ones are not considered suitable for expansion, industrial estates are identified as potentially being suitable for a variety of waste management uses.

5.71 Having determined what types of facility are needed, and decided on the approach to take in respect of identifying sites, it is necessary to weigh-up the relative merits of those matters that could be affected by the development of a waste facility. PPS10 sets out a number of locational criteria in the search for suitable locations for waste management facilities. These apply when considering new locations and also extensions at existing sites (see Options for W5.).

5.72 Another related issue is how existing waste management sites can be safeguarded from either re-development by other uses, or by encroachment from potentially incompatible land-uses. The WLP (Policy 7) seeks to safeguard existing and allocated sites for waste management facilities from incompatible land-uses. Development of non-waste activity encroaching on established waste management facilities can increase the likelihood of generating adverse cumulative impacts. This is an issue that therefore needs to be considered and addressed.

5.73 The new planning system seeks to avoid such incompatibility by requiring District planning authorities to identify minerals and waste sites on their Proposals Map. In two-tier local authorities, such as in Gloucestershire, this will have the benefit of raising awareness of locations to all parties involved.

5.74 The thrust of WLP Policy 7 is proposed to be substantively rolled forward into the WCS with some amendments. One option for a form of wording is:

> *Local planning authorities will safeguard existing and allocated sites for waste management use from encroachment by incompatible land-uses. The Waste Planning Authority will normally oppose proposals for development within or in proximity to these sites where it would prejudice the site being developed or used for appropriate waste management operations.*

**How can we assess 'cumulative impact' on communities, and should sites be safeguarded? Please see Questions for Issue W7. on the standard response form.**

**W8. Hazardous Waste Management Provision**

5.75 Hazardous wastes arise all across the country, including in Gloucestershire. In comparison with other waste streams managed in the County hazardous waste constitutes around 3% of the total. Despite this relatively small percentage these wastes still need to be managed somewhere and they need to be managed safely.

5.76 Different kinds of hazardous waste require different types of specialised facility to handle them. However, as tonnages across the country are relatively small this has lead to a proportionally small number of facilities serving a wider market area.

5.77 The WCS needs to provide a criteria based policy approach for assessing the suitability of any future planning applications that may be made for facilities to manage hazardous wastes. The term 'manage' encompasses facilities that transfer/bulk-up, reprocess and/or dispose of such materials. There are a number of options as to how such an approach could be framed. The overarching factor being the issue of making appropriate provision in Gloucestershire for managing hazardous wastes.

## Creating an Appropriate Policy Approach

### *National Policy*

5.78 PPS10 (paragraph 7) requires Regional Planning Bodies (RPB), and in turn WPA's (as sub-regions, of which Gloucestershire is one), to develop a realistic approach to future waste management, including for hazardous wastes. In doing so RPB's are required to take account of the likely demand arising from neighbouring regions, where meeting that demand would be consistent with PPS10. The revised text to the National Waste Strategy (July 2005) indicates that Defra and the EA are working towards preparing a methodology for determining the most sustainable options for particular hazardous wastes. However, despite this and PPS10 requirements, there remains an absence of detailed national guidance on this topic.

5.79 PPS10 requires RSS to take account of opportunities to accommodate new or expand existing facilities for the disposal of the residues of treated wastes. Criteria for identifying suitable sites and areas are set out in PPS10 (paragraphs 20-21). These will form an important point of reference for preparing policy options for managing hazardous waste.

5.80 The revised National Waste Strategy (July 2005) sets out eight issues that will need to be considered when developing the most sustainable option for managing hazardous waste:

1. Re-use, recycling or reclamation of waste either at the site of generation or elsewhere[40];
2. Reclamation of energy from waste;
3. Incineration without energy recovery. This may remain appropriate for certain waste streams such as polychlorinated biphenyl (PCBs), chloroflourocarbon (CFCs), pesticides and halogenated and non-halogenated solvents;
4. Constraints on landfill (including the implications of the Landfill Directive). Landfill may remain the appropriate option for some waste streams such as asbestos and some treated timber;
5. Specialised treatment to reduce hazardous properties even if this results in an increase in the quantity of waste;
6. Disposing of waste at the nearest appropriate installation, by means of the most appropriate methods and technologies;
7. Environmental receptors sensitive to the waste;
8. Existing and alternative management practices

5.81 Whilst the 'waste hierarchy' remains a key principle to follow, in terms of implementation for hazardous waste management it is not always applicable. Methods such as re-use, recovery or recycling might not be appropriate for many hazardous wastes. Whilst recovering oils, metals and certain chemicals may be possible, the financial cost of doing so in relation to the likely quantities is a key factor. Fundamentally reducing production of hazardous wastes has to be the preferred option (see section below).

5.82 The National Waste Strategy considers that deriving energy from waste may be a viable option (incineration without energy recovery may be appropriate for certain waste streams such as PCBs, CFCs, pesticides and halogenated and non-halogenated solvents). Landfill may remain the appropriate option for some waste streams such as asbestos, some treated timber, and air pollution control (APC) residues, but acknowledging that the Landfill Directive has constrained the market for landfill options. The final disposal should however be at the

[40] Re-use and recycling will not be appropriate for all hazardous wastes. Banned substances should not be re-used when they arise as waste and recycling should not result in the *spreading* of contaminants for example asbestos should be removed from feedstock for the crushing of demolition waste to prevent it spreading amongst recycled aggregates.

nearest appropriate facility. Given the nationwide nature of limited arisings this leads into locational issues of regional significance.

***Regional Planning Policy***

5.83 The South West Regional Planning Body is currently preparing a Regional Spatial Strategy (RSS) for the Region, which will include a specific policy on 'hazardous waste'. The supporting text to the hazardous waste policy in the emerging RSS outlines the position with regards hazardous waste management regionally. It states that the region is broadly self-sufficient in waste treatment capacity and has facilities for the transfer, treatment and recycling of hazardous wastes that are an integral part of a wider national network of facilities. However, it goes on to conclude that that the region needs an annual disposal capacity in the range 65,000 to 80,000 tonnes per annum. This effectively means landfill voidspace is required.

5.84 The proposed Regional policy for developing capacity for hazardous waste management facilities is set out in Section 3 of this Issues and Options paper. The indicative allocations for hazardous wastes, identified in the emerging policy as being in Schedule A, have yet to be presented in any emerging draft of the RSS so far. This will be critical in preparing a realistic approach for managing hazardous waste in the South West. Additionally, what constitutes 'environmental acceptability' needs to be determined (see section below).

5.85 A technical paper, South West Hazardous Waste Treatment and Capacity Report 2005, has been prepared by the EA for the South West RTAB to inform regional spatial planning policy for hazardous waste. This paper provides some of the detail that was absent from The Regional Waste Strategy for the South West 2004-2020. It identifies the likely capacity requirements across the South West for hazardous waste management facilities (including disposal).

5.86 The Capacity Report states that the current pattern of hazardous landfill sites reflects the commercial viability of the hazardous waste landfill market. Consequently hazardous waste disposal is now a highly specialised activity that operates in a market of at least regional and more probably national scale. It is in this context of a wider regional/national need that hazardous waste policies for Gloucestershire must be developed.

5.87 Due to the lack of detailed national guidance on hazardous waste planning, the emerging RSS policy W3 provides the basis for deriving an appropriate policy. It states, "*it is not considered appropriate for each waste planning authority to identify specific sites for the management and treatment of hazardous waste in the same way they are expected to identify sites for other waste facilities*". In support of this, national guidance warns against spatial precision at core strategy level.

5.88 However, as hazardous waste provision in the County predominantly, though not exclusively, relates to one disposal site there is the potential that any discussion around the issue will end up relating to that site. Notwithstanding this, it is important to develop a clear policy against which **any** site that may come forward (existing or new) can be appropriately judged. The policy needs to be in conformity with general PPS guidance (in particular PPS10), Waste Strategy 2000 and the RSS.

5.89 The options for managing hazardous waste relate primarily to selecting those criteria that the policy (and it's supporting text) should contain. The emerging RSS requires planning applications for hazardous waste facilities to be considered in the context of *"their contribution to national and regional need, and not just local need.*" In addition, provision needs to made in the policy's criteria for the potential for stable non-reactive hazardous wastes (SNRHW) cells at existing non-hazardous landfills (see section below).

***Local Planning Policy***

5.90 The detailed development plan policy for hazardous waste is Waste Local Plan (WLP) Policy (16). This policy is set out in the box below:

***Waste Local Plan - Policy 16 'Special Waste Facilities'***

**Policy 16**
FACILITIES FOR THE ADDITIONAL HANDLING, TREATING, PROCESSING OR DISPOSAL OF SPECIAL* WASTES WILL BE PERMITTED IF IT CAN BE DEMONSTRATED -

- THAT IT WOULD FORM PART OF A SUSTAINABLE WASTE MANAGEMENT SYSTEM; AND
- THAT IT WOULD MEET THE RELEVANT POLICIES AND CRITERIA OF THE DEVELOPMENT PLAN.

*** Please note:** Where reference is made to 'special' waste this has now been superseded by 'hazardous' waste, as identified in the Hazardous Waste Regulations (2005) which replaced the Special Waste Regulations (1996).

5.91 In order to align with regional and national planning policy statements it is proposed that this adopted policy in the WLP be replaced by a policy/policies in the WCS dealing with hazardous waste issues.

***Reducing Hazardous Waste Production***

5.92 A key aspect of the new style 'spatial' plans is that they go beyond traditional land-use planning. In doing so they can include policies which indirectly impact on land-use, for example by influencing the need for development. Minimising the production of hazardous waste reduces the need to have facilities to manage it. The County Council is currently preparing a Supplementary Planning Document (SPD) dealing with waste minimisation. One aspect of the SPD is to minimise the generation of waste during construction and demolition activities (including hazardous materials such as asbestos and paint). This comprises the most direct link between land-use planning and minimising hazardous waste production at source.

5.93 If hazardous waste was not generated, or in smaller quantities, then there would be a reduced need for facilities to manage it. This could provide the basis for a policy to encourage industry to produce less hazardous waste. However, a potential difficulty here is that some of the residues disposed of in Gloucestershire, for example from power plants and facilities that thermally treat waste, do not arise in the County. Therefore, the effectiveness of a policy in Gloucestershire's WCS to reduce the generation, or the hazardous nature, of these waste types at source in other Regions (for example the South East, West Midlands, and North West) is likely to be difficult to implement.

5.94 It should also be noted that only policies which can be implemented through the granting of planning permission can form the framework for making planning decisions[41]. Therefore, if a broader policy were introduced into the WCS to seek the minimisation of hazardous wastes at source, this may require other mechanisms for its implementation, for example more detailed policy in the Development Control DPD.

5.95 The National Waste Strategy is in the process of being re-written. Initial indications are that it will retain, as a process to be explored, the thermal treatment of waste to generate energy (Energy from Waste EfW). Currently around a tenth of waste handled in England is managed in this way. Depending on the process involved some EfW plants may produce small tonnages of hazardous wastes, particularly APCs. These residues from EfW plants will therefore continue to require treatment and final disposal. Gloucestershire's JMWMS is also being re-written and the process options it sets out could influence the type or types of waste that need to be managed (as explained previously in Sections 3, 4 and 5).

5.96 Options for the WCS in terms of encouraging the prevention of hazardous waste generation include:

[41] Under section 38 of the Planning and Compulsory Purchase Act 2004.

- Linking the 'hazardous waste' and the 'waste minimisation' sections of the WCS through the supporting text;
- Creating a separate policy in the WCS specifically dealing with minimising hazardous waste;
- Adding hazardous waste to a general waste minimisation policy to be included in the WCS.

***Stabilised Non-Reactive Hazardous Waste (SNRHW)***

5.97 The Landfill Directive prevents disposal of hazardous and non-hazardous materials in the same landfill site. Prior to 2004, provided a site that held both an appropriate planning permission and waste management license that covered both waste streams it could accept either category of waste into the same landfill. This is no longer the case, which has rationalised hazardous waste management across the country. The decision to accept either hazardous or non-hazardous waste, subject to the above approvals, has been a commercial decision for the operator of affected sites.

5.98 Some wastes that are hazardous can be stabilised and then landfilled in designated cells at a non-hazardous landfill site, provided the leaching characteristics are similar to non-hazardous wastes (subject to EA approval). These are referred to as Stabilised Non-Reactive Hazardous Wastes (SNRHW). However, where there is a designated hazardous waste landfill site that can accept those materials the issue is whether it is appropriate to make separate provision for such operations. To do so could restrict the non-hazardous voidspace available in such circumstances and could result in additional non-hazardous landfill capacity having to be identified.

5.99 Although tonnages of hazardous wastes are relatively small, they have a high disposal cost (specialist treatment, site engineering, transport etc.). Conversely, non-hazardous wastes arise in greater amounts but the need for specialist handling facilities means that management costs are less. As a consequence, the former requires fewer facilities, but greater transportation distances, whereas the latter attracts waste from a closer catchment area.

***Determining Environmental Acceptability***

5.100 Further to emerging RSS policy, the WCS needs to examine the options for determining what constitutes 'environmental acceptability' (please refer to the emerging RSS policy set out in Figure 4 [Section 3] above). Factors include: the type of facility; the material being handled; the existing topography; surrounding land uses; proximity to designated areas (such as SSSI's, AONB or Green Belt etc.); highways/access etc. Another aspect of 'environmental acceptability' could relate to the potential of the site to be satisfactorily restored.

5.101 If any parcel of land in the county were to be proposed for waste disposal there needs to be an adequate mechanism for assessing the future restoration of that site. The primary purpose of such a policy would be to ensure a satisfactory restoration scheme. Whilst such a policy would normally be included as part of the Development Control DPD, the data in Section 4 illustrates that managing hazardous waste transcends local, regional, and even in some cases national boundaries. Consequently, restoration of landfill operations (and in particular hazardous waste landfill) is potentially a strategic issue that could be included in the WCS as a key indicator of 'environmental acceptability'.

5.102 The County has a designated hazardous waste landfill site which is time limited through condition to remain operational up to 2009. In conjunction with this are issues relating to restoration as there is still significant voidspace remaining at this site. Either way this is a significant strategic issue to be addressed by the WPA and the South West Regional Assembly due to waste importation being in excess of 10,000 tonnes from a single Region (see emerging RSS paragraph 7.4.4, as set out above in Section 3). In addition, any proposal which comes forward to retain disposal capacity beyond 2009 will require careful assessment of environmental acceptability in line with the policy context in RSS Policy W3.

***Import and Export of Hazardous Wastes***

5.103 With regard to what may be the most appropriate type(s) of facility for Gloucestershire, consideration should be given to the categories of hazardous waste currently being produced in the county, and also to the 'waste hierarchy'. Section 4 outlines the types of hazardous waste that arise most prevalently in the county.

5.104 Hazardous waste that arises in Gloucestershire is produced by householders and businesses. Hazardous waste comprises numerous different types of materials, many of which require specialised facilities for their management. It is likely that only disposal facilities would be able to manage 'hazardous waste' in its generality, and even they may require specialised 'front-end' treatment equipment to stabilise particular elements of the waste. Consequently, it is necessary to be clear what is required in terms of specific types of hazardous waste.

5.105 The countywide arisings of most types of hazardous waste are very small, particularly in comparison with other waste streams. As a result it is unlikely to be economic for a number of different operations to be set up to individually handle only those arising from the County. However, this will result in potentially large amounts of our own hazardous waste being managed and disposed of outside Gloucestershire. This is borne out by the currently national market for managing these wastes, stated in the South West Hazardous Waste Treatment and Capacity Report 2005. To make a hazardous waste operation commercially viable it is likely to be necessary for it to accept waste from a wider catchment. The issue for Gloucestershire is what type, or types, of facility it is appropriate to accommodate in light of this national picture. In order not to perpetuate particular approaches to managing this waste stream, the emerging RSS suggests time-limiting permissions, but not so as to restrict the commercial viability of the operations.

5.106 The import/export of hazardous waste to and from Gloucestershire through existing sites is a commercial matter. However, when planning applications are submitted for new facilities these need to be considered in light of the wider (regional/national) picture. If hazardous wastes are to be sent to regional or national facilities then potentially a number of transfer operations could be required to facilitate this. The options relating to determining how appropriate a site is should be similar to those for disposal facilities, but would need to consider the temporary nature of the materials being on site and the smaller tonnages involved.

***Hazardous Waste Issues Summary***

5.107 In summary the key land-use planning issues for the management of hazardous waste in Gloucestershire are set out below. These include a combination of factors identified in the National Waste Strategy, PPS10 (paragraphs 20-21), the emerging RSS and the current situation for hazardous waste management in the County:

- Reducing the production of all types of hazardous waste at source as part of implementing the waste hierarchy;
- Seeking management on the site where it is generated, where this is not practicable disposing of waste at the nearest appropriate installation by means of the most appropriate methods and technologies;
- Making an appropriate contribution to Local, Regional and National need for managing hazardous wastes - determining what type/types of facility is appropriate in Gloucestershire;
- Gloucestershire has one of only two landfill sites in the South West where hazardous waste can be landfilled, and it is time limited to 2009;
- Determining what constitutes 'environmental acceptability' for an existing or proposed new site, including cumulative impact on communities (see issue W7.);

- The physical and environmental constraints on development, including existing and proposed neighbouring land uses and the proximity of environmental receptors that are sensitive to the particular waste;
- Specialised treatment to reduce hazardous properties even if this results in an increase in the quantity of waste;
- The availability of existing and alternative management practices, including the use of existing non-hazardous landfills for SNRHW cells;
- Give priority to the re-use of previously-developed land, and redundant agricultural and forestry buildings and their curtilages and industrial sites;
- Opportunities to collocate facilities together and with complementary activities reflecting the concept of resource recovery parks;
- The capacity of existing and potential transport infrastructure to support the sustainable movement of waste, and products arising from resource recovery, seeking when practicable and beneficial to use modes other than road transport.

5.108 The possible options that relate to these issues are set out on the standard form at the back of this document.

**What strategy should we adopt for managing hazardous waste? Please see Questions for Issue W8. on the standard response form.**

**W9. Green Belt**

5.109 There have been changes to national and regional guidance, Policy 35 of the adopted WLP is proposed to be re-drafted in the new WCS. One of the key objectives of PPS10 is to *protect green belts but recognise the particular locational needs of some types of waste management facilities*. Within this context PPS10 also makes reference to the need for considering the *wider environmental and economic benefits of sustainable waste management*. This could mean: reducing the distance that waste has to travel; the suitability of transport infrastructure (including highway access); job creation/retention at the site; restoration of previously used/de-spoiled land that contributes to the achievement of the objectives for the use of land in Green Belts; other environmental improvements in the longer term (for example landscape enhancement). Alternative options for replacing WLP Policy 35 are set out below.

5.110 Government policy in PPS10 requires the detailed definition of Green Belt boundaries to take account of the locational needs of waste management facilities. This implies that WPAs need to make some assessment of the boundaries in respect of the requirements for waste management facilities. If boundaries were to be proposed for amendment this would have to be undertaken in partnership with the relevant District Council(s).

5.111 The most obvious locational element in siting waste development is the distance between source of waste arising and the handling facility. Whilst such considerations were previously described (in PPG10) as relating to the 'proximity principle', this phrase no longer appears in national guidance. Instead, PPS10 seeks to enable waste to be disposed of in one of the nearest appropriate installations, and for communities to take more responsibility for the waste they produce. This is a different interpretation of what proximity means and one which needs to be translated into the WCS, both in the Green Belt policy and also in more general strategic policies.

5.112 Waste often requires more than one management facility to deal with it appropriately. For example, following collection, waste may be sent to a facility for sorting into different types, then bulked up, then sent to another facility for reprocessing (into other goods etc.) or sent to a landfill for final disposal. PPS10 seeks to co-locate such facilities together and in doing so the planning history of a site, for example previous and on-going operations will have a bearing in terms of attracting complementary or ancillary facilities. However, notwithstanding the co-location requirement, PPS10 also seeks consideration of the cumulative impacts of operations on the well being of host communities. This creates an apparently contradictory situation, the resolution of which will be fundamental to progressing site specific DPD's following adoption of the WCS.

5.113 The appropriateness of the geology and general surrounding topography are particularly relevant locational aspects for landfill operations. The underlying geology is fundamental to the ability to satisfactorily dispose of certain wastes without having to undertake prohibitively expensive engineering works.

5.114 The method of transportation will be another important consideration when considering site location in respect of the Green Belt. Where road transport is proposed the adequacy of the highway network, including site access is a key factor to take into account. For rail and water borne transport the presence of either rail track or a canal/river nearby is a pre-requisite. The cost of installing such modes is otherwise likely to be prohibitive.

5.115 Environmental benefits include aspects such as reclamation of de-spoiled land, good design of buildings, landscape/visual enhancement, access to the countryside by footpath creation etc. These can be seen as reflecting ‘before’, ‘during’ and ‘after’ scenarios. ‘Before’ relates to the current state of the land/buildings (including previous uses), the ‘during’ relates to the site’s operation and facility design), and ‘after’ concerns restoration issues of temporary sites (including benefit to the local ‘host’ community by for example creating recreational opportunities).

5.116 Good Design - The design aspects to WLP Policy 35 (“form, bulk and general design”) requiring waste management facilities to be in keeping with their surroundings echo the requirement in PPS10 (para.36) to contribute positively to the character and quality of an area. The statement that “poor design… should be rejected” is a strong affirmation of this principle and one which could be carried forward into the new policy. Criteria B of Policy 35 could be subsumed within a policy requirement relating to design. The detail could then be set out in the supporting text. This would have the benefit of making the policy more succinct.

5.117 Landscape/Visual Enhancement – PPS10 requires that in deciding which sites to identify for waste management facilities that priority should be given to the re-use of previously developed land and redundant agricultural buildings (including their curtilages). Where waste management proposals come forward on such sites in the Green Belt, PPG2 is clear that the re-use of buildings need not prejudice the openness of Green Belts provided that strict controls are placed on any re-development. Such re-development may offer the opportunity for environmental improvement without conflicting with Green Belt objectives.

5.118 Access to the Countryside – this is one of the objectives for defining land as Green Belt. It may be that following cessation of current uses that the restoration package can offer greater access to the countryside for the urban population, for example by provision of footpaths, cycleways, outdoor sport/recreation etc. Other issues include matters as diverse as restoration to improve nature conservation (biodiversity), or returning land to agricultural production.

5.119 Economic Benefits are considered to relate primarily to direct issues such as job creation, but it could also have an indirect effect on matters such as hauling waste over greater distances having a financial impact on municipal waste contract matters, which the taxpayer ultimately funds.

5.120 PPS10 has introduced new requirements with regards the demonstration of ‘need’ for waste management facilities. This seeks to encourage competition in the waste industry and states that *“when proposals are consistent with an up-to-date development plan, waste planning authorities should not require applicants for new or enhanced waste management facilities to*

*demonstrate a quantitative or market need for their proposal."* Consequently, the WLP Policy 35 requirement that a facility should be "*essential*" and "*genuinely required*" are now potentially contrary to national guidance if a facility is proposed on a site that is allocated in the Green Belt.

***Continued use of Green Belt land – boundary definition & restoration***

5.121 Some of Gloucestershire's key sites for waste management are located in the Green Belt. This includes both existing facilities and site allocations in the WLP. Together they make an important contribution to the management of waste in the County. This situation has arisen over many years, and evolved through commercial decisions and changes in waste management regulations. However, the boundary of Gloucestershire's Green Belt is currently being assessed through the RSS preparation process.

5.122 When delineating detailed Green Belt boundaries PPS10 requires the locational issues highlighted above to be taken into account. Consequently there is a potential opportunity to consider the appropriateness of the boundary in respect of waste management facilities. Additionally, the continued appropriateness of waste management activity in the Green Belt at a strategic level, rather than the particular merits of individual sites, is a matter that could be considered in the WCS. For example, ancillary waste management activities are often located close to main disposal operations for practical, operational, economic and environmental reasons.

5.123 The landfill sites were permitted following sand and gravel extraction and subsequent permissions to extract clay, landraise and re-profile restoration contours have contributed to the available voidspace. Two non-hazardous waste landfill sites annually accept around 2-300,000 tpa of waste (one principally from households, the other from commercial/industrial activities). Between them they have a voidspace capacity of around 7 million $m^3$. The third site annually takes around 40-45,000 tpa of hazardous waste derived nationally (see separate paper on hazardous waste) and also has a large voidspace capacity. The hazardous waste landfill operation and the adjoining non-hazardous landfill site are restricted by planning condition to 2009.

5.124 Subsequent to the primary disposal operations, ancillary waste activities have been permitted that raise waste management up the waste hierarchy. These are located near to the primary sites for disposal, and time limited to coincide with those operations. Activities include: a waste transfer station; a 10,000 tpa green waste composting facility; recycling of inert materials; temporary storage of end of life fridges and freezers (up to 2010); a household waste recycling centre[42] (HRC) for local people to bring their household waste for recycling, composting and disposal; and a temporary 50,000tpa materials recovery facility (MRF).

5.125 Although this WCS is not a site specific document the issue of site restoration at two landfills in the Green Belt will come to the fore in the next few years as planning permissions (under a single owner/operator) will lapse in 2009. To continue operating will require renewal of their respective planning permissions. The permissions relate to landfilling and ancillary operations for non-hazardous waste (biodegradable C&I waste) and hazardous waste (see also Issue W8.). However, both sites are unlikely to be completed by that date. This will potentially result in a large area of Green Belt land being unrestored within the approved timeframe. It is not the role of this WCS to resolve the outcome of any such application, but rather to set for the framework for determination if an application were to come forward.

**How should proposals for waste management facilities on Green Belt designated land be assessed? Please see Questions for Issue W9. on the standard response form.**

[42] HRC's are also sometimes referred to as Civic Amenity Sites (CAS), or colloquially as "the tip".

## W10. Policies for Dealing with other Nationally Designated Areas

5.126 The potential to include policies in the WCS setting out the approach to dealing with proposals for waste development that affect other nationally designated areas was briefly raised in Section 3. This was in relation to currently 'saved' policies in the adopted WLP: Internationally and Nationally Designated Sites for Nature Conservation (Policy 23); Areas of Outstanding Natural Beauty (Policy 26); and Sites of National Archaeological Importance (Policy 28). It is proposed to roll forward the thrust of these into the WCS, though removing reference to the BPEO where necessary. Additionally a policy is required to reflect the provisions of the Water Framework Directive.

### *Nature Conservation*

5.127 The most important sites for biodiversity are those identified through international conventions and European Directives. Planning policy in PPS9 states that since such sites enjoy statutory protection, specific polices in respect of these sites should not be included in local development documents. Consequently Policy 23 of the adopted WLP requires amendment.

5.128 Nationally designated nature conservation sites (Sites of Special Scientific Interest [SSSI] and National Nature Reserves [NNRs]) should be given a high degree of protection under the planning system. PPS9 also requires that development documents reflect, and are consistent with, local biodiversity priorities and objectives. In Gloucestershire we need to take account of Local Biodiversity Action Plans (LBAPs), these include the 'Biodiversity Action Plan for Gloucestershire' and 'The Cotswold Water Park Biodiversity Action Plan'.

5.129 The Structure Plan Third Review Policy MR.5 'Biodiversity & Geodiversity', states that "*Proposals for waste related development will be required to protect and, wherever possible, enhance the biodiversity and geodiversity, including wildlife, habitats and geological or geomorphological features of the County*." In combination with WLP Policy 23 these could be used as the basis for an overarching nature conservation policy:

***Planning permission will not be granted for waste development which would conflict with the conservation, management and enhancement of National Nature Reserves and Sites of Special Scientific Interest unless, in exceptional circumstances, it can be demonstrated that the benefits of the development clearly outweigh the impact that it is likely to have on any specific features of the site, and that the harmful aspects can be adequately mitigated.***

5.130 It should be noted that policies that deal with more locally designated areas, valued habitats and specific operational matters, for example Key Wildlife Sites, Regionally Important Geological/Geomorphological Sites, ancient woodlands, priority biodiversity habitats, networks of habitats, previously developed land, site access, pollution, hydrology and the information required to accompany planning applications etc. will be set out in the Development Control DPD to be prepared alongside the Site Allocation DPD once the WCS has been adopted.

### *Water Environment*

5.131 A policy needs to be set out in the WCS that furthers the objectives of the Water Framework Directive (WFD). This needs to accord with the RSS. Planning bodies and authorities need to think about the implications of proposed development and land use change on water, including beyond their local authority boundary. Future development needs to be planned carefully so that it does not result in further pressure on the water environment and compromise WFD objectives.

5.132 Planning policies should influence the design and location of new development to ensure it does not create adverse pressures on the water environment that could compromise our ability to meet WFD objectives. Policies 33 and 34 of the WLP currently address some of

these issues and will be replaced in due course in a Development Control DPD. However, a new strategic policy could be drafted stating:

***Planning permission will not be granted for waste development that would adversely affect the water environment such that it could compromise the ability to meet the Water Framework Directive objectives of safeguarding, maintaining and where appropriate improving water quality.***

***Landscape***

5.133 The national policy for development in Areas of Outstanding Natural Beauty (AONB) is set out in PPS7 (paragraphs 21-23). This guidance states that major developments should not take place in AONBs, except in exceptional circumstances. Major development proposals are considered to be those that raise issues of national significance. Where such development is proposed it should be subject to the most rigorous examination. Major development proposals should be demonstrated to be in the public interest before being allowed to proceed. PPS7 states that consideration of such applications should include an assessment of:

- the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
- any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

5.134 However, in respect of market 'need', PPS10 states that where proposals are consistent with an up-to-date development plan waste planning authorities should not require applicants for new or enhanced waste management facilities to demonstrate a quantitative or market need for their proposal. For an applicant not to have to demonstrate a market need for proposed development in the AONB it would have to be located on an allocated site. By default as such an allocation would be in the AONB a consideration of it's 'need' would have been undertaken during the Site Allocation DPD preparation process. If the site was not allocated in a DPD then 'need' would have to be demonstrated by the applicant. The appropriateness of identifying sites for waste management facilities in the AONB is matter that relates to Issue W5.

5.135 The AONB policy is proposed to be amended to more closely reflect the requirements of PPS7. One option for how it could read is:

***Proposals for waste development within areas of outstanding natural beauty will only be permitted where:***

- ***There is a lack of alternative sites outside of the AONB to serve that market need; and***
- ***The impact on the special features of the AONB (including the landscape setting and recreational opportunities) can be mitigated.***

***In the case of major development proposed in the AONB a proven national interest needs to be demonstrated. Approval will only be granted in exceptional circumstances following the most rigorous examination.***

***Archaeology***

5.136 The policy for Sites of National Archaeological Importance could be rolled forward from the WLP. It would read:

***Proposals for waste management which would cause damage to or involve significant alteration to nationally important archaeological remains or their settings, whether scheduled or not, will not be permitted.***

**How should we word policies dealing with strategic environmental issues? Please see Questions for Issue W10. on the standard response form.**

### W11. Sustainability Appraisal (SA) and Strategic Environmental Appraisal (SEA)

5.137 It is a statutory requirement for the MWDF, (and this Issues and Options Document as a part of the Framework) 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.

5.138 The process of SA 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 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 which should be read in conjunction with this report. The latest versions of these reports can be viewed and downloaded at the following web address: http://www.gloucestershire.gov.uk/index.cfm?articleid=11577

5.139 A comprehensive SA Report accompanies this Issues and Options Report, presenting information on the effects of the plan. A non-technical summary is available at the front of the SA Report. Comment on the SA Report are invited from the public, and will be taken into consideration in the same way as comments on the Issues and Options Report itself. A further SA Report will accompany the Preferred Option Report and the finalised DPD, which will be submitted, to the Secretary of State for Independent Examination.

**Do you have any comments on the accompanying SEA/SA? Please see Questions for Issue W11. on the standard response form.**

### W12. Other issues?

5.140 Are there any other issues that you wish to raise that have not already been included in this Issues and Options Waste Core Strategy consultation document?

**Are there any other matters that should be raised? Please see Questions for Issue W12. on the standard response form.**

# Appendix A
# Glossary of Terms

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Development Plan** - In Gloucestershire this comprises the Structure Plan, district local plans, Waste Local Plan and Minerals Local Plan.

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

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

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

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

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

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

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

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

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

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

**Greenfield Site** - A site previously unaffected by built development.

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

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

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

**Incineration** - The controlled burning of waste, either to reduce its volume, or its toxicity. Energy recovery from incineration can be achieved by utilising the calorific value of paper, plastic, etc to

produce heat or power. Current flue-gas emission standards are very high. Ash residues still tend to be disposed of to landfill.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**MPG** - Mineral Planning Guidance.

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

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

**Office of the Deputy Prime Minister (ODPM)** - The Government department with responsibility for planning and local government.

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

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

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

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

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

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

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

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

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

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

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

**Recycled Aggregates** - Aggregates produced from recycled construction waste such as crushed concrete, road planning's etc.

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

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

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

**Regional Planning Guidance (RPG)** - Produced by the Government Office for the South West (GOSW) on behalf of the Secretary of State. Until it is replaced by the new Regional Spatial Strategy (RSS) it provides a regional strategy within which Local Plans, Local Development Documents and the Local Transport Plan should be prepared.

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

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

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

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

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

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

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

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

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

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

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

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

**Structure Plan** - A broad land use and transport strategy which establishes the main principles and priorities for future development. Prepared by the County Council as part of the Development Plan.

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

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

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

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

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

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

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

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

**Waste Local Plan** - A statutory land-use plan. Its purpose is set out detailed land-use policies in relation to waste management development in the County.

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

**Waste Minimisation** - Reducing the volume of waste that is produced. This at the top of the Waste Hierarchy.

# Appendix B
# Gloucestershire Structure Plan Policies

**Gloucestershire Structure Plan Second Review**

**Policy WM.1** - **Best Practicable Environmental Option (BPEO), and Development and Operation**

Waste management facilities located within Gloucestershire should operate on the basis that waste will be treated and/or disposed of by employing the best practicable environmental option (BPEO) for management of a particular waste stream.

**Policy WM.2**

Primary* waste management facilities should be located near to major concentrations of waste arisings, principally the Cheltenham /Gloucester urban area, the Forest of Dean and the Stroud/Cirencester areas. Secondary facilities should be appropriately located in other parts of the County to serve the primary facilities. The following considerations will apply:
(a) how proposals contribute towards an integrated waste management system and the provisions of the development plan;
(b) the transportation of waste must use a method that has the least environmental impact, including alternatives to road transport, unless shown to be impracticable or not economically feasible;
(c) the amenity of local communities and access to the countryside is safeguarded and where possible enhanced;
(d) that reclamation and aftercare of the site are to an acceptable standard;
(e) there is no adverse impact on internationally, nationally, regionally and locally important areas of landscape, nature conservation, and archaeological interest; and
(f) there is no adverse impact on important natural resources including agricultural land and the water– based environment.
** A primary waste management facility is a major site such as a centralised landfill or Energy from Waste (EfW) facility, whilst a secondary facility is one which serves a primary site - a waste transfer station, for example.*

**Policy WM.3 - Regional Self-sufficiency**

Development intended to primarily cater for Gloucestershire's waste will be encouraged in the appropriate locations.

**Policy WM.4 - Recycling and Composting**

Provision will be made for facilities associated with the recovery of materials through recycling and composting. The following locational criteria will apply:
(a) facilities should contribute towards an integrated waste management system;
(b) facilities should be in close proximity to major concentrations of waste arisings; and
(c) industrial, redundant and "brownfield" sites or existing waste management sites should be used in preference to virgin land where appropriate.

**Policy WM.5** - **Energy from Waste**

Provision* will be made for energy from waste facilities in or near to the Gloucester/Cheltenham area.
** Provision will be made via land allocations and/or development control appraisal criteria, set out within the Waste Local Plan.*

**Policy WM.6 - Disposal**

Provision will be made for the disposal of Gloucestershire's post–treatment un-recovered waste residues in appropriate locations where necessary.

**Gloucestershire Structure Plan Third Alteration**

**Policy SD.22 BPEO & Development Operation**
*This policy is unchanged from the adopted Structure Plan Second Review (WM.1) – see Chapter 1 – Introduction.*

Waste management facilities located within Gloucestershire should operate on the basis that waste will be treated and/or disposed of by employing the best practicable environmental option (BPEO) for management of a particular waste stream.

**Policy SD.23 Primary Waste Management Facilities**

Provision will be made for a mix of waste management facilities in Gloucestershire, but with reduced reliance on landfill. Primary waste management facilities, particularly which recover value from waste, should be located within or near to the Principal Urban Areas of Gloucester and Cheltenham, where waste arisings are concentrated. Secondary facilities should be located in other parts of the County to serve the primary facilities.

The following locational criteria will apply:
a) industrial, redundant and brownfield sites or existing and previous waste management sites, working and worked out quarries, should be used in preference to greenfield sites;
b) transport links should be adequate and priority should be given to sites which can be served by alternatives to road transport, thus the following hierarchy will apply:
    1. sites close to railways or waste transport wharves;
    2. sites close to major junctions in the road network; and
c) there should be opportunities for the appropriate reclamation and afteruse.

**Policy SD.24 Need for Waste Management Facilities**

Waste management facilities should contribute towards the provision of a sustainable waste management system in Gloucestershire, or subregionally or regionally, subject to the demonstration of the BPEO for that waste stream.
Where waste management proposals are likely to cause seriously harmful environmental effects, the clear establishment of need, which outweighs any adverse environmental impact, should be demonstrated. The establishment of need will take account of additional capacity requirements and the type of facility being proposed in relation to other Development Plan policies.

# Appendix C
# Gloucestershire Waste Local Plan
# Policies Proposed to be Replaced or Rolled Forward into the WCS

***POLICY 1 – BEST PRACTICABLE ENVIRONMENTAL OPTION***

PROPOSALS FOR WASTE DEVELOPMENT WILL BE PERMITTED ONLY WHERE IT IS SHOWN BY BEST PRACTICABLE ENVIRONMENTAL OPTION ANALYSIS TO MAKE A POSITIVE CONTRIBUTION TO AN INTEGRATED AND SUSTAINABLE WASTE MANAGEMENT SYSTEM FOR GLOUCESTERSHIRE.

**POLICY 2 – REGIONAL SELF-SUFFICIENCY**

PROPOSALS FOR WASTE DEVELOPMENT, WHICH ARE LIKELY TO INVOLVE TRANSPORTATION BEYOND THE COUNTY BOUNDARY WILL ONLY BE PERMITTED WHERE THEY ARE NECESSARY TO ACHIEVE REGIONAL SELF-SUFFICIENCY UNLESS THEY COMPRISE THE BPEO FOR THE WASTE STREAM.

**POLICY 3 - PROXIMITY PRINCIPLE**

AS A GENERAL PRINCIPLE WASTE SHOULD BE DEALT WITH AS NEAR AS IS PRACTICABLE TO THE PLACE WHERE IT IS GENERATED. THIS PRINCIPLE IS SUBJECT TO ENVIRONMENTAL, SOCIAL, ECONOMIC AND TRANSPORT CONSIDERATIONS, WHICH ARE APPROPRIATE TO THE WASTE MANAGEMENT FACILITIES AND PROCESSES BEING PROPOSED AND WHICH WOULD CONTRIBUTE TO THE ANALYSIS OF THE BPEO FOR THE FACILITY.

**POLICY 7 - SAFEGUARDING SITES FOR WASTE MANAGEMENT FACILITIES**

EXISTING SITES IN PERMANENT WASTE MANAGEMENT USE (INCLUDING SEWAGE AND WATER TREATMENT WORKS) AND PROPOSED SITES FOR WASTE MANAGEMENT USE WILL BE SAFEGUARDED BY LOCAL PLANNING AUTHORITIES, WHERE THEY MAKE A CONTRIBUTION TO A SUSTAINABLE WASTE MANAGEMENT SYSTEM IN ACCORDANCE WITH BPEO FOR GLOUCESTERSHIRE. THE WASTE PLANNING AUTHORITY WILL NORMALLY OPPOSE PROPOSALS FOR DEVELOPMENT WITHIN OR IN PROXIMITY TO THESE SITES WHERE THE PROPOSED DEVELOPMENT WOULD PREVENT OR PREJUDICE THE USE OF THE SITE FOR AN APPROPRIATE WASTE MANAGEMENT DEVELOPMENT.

**POLICY 16 – SPECIAL WASTE FACILITIES**

FACILITIES FOR THE ADDITIONAL HANDLING, TREATING, PROCESSING OR DISPOSAL OF SPECIAL WASTES WILL BE PERMITTED IF IT CAN BE DEMONSTRATED-

- THAT IT WOULD FORM PART OF A SUSTAINABLE WASTE MANAGEMENT SYSTEM; AND
- THAT IT WOULD MEET THE RELEVANT POLICIES AND CRITERIA OF THE DEVELOPMENT PLAN.

**POLICY 23 - INTERNATIONALLY AND NATIONALLY DESIGNATED SITES FOR NATURE CONSERVATION**

PLANNING PERMISSION WILL NOT BE GRANTED FOR WASTE DEVELOPMENT, WHICH WOULD CONFLICT WITH THE CONSERVATION, MANAGEMENT AND ENHANCEMENT OF THE FOLLOWING DESIGNATED SITES OF INTERNATIONAL AND NATIONAL IMPORTANCE:

INTERNATIONAL:
- RAMSAR SITES
- SPECIAL PROTECTION AREAS (INCLUDING POTENTIAL SITES)
- SPECIAL AREAS OF CONSERVATION (INCLUDING CANDIDATE SITES)

NATIONAL:
- NATIONAL NATURE RESERVES
- SITES OF SPECIAL SCIENTIFIC INTEREST

**POLICY 26 - AREAS OF OUTSTANDING NATURAL BEAUTY**

PROPOSALS FOR WASTE DEVELOPMENT WITHIN AREAS OF OUTSTANDING NATURAL BEAUTY, AND/OR ADVERSELY AFFECTING THE NATURAL BEAUTY OF THEIR LANDSCAPE SETTING, WILL ONLY BE PERMITTED WHERE;

- IT CAN BE DEMONSTRATED TO BE THE BEST PRACTICABLE ENVIRONMENTAL OPTION; AND
- THERE IS A LACK OF ALTERNATIVE SITES; AND
- THERE IS A PROVEN NATIONAL INTEREST; AND
- THE IMPACT ON THE SPECIAL FEATURES OF THE AONB CAN BE MITIGATED.

**POLICY 28 - SITES OF NATIONAL ARCHAEOLOGICAL IMPORTANCE**

PROPOSALS FOR WASTE DEVELOPMENT WHICH WOULD CAUSE DAMAGE TO OR INVOLVE SIGNIFICANT ALTERATION TO NATIONALLY IMPORTANT ARCHAEOLOGICAL REMAINS OR THEIR SETTINGS, WHETHER SCHEDULED OR NOT, WILL NOT BE PERMITTED.

**POLICY 35 – GREEN BELT**

IN THE GREEN BELT, WASTE MANAGEMENT DEVELOPMENT WILL ONLY BE PERMITTED WHERE IT CAN BE DEMONSTRATED TO BE THE BEST PRACTICABLE ENVIRONMENTAL OPTION AND DOES NOT CONFLICT WITH THE PURPOSES OF GREEN BELT DESIGNATION IN THE FOLLOWING INSTANCES:

A - THE CONSTRUCTION OF A WASTE MANAGEMENT FACILITY WILL ONLY BE PERMITTED WHERE IT COMPRISES AN ESSENTIAL FACILITY WHICH IS GENUINELY REQUIRED AND WHOSE FORM, BULK AND GENERAL DESIGN IS IN KEEPING WITH ITS SURROUNDINGS AND WHERE WASTE MANAGEMENT OPERATIONS OF A TEMPORARY NATURE INCLUDE THE LIKELY DURATION OF THE WASTE MANAGEMENT OPERATION.

B - THE RE-USE OF A BUILDING FOR WASTE MANAGEMENT PURPOSES WILL BE PERMITTED PROVIDED:

(I) IT DOES NOT HAVE A MATERIALLY GREATER IMPACT THAN THE PRESENT USE ON THE OPENNESS OF THE GREEN BELT AND THE PURPOSES OF INCLUDING LAND IN IT;

(II) THE BUILDING IS OF PERMANENT AND SUBSTANTIAL CONSTRUCTION AND IS CAPABLE OF CONVERSION WITHOUT MAJOR OR COMPLETE RECONSTRUCTION; AND

(III) THE FORM, BULK AND GENERAL DESIGN OF THE BUILDING IS IN KEEPING WITH ITS SURROUNDINGS.

**POLICY 36 - WASTE MINIMISATION**

PROPOSALS FOR DEVELOPMENT REQUIRING PLANNING PERMISSION SHALL INCLUDE A SCHEME FOR SUSTAINABLE MANAGEMENT OF THE WASTE GENERATED BY THE DEVELOPMENT DURING CONSTRUCTION AND DURING SUBSEQUENT OCCUPATION. THE SCHEME SHALL INCLUDE MEASURES TO:

I. MINIMISE, RE-USE AND RECYCLE WASTE; AND
II. MINIMISE THE USE OF RAW MATERIALS; AND
III. MINIMISE THE POLLUTION POTENTIAL OF UNAVOIDABLE WASTE; AND
IV. DISPOSE OF UNAVOIDABLE WASTE IN AN ENVIRONMENTALLY ACCEPTABLE MANNER;

INITIATIVES TO REDUCE WASTE GENERATION WILL BE ENCOURAGED THROUGHOUT THE COUNTY.

# Appendix D
# Waste Local Plan Key Objectives

**Adopted Waste Local Plan Key Objectives**

1. To reduce the amount of waste produced in Gloucestershire;

2. To make the best use of the waste produced within Gloucestershire through increased re-use and recovery;

3. To encourage sensitive waste management practices within Gloucestershire in order to preserve or enhance the overall quality of the environment and avoid risks to human health.

4. To achieve a more sustainable waste management system by using the Best Practicable Environmental Option methodology in decision making, and taking into account the guiding principles of the Waste Hierarchy, Proximity Principle and Regional Self Sufficiency (see next section for a guide to these principles);

5. To assist in creating economic prosperity and employment for Gloucestershire by encouraging competitiveness, meeting the needs of business, and in considering what new waste management enterprises will be required;

6. To ensure that waste management issues are properly considered and opportunities are incorporated into new development proposals.

7. To minimise adverse environmental impacts resulting from the handling, processing, transport and disposal of waste.

8. To protect public amenity from the adverse impact of waste management and to have regard to the need to protect areas of designated landscape and nature conservation value from inappropriate development.

9. To make the most efficient use of land by re-using appropriate brownfield land, industrial land, quarry voids and existing waste management sites in preference to undesignated green field sites;

10. To minimise the environmental impacts of transporting waste by applying the proximity principle, and encouraging more sustainable means of transport for the re-use, recovery and disposal of waste;

11. To provide clear guidance on the locational criteria that must be met before planning permission can be granted, and set out policies on planning conditions, planning obligations, monitoring and enforcement; and

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

## Appendix E
## Standard Questions for commenting on the Issues and Options

Please note that these questions are reproduced here for reader's convenience. A standard form is available that can be completed on-line or in paper form. It is available at council offices, libraries or by contacting the Minerals & Waste Policy Team on 01452 425704

| Question Number | Issues & Options Questions |
|---|---|
| 1.1 | Do you think that we need a Vision for the WCS?<br>a. Yes;<br>b. No;<br>c. Don't know. |
| 1.2 | What would be your Vision for sustainable waste management in Gloucestershire (if different from the proposed interim Vision)? |
| 1.3 | Do you think that the objectives for the WCS will deliver sustainable waste management for Gloucestershire?<br>a. Yes;<br>b. No;<br>c. Don't know. |
| 1.4 | If you answered No to Q1.3 above, how would you alter the current objectives?<br><br>Please use the space below to list any other issues would you like to see added/removed from the existing objectives? If possible please include an existing objective number. |
| | |
| 2.1 | What do you consider to be an appropriate timeframe for the WCS to work towards?<br>a. 2018<br>b. 2020<br>c. 2026<br>d. Other, please give your reasons. |
| 2.2 | As an alternative option, do you think that the WCS should look in detail to 2018, and then more generally to 2026?<br>a. Yes;<br>b. No;<br>c. Don't know. |
| | |
| 3.1 | Is seeking to minimise waste an appropriate objective for the WCS?<br>a. Yes;<br>b. No;<br>c. Don't know. |
| 3.2 | What format do you think any waste minimisation policy should take?<br><br>a. Rely on the saved WLP policy 36 and roll it forward broadly in its current state into the WCS; or<br>b. Revise WLP policy 36 to take account of new issues, such as threshold sizes of planning application to determine whether applicants need to submit a waste minimisation statement; or<br>c. A combination of a & b above; or<br>d. Another format? (Please state) |

| | |
|---|---|
| 3.3 | Should developers of large-scale new projects (for example houses, shops, offices etc) be responsible for the waste they generate?<br>a. Yes; (go to question 3.4)<br>b. No;<br>c. Don't know. |
| 3.4 | If you answered YES to Q3.3 above then how do you think developers should contribute to the management of the waste generated by their projects?<br>a. Allocating part of the site for suitable waste facilities;<br>b. Making monetary contributions towards the development of waste management infrastructure elsewhere;<br>c. A combination of both of the above;<br>d. Other (Please specify). |
| 3.5 | Do you consider that waste, which cannot be avoided, should be composted or recycled in the first instance?<br>a. Yes;<br>b. No (please give your reasoning);<br>c. Don't know. |
| 3.6 | Should the WCS include a specific policy to encourage the recovery of value from waste that cannot be practically composted or recycled?<br>a. Yes;<br>b. No;<br>c. Don't know. |
| 3.7 | If you answered yes to question 3.6 above please use this space to include a wording or list the key points you would like to see in such a policy |
| 3.8 | How do you consider the issue of 'need' for waste management facilities should be addressed in the WCS, if at all? |
| 3.9 | Do you have any other ideas how the Waste Hierarchy could be implemented? |
| | |
| 4.1 | Do you think that the WCS should broadly roll forward the same overarching strategy as that adopted in the WLP?<br>a. Yes;<br>b. No (please can you provide your reasons);<br>c. Don't know. |
| 4.2 | Do you think more sites for waste management facilities should be allocated than may be required to allow greater flexibility/choice?<br>a. Yes;<br>b. No;<br>c. Don't know. |
| 4.3 | Do you think that it is appropriate to not allocate sites for recycling/composting, and to determine these applications on a case-by-case basis?<br>a. Yes;<br>b. No;<br>c. Don't know. |
| 4.5 | Should Area Action Plans be prepared for parts of the County likely to be subject to significant change due to waste management operations?<br>a. Yes;<br>b. No;<br>c. Don't know. |
| 4.6 | Do you think the WCS should differentiate between local and strategic sites?<br>a. Yes; (go to question 4.7)<br>b. No;<br>c. Don't know. |

| | |
|---|---|
| 4.7 | If you answered YES to Q4.6 above then do you think the current figure of 50,000 tonnes annual throughput is an appropriate threshold for 'strategic' sites?<br>a. Yes;<br>b. No. The threshold figure should be _____;<br>c. There should be different thresholds depending on the types of waste being handled;<br>d. No threshold should be used at all. |
| 4.8 | There are a number of ways by which possible sites for waste management facilities might be identified.<br><br>The top row of the table below presents a number of these, while the first column lists different types of facilities. For each type of facility, please indicate which method of site identification you think is most appropriate by placing a tick in the relevant column. |

**Table 4.8 Facility Identification Matrix**

| Method of site identification ⇨ / Facility Type ⇩ | Identify only smaller sites in a DPD | Identify only strategic sites in a DPD | Identify all preferred sites in a DPD | Only identify broad areas of search in a DPD | Identify no sites in a DPD and rely on a criteria based policy |
|---|---|---|---|---|---|
| **Composting Green Waste** | | | | | |
| **Composting Kitchen Waste (mixed organic content)** | | | | | |
| **Biodegradable Re-use, Recycling, Transfer/bulking-up** | | | | | |
| **Inert Re-use, Recycling, Transfer/bulking-up** | | | | | |
| **Recovery/Treatment facility (e.g. MBT, EfW)** | | | | | |
| **Disposal Sites (Landfill)** | | | | | |
| **'Other' facility type, please specify:** _____ | | | | | |

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

| Table 5.1 - Town or Rural Locations? | | | | |
|---|---|---|---|---|
| **Facility Type** | **Town** | **Edge of Towns** | **Rural** | **Not Sure** |
| **Composting Green Waste** | | | | |
| **Composting Kitchen Waste** | | | | |
| **Biodegradable Re-use, Recycling, Transfer/bulking** | | | | |
| **Inert Re-use, Recycling, Transfer/bulking-up** | | | | |
| **Recovery/Treatment facility (e.g. MBT, EfW)** | | | | |
| **Disposal Sites (Landfill)** | | | | |
| **'Other' facility type, please specify** _____ | | | | |

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

| Table 5.2 - Centralised or Dispersed Facilities? | | | | |
|---|---|---|---|---|
| **Facility Type** | **Centralised Facilities (in or near Gloucester Cheltenham)** | **Dispersed facilities (local facilities in each District)** | **Combination of centralised and dispersed** | **Not Sure** |
| **Composting Green Waste** | | | | |
| **Composting Kitchen Waste** | | | | |
| **Biodegradable Re-use, Recycling, Transfer/bulking** | | | | |
| **Inert Re-use, Recycling, Transfer/bulking-up** | | | | |
| **Recovery/Treatment facility (e.g. MBT, EfW)** | | | | |
| **Disposal Sites (Landfill)** | | | | |
| **'Other' facility type, please specify** _____ | | | | |

| | |
|---|---|
| 5.3 | Should the WCS identify sites for more landfill capacity towards the end of the WCS period (see issue 2) by:<br>a. Planning for full expected capacity;<br>b. Making limited provision;<br>c. Not making any specific provision. |
| 5.4 | If additional landfill void space has to be found, what criteria should be used for finding suitable sites for landfilling residual waste? |
| 5.5 | The matters set out in Table 5.5 are all very important criteria in finding suitable sites for waste management activities of all types.<br><br>Please rank the ones you feel are most important from 1 to 5 (where 1 is the most important) but only using each ranking number once. |

| Table 5.5 – Ranking of Locational Issues | |
|---|---|
| | **Rank** |
| **The suitability of local roads to handle traffic and the site access;** | ☐ |
| **Protecting green-field land;** | ☐ |
| **Locating new waste facilities with complementary existing activities;** | ☐ |
| **Using sustainable modes of transport (e.g. by rail or water rather than by road);** | ☐ |
| **The impact on neighbouring land-uses (e.g. nearby businesses and residents);** | ☐ |
| **Safeguarding nature conservation interests (e.g. impact on wildlife, biodiversity etc.);** | ☐ |
| **Protecting the historic environment and built heritage (e.g. listed buildings, conservation areas);** | ☐ |
| **Locating facilities near to the source of waste arising** | ☐ |
| **The visual impact of the facility;** | ☐ |
| **Preventing environmental pollution (i.e. protection of water resources, noise, dust, air emissions, litter, vermin, birds, odours, vibration & land instability).** | ☐ |

| | |
|---|---|
| 6.1 | How should the waste processing requirements set out in the JMWMS be translated into site allocations?<br>a. By allocating specific sites;<br>b. By using criteria based policy (particularly for waste management options at the top of the waste hierarchy);<br>c. Other (please state);<br>d. Don't know. |
| | |
| 7.1 | What criteria would you use to determine 'cumulative impact' of a waste management facility on a host community? |
| 7.2 | How should existing waste management facilities be safeguarded from encroachment by potentially incompatible land-uses?<br>a. By using the approach proposed in the safeguarding policy;<br>b. By some other way, (please specify);<br>c. Don't know. |
| | |
| 8.1 | Is seeking to minimise hazardous waste at source an appropriate objective for the WCS?<br>a. Yes;<br>b. No;<br>c. Don't know. |
| 8.2 | Is it appropriate to safeguard existing hazardous waste management facilities provided that they are environmentally acceptable?<br>a. Yes; (go to question 8.3)<br>b. No; (if not please state your reasons why)<br>c. Don't know. |
| 8.3 | If you answered yes to question 8.2, what criteria should be used to determine the acceptability of a facility for dealing with hazardous waste?<br><br>The table below shows a list of criteria that need to be considered for both existing and proposed hazardous waste facilities. Please rank the criteria you feel are most important, from 1 to 5 (where 1 is the most important) but only using each ranking number once. |

| Table 8.3 – Determining the 'Environmental Acceptability' of Hazardous Waste Facilities | Rank |
|---|---|
| The location of the facility in relation to local, regional or national hazardous waste arisings | ☐ |
| The suitability of local roads to handle traffic and the site access; | ☐ |
| The availability of sustainable modes of transport nearby (e.g. rail or water rather than road); | ☐ |
| The impact on neighbouring land-uses (e.g. nearby businesses and residents); | ☐ |
| The impact on wildlife, biodiversity etc.; | ☐ |
| The impact of the facility on listed buildings, conservation areas and ancient monuments; | ☐ |
| The compatibility of the facility with neighbouring land-uses | ☐ |
| The visual impact of the facility; | ☐ |
| The need for the facility; | ☐ |
| Locating new hazardous waste facilities with complementary existing activities; | ☐ |
| The pollution control record of the facility. | ☐ |
| The effect of not having the facility on the environment (e.g. derelict land issues, waste traveling to different facilities); | ☐ |

| | |
|---|---|
| 8.4 | What other options do you consider there are for managing hazardous waste? |
| | |
| 9.1 | What factors should be used in determining the appropriateness of waste development in the Green Belt?<br><br>Please rank the ones you feel are most important from 1 to 5 (where 1 is the most important) but only using each ranking number once. |

| Table 9.1 – Suitability of locating Waste Management Facilities within the Greenbelt? | Rank |
|---|---|
| Proximity to arisings and reducing the distance waste has to travel; | ☐ |
| Suitability of local roads to handle traffic and the site access; | ☐ |
| The planning history of the site; | ☐ |
| Co-locating complementary or ancillary activities with existing activities; | ☐ |
| Good facility design; | ☐ |
| Re-using previously developed land or redundant agricultural buildings; | ☐ |
| Economic and employment benefits. | ☐ |
| Maintaining the openness of the Green Belt | ☐ |
| Preventing the merging of nearby town areas | ☐ |
| Safeguarding the setting of historic towns | ☐ |

| | |
|---|---|
| 9.2 | Do you consider that redefining the Green Belt boundary to take into account and provide more potential for waste management facilities on existing sites/brown field land is appropriate?<br>a. Yes;<br>b. No;<br>c. Don't know. |
| | |
| 10.1 | Do you agree with the suggested wording for the policies on:<br>1. Nature conservation<br>2. Water environment<br>3. Landscape<br>4. Archaeology |
| 10.2 | If you answered "No" to any of the options in Question 10.1 please use this space for any additional comments you may have on the policies. |
| 10.3 | Are there any other designations that you think should be included as being strategic environmental assets? |
| | |

| | |
|---|---|
| 11.1 | In line with government guidance this Issues and Options paper has been subject to a sustainability appraisal that examines its likely social, environmental and economic impacts.<br><br>Please use this space for any comments you wish to make on the accompanying SA Report (available on-line). |
| | |
| 12.1 | Are there any other issues/options that this paper has not raised that you consider should be addressed? Or please use this space for any general comments you wish to make about sustainable waste management in the County. |

# Appendix F
# List of Acronyms

| | |
|---|---|
| AAP | Action Area Plan |
| AMR | Annual Monitoring Report |
| AONB | Area of Outstanding Natural Beauty |
| APC | Air Pollution Control Residue |
| BMW | Biodegradable Municipal Waste |
| C&D | Construction and demolition waste |
| C&I | Commercial and industrial waste |
| CABE | Commission for Architecture and the Built Environment |
| CBI | Confederation of British Industry |
| CPA | County Planning Authority |
| CPRE | Council for the Protection of Rural England |
| CS | Community Strategy |
| CVS | Local Council for Voluntary Services |
| DC | Development Control |
| DEFRA | Department of Environment, Food and Rural Affairs |
| DETR | Department of the Environment, transport and the Regions |
| DoE | Department of Environment |
| DPD | Development Plan Document |
| EA | Environment Agency |
| GCC | Gloucestershire County Council |
| GDPO | General Development Procedure Order |
| HSE | Health and Safety Executive |
| IPPC | Integrated Planning and Pollution Control |
| LDD | Local Development Document |
| LDF | Local Development Framework |
| LDS | Local Development Scheme |
| LPA | Local Planning Authority |
| LSP | Local Strategic Partnership |
| LTP | Local Transport Plan |
| LTP2 | Local Transport Plan 2 |
| M&W | Minerals and Waste |
| M&WDF | Minerals and Waste Development Framework |
| M&WDPD | Minerals and Waste Development Plan Document |
| M&WDS | Minerals and Waste Development Scheme |
| M&WPA | Minerals and Waste Planning Authority |
| MLP | Minerals Local Plan |
| MPG | Minerals Planning Guidance Note |
| MPS | Minerals Planning Statement |

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| MSW | Municipal Solid Waste |
| MWMS | Municipal Waste Management Strategy |
| ODPM | Office of the Deputy Prime Minister |
| PPC | Pollution Prevention and Control |
| PPG | Planning Policy Guidance Note |
| PPS | Planning Policy Statement |
| RAWP | Regional Aggregates Working Party |
| RPB | Regional Planning Body |
| RSS | Regional Spatial Strategy |
| RTAB | Regional Technical Advisory Body |
| RWMS | Regional Waste Management Strategy |
| SA | Sustainability Appraisal |
| SAC | Special Area of Conservation |
| SAM | Scheduled Ancient Monument |
| SCI | Statement of Community Involvement |
| SEA | Strategic Environmental Appraisal |
| SMR | Sites and Monuments Record |
| SoS | Secretary of State |
| SPA | Special Protection Area |
| SPD | Supplementary Planning Document |
| SPG | Supplementary Planning Guidance |
| SSSI | Site of Special Scientific Interest |
| WCA | Waste Collection Authority |
| WCS | Waste Core Strategy |
| WDA | Waste Disposal Authority |
| WFD | Water Framework Directive |
| WLP | Waste Local Plan |
| WMS | Waste Minimisation Statement |
| WMU | Waste Management Unit |
| WPA | Waste Planning Authority |

# Waste Core Strategy
# Issues & Options
# Part B

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