Gloucestershire Waste Core Strategy (WCS)
Site Options Consultation (2009)
Response Schedule

Stakeholder Number	Name		Organisation	Schedule Page
276	Abbott	K		1
277	Abbott	I		2
256	Adams	N and D A		3
304	Adamson	Christine		4
336	Allen	P		8
215	Andrewartha	Dennis	County Councillor	10
397	Anelay	Philip	North Somerset Council	13
449	Arora	Shona	Gloucestershire NHS	14
393	Ashcroft	Andrew		16
295	Ayers	Christopher		20
150	Bailey	Juliet		24
137	Baker	D		25
319	Baker	P		26
102	Baldwin	Jamie		27
325	Baldwin	Jacqueline		28
391	Baldwin	Jamie		31
270	Bamford	Mr and Mrs		34
348	Barnett	Joanne		36
235	Bartlam	Fiona	Rifina	38
255	Bate	S		39
424	Bates	Chris		40
288	Belcher	Gwen		43
157	Bell	E		44
326	Bellamy	Michael		45
30	Berry	R and I		48
133	Berry	David	The Coal Authority	50
340	Berry	Glenda		51
178	Besien	Tim		54
412	Bingham	Michael		56
231	Binnie	Lucy	Smiths Gloucester Ltd	60
126	Bircher	Charles		63
99	Blackburn	Anthony	GCC Councillor	67
367	Blake	R		71
106	Booth	Philip		72

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129	Bosomworth	James		73
89	Boughton	William		75
172	Bradford	Ken		76
330	Bradford	Ken		80
194	Brookes	Michael		83
35	Brown	P		86
341	Brown	J C		87
43	Brushwood	Keith		89
175	Bufton	Ian		90
407	Bulpin	Alan	Waste Recycling Group Ltd.	91
14	Bye	-		92
15	Bye	-		93
169	Bye	Mr and Mrs		94
114	Calder	Claire		95
284	Cameron	Alistair		96
7	Card	Claire		101
39	Card	Nigel		102
41	Carter	Tim	Teddington & Alstone Parish Council	103
224	Casemore	Martin		105
447	Chapman	Neil	Highways Agency	109
149	Clare	Ruth	Environment Agency	116
16	Clarke	I		123
92	Clarke	Pauline	Tewkesbury Town Council	124
280	Clay	J	Agricultural Supplies Co (Fairford) Ltd	128
9	Clinton	Terry		130
80	Cockcroft	Dave		131
243	Codwin	R C		133
409	Colbeck	Trevor		134
338	Collier	Mr and Mrs		137
220	Cook	L W		139
440	Cook	Humphrey	Humphrey Cook Associates	140
78	Cooke	Mike		145
207	Cooke	Martin		146
1834	Cooper	Jacky	G and M Motors (Glos) Ltd	150

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205	Cope	Julian		151
63	Cottam	Beryl		152
3	Coxon	John A		153
180	Coxon	John		154
49	Craven	A		157
56	Craven	Richard		159
64	Craven	Anne		161
147	Creswick	Sue	Stroud Town Council	163
272	Critchley	J K		166
316	Crix	Martin	MLAGB - The Muzzle Loaders'' Association of Great Britain	167
33	Croft	David and Ashley		168
46	Cullimore	Roger	Moreton C Cullimore (Gravels) Ltd	169
387	Dance	Gregory		170
10	Darwent	John		171
148	Davidson	Sally		173
83	Davies	Chris		174
251	Davies	Mair		178
79	Daws	Kevin		182
452	Dhanda MP	Parmjit		183
179	Dicks	Alan		185
453	Dodd	Simon	European Metal Recycling Ltd.	188
36	Dodson	Peter G		190
107	Doubleday	Marguerite		191
121	Dowdswell	Hilary	Cainscross Parish Council	192
185	Drew	David		196
240	Drinkwater	W		200
298	Driver	M		201
200	Duncan	Robert		202
446	Duncliffe	Paul	P.E. Duncliffe Limited	206
87	Eddy	Dennis and G		209
342	Edis-Bates	Peter		210
213	Edwards	Bill	Environmental Waste Controls Plc	214
226	Ellis	Rupert		217

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344	Eperjesi	Steven		218
396	Epton	Mark	Sustainable Stonehouse	222
154	Farmer	Barbara	SWARD	224
444	Farrow	Janet	Newtown Area Community and Residents''s Association	229
109	Fleming	Sue		231
112	Fletcher	Susan		232
122	Fletcher	Helen		235
286	Fletcher	R		238
356	Fletcher	Christine		239
165	Flory	Nigel		242
166	Flory	Louise		243
317	Foale	Ashely		244
253	Ford	S		246
24	Francis	Anouska	Tewkesbury Borough Council	247
32	Frith	Colin		248
22	Fry	Stuart	Brookthorpe with Whaddon Parish Council	249
380	Gaffney	Rob		250
383	Gant	Bernard		253
174	Gardener	Jacqueline		254
27	Geary	Richard	Cheltenham Borough Council	256
44	Gee	Claire		258
221	Gerry	Rita		260
168	Gibbons	Nigel	Forest of Dean District Council	264
164	Gibson-Wain	Dee		266
363	Gladstone	Caroline		267
250	Glass	Kevin		270
265	Glastonbury	Terry	County Councillors	273
108	Gobey	Francis		276
362	Gobey	Francis		277
430	Goddard	janet	Sunhull Action Group	280
426	Godsell	Jane		282
77	Godwin	J		286
332	Goodhall	David		287
51	Goolden	John		290

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346	Gough	Peter	Longford Parish Council	291
246	Graham	Richard		295
266	Grant	Lewis	Urbaser Ltd	299
364	Graves	Richard		305
88	Green	John		309
302	Greening	Julie	Newtown Area Community and Residents'' Association	310
5	Gregory	R J		311
293	Gribble	M	Eastington Parish Council	312
422	Gribble	Stephen		313
93	Griffiths	Michael		316
162	Griffiths	G		320
313	Griffiths	Michael		323
65	Griffths	Anne		324
419	Grinnell	Peter		327
125	Haigh	Kate		328
182	Haines	Stuart		331
378	Hale	John	Wellington Park Properties Ltd	334
333	Haliday	-	Village Farm	335
84	Hamilton	Gervase	Woodchester Parish Council	337
206	Hamilton	Gervase		342
389	Hancock	Tom	Campaign to Protect Rural England	345
405	Handley	G A		346
192	Hanman	Sue	Cam Parish Council	347
435	Harber	A R		349
321	Harmer	Chris		350
19	Harris	Peter		355
50	Harris	Rob		357
181	Harris	Rob		359
189	Harris	Jackie		363
334	Harris	Graham		366
354	Harris	Mike		368
381	Harris	David		369
67	Harte	Roisin	Gloucestershire VCS	370
136	Harte	Roisin		372

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104	Hartley	Gerald		373
352	Hartley	Ian		374
345	Hartsoe	Ania		376
188	Harvie	Eva		379
307	Hastings	G		383
290	Hatton	Irene		385
301	Hayes	Terence		388
161	Hayward	Michael		392
163	Hayward	Jean		393
300	Hazel	Margaret		394
271	Heath	D		395
196	Hedderman	Michael		396
173	Heenan	Michael		400
414	Heenan	M		403
127	Hennell	Jane	British Waterways	404
155	Highton	Margaret		405
223	Hill	Rachel		406
103	Hillary	Elizabeth		409
139	Hillier-Richardson	Sue	Tewkesbury Borough Councillor	410
53	Hilton	Jeremy	Gloucestershire County Councillor	414
143	Hodgkinson	Paul	Cotswold District Councillor	416
303	Holder	Belinda	Bishops Cleeve Parish Council	417
291	Holmes	D		419
328	Holmes	Diane		423
191	Hopes	Tim		427
370	Hopkins	Julian		431
455	Horwood MP	Martin		432
287	Howard	Lucy		433
456	Howard	David	Oxenton Parish Meeting	434
323	Howell	EJ and PA		440
366	Hubert	John		441
1837	Hunter	David	Wales and West Utilities	442
281	Ireland	L	Frampton On Severn Parish Council	443
237	Jackson	Beverley		446

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451	Jackson	Zoe	Cold Aston Parish Council	448
110	James	Matt		452
158	James	Chris		453
349	James	Mark		454
372	Janota	Sue	South East England Partnership Board	455
123	Jeakins	Alec		456
72	Jenning	S M		460
404	Jennings	Ray		461
274	Johnson	R J		464
124	Jones	Ceri		466
322	Jones	Adrian	West Glos Green Party	470
392	Jones	Michelle		475
327	Kaye	Charles		478
199	Kearns	Peter		482
423	Kennedy	Susan		483
267	Kitchener	Lynsey		485
18	Knight	T P		487
252	Koncher	Dave		488
415	L	Connor		490
66	Lacey	Richard	Stonehouse Town Council	491
310	Lane	Helen		492
410	Langrock	Eva		496
204	Larmouth	Catherine		501
242	Lavell	Cherry		507
132	Lawrence	Alasdair	Complete Circle	508
375	Lawro	Fiona		512
214	Leaney	A	Dursley Town Council	516
113	Leddington	Vicki	Northway Area Residents and Homeowners Association	520
229	Lee	David		524
230	Lee	Jill		525
398	Legge	Tim		526
376	Lewis	Hazel		527
377	Lewis	John		530
369	Lintott	R		532

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37	Llewellyn	Christopher		533
365	Lloyd	Richard	CPRE Gloucestershire Branch	536
12	Lock and White	Alistair and Penny		541
141	Lord	D	Whitminster Parish Council	543
225	Love	Brian		548
151	Lozinska	Wanda		550
282	Luckett	D J		552
1	Lumsdon	M D		555
306	Lunnon	Sarah	County Councillor	557
289	MacTiernan	Elaine	Northway Area Residents and Homeowners Association	560
245	Mackenzie	Ian	Innsworth Parish Council	564
408	Maguire	Kirsty	Robert Hitchins Ltd.	565
318	Maisey	Margaret		567
283	Manley	Fran		568
11	Mansfield	Veronica L		572
31	Mansfield	Gordon W		573
159	Manzi-fe	David		574
382	Marland	David		575
299	Marsden	J		576
312	Marshall	Ian		577
374	Mason	David		579
357	Massey	Patricia Ann		580
359	Massey	Robert		583
433	Massey	R P		587
91	McCaskie	Lucy		588
385	McCombe	Tim	Government Office for the South West (GOSW)	589
457	McGough	Chris	Warner Estate Holdings Plc	591
324	McGrory	E J	Hardwicke Parish Council	592
361	McGrory	E J	Shurdington Parish Council	595
52	McHale	Stephen	Gloucestershire County Labour Group	597
153	McKenzie	Fiona	Gloucestershire County Councillor	599
195	Meade	Dionne		600
190	Melling	Louise		603

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21	Merkel	Chris		606
197	Metcalfe	Martin		607
61	Mills	Keith		611
257	Mills	Sylvia		612
187	Mole	David		613
308	Monroe	Alexia	Bourton On The Hill Parish Council	616
68	Montague	Be		618
69	Montague	George		619
128	Montague	Andrew		620
131	Montague	Tim		621
353	Moore	Susie	Chedworth Parish Council	622
273	Morgan	G C		625
329	Morris	Hugh		627
343	Morris	Valerie	Woodmancote Parish Council	631
417	Morris	Hazel		633
116	Mountifield	David and Margaret		634
62	Mozol	Anna		638
285	Nash	Mr and Mrs		639
20	Neale	J A		640
86	Newman	T		641
2	Nicholson	John R	Standish Parish Council	643
13	Nicholson	John R	Nympsfield Parish Council	645
442	Nicholson	John	Didmarton Parish Council	646
399	Noakes	Lise	Gloucester City Council Councillor	647
402	Noakes	Lise		648
416	Not supplied	Not supplied		650
432	Not supplied	Not supplied		651
279	Nott	Darren		652
262	O'Dowd	Marion		655
264	O'Dowd	Beryl V		659
294	O'Dowd	Michael		663
23	Oakey	Kathryn	Uckington Parish Council	667
222	Oakley	Andrew		670

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28	Odonez	Carlos		672
454	Oldershaw	C F	Gloucester Heritage Urban Regeneration Company Ltd	675
337	Olpin	Meg		676
309	Owen	David	Gloucestershire Geology Trust	677
218	Page	G		680
94	Parsons	Josephine		683
135	Parsons	Gary	Sport England	685
260	Partridge	B		686
236	Pavey	Mark		687
315	Peacey	John		688
420	Pehl	Hermann		689
70	Perkins	Tim	Viridor	690
38	Perry	A		695
450	Pickering	Simon	Gloucestershire Environmental Partnership	696
339	Plested	Keith		698
25	Potts	Nigel		701
90	Potts	Jennifer		704
311	Powell	Kay		707
1836	Pratt	D	Jackies Coaches	710
211	Prince	Christine	Chalford Parish Council	711
441	Pritchard	Lisa	Waste Disposal Authority (WDA)	715
47	Purchase	David		719
217	Quaile	Martin	County Councillor	721
401	Quinn	Bernard		724
244	Quinton	Tim	Natural England	727
278	Radway	T	Tacr Consultancy	728
42	Rank-Broadley	Ian		730
48	Rank-Broadley	Hazel		732
198	Rank-Broadley	Hazel		734
254	Rawlins	M J		735
427	Ray	Diana		736
448	Ray	Diana	Cold Aston Parish Council	737
403	Read	Simon		739
26	Reeves	C		742

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202	Reid	Cathy	Stoke Orchard Parish Council	744
292	Rhodes	Jeff	Biffa Waste Services	748
373	Rhodes	Paul		752
263	Richmond	Peter		753
297	Richmond	Lynn		757
227	Rideout	Julian		760
258	Robb	M		761
259	Robb	Charles		763
228	Robbins	David		764
437	Robbins	Nicola		765
438	Robbins	Daniel		766
386	Roberts	Elizabeth	Kings Stanley Parish Council	767
445	Robertson MP	Laurence		768
71	Rogers	A G		770
239	Rooney	Teresa		771
232	Rudland	Martin		773
347	Rudman	Jennifer		777
170	Ryan	Mike	National Grid	780
384	Sadler	Ben		782
395	Sadler	Carl		783
418	Sanders	Robert		784
96	Saunders	Philip	West Dean Parish Council	786
97	Saunders	Philip		789
210	Savage	Paul		790
305	Savage	Paul		793
428	Savin	Anna		798
335	Searle	David		802
57	Seljimi	Arlinda		806
130	Shaftoe	Fred and Carol		807
275	Sharpe	Stephen		808
238	Shenoi	Venkatesh		809
54	Sheridan	Paul		812
105	Sheridan	Clare		813
146	Sheridan	Clare	GlosVAIN	814

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29	Shirley	Julie		817
134	Shirley	Diana	GlosAIN	819
201	Skinner	Frank		821
314	Slatter	A R		824
120	Smith	Andy		825
249	Smith	Katie	Elmbridge Neighbourhood Partnership	827
406	Smith	Roger		829
59	Snipe	Roger		831
425	Sobey	Jo		832
390	Spiller	Brett	New Earth Solutions Group Ltd	836
248	Sprason	Sally		839
60	Stansfield	Ben	Cory Environmental	841
436	Stegg	I		850
431	Stephens	O		852
177	Steven	Cole		854
421	Stevens	Faith		856
118	Stewart	Mary Clare		857
186	Strauss	Rachelle		862
95	Stretton	John		866
156	Stuart-Grumbar	Jocelyn		870
443	Tait	Barbara	Stroud District Council	871
368	Tapp	J E		876
142	Taylor	Jessica	Leonard Stanley Parish Council	877
233	Taylor	Louise		878
193	Theedam	Duke	Wheatpieces Parish Council	881
144	Thomas	Simon		884
247	Thompson	Russell		886
55	Thorpe	Michael	Gloucester City Council	887
234	Tomkins	Rebecca		892
115	Torr	John		895
360	Totz	Henning	South West Councils	896
400	Totz	Henning	South West Councils	897
81	Towell	A		898
82	Towell	S		899

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411	Towell	Suzanne		900
388	Tranter	K		901
167	Treen	W		902
331	Trelfa	R		904
358	Trower	Anne		907
296	Tuck	Jane		908
145	Tuffnel	Mark	North Cerney Parish Council	910
140	Tufnell	Mark		911
429	Turnmonkey	Everard		912
117	Turrall	Andrew		915
434	Tyack	M		920
350	Valentine	Donna		921
413	Varte	Rinengi		922
183	Viall	Sarah		926
75	Virgo	L G		929
241	Virgo	V		931
76	Wager	R		932
74	Walker	Roma		934
269	Walker	A R		935
111	Wallis	Katy	Grundon Waste Management	936
371	Waterson	Elaine		937
320	Watson	Sue	Lydney Town Council	938
439	Watson	Alan	Gloucestershire Friends of the Earth	940
219	Watt	Malcolm	Cotswold Aonb Partnership	945
208	Weaver	S	Moreton Valence Parish Meeting	948
171	Webster	Nick and Gina		952
119	West-Wiggins	Michelle		953
351	Whelan	Kieran		957
355	Whelan	Gerald		959
17	White	Barrie		963
101	Whiteside	Martin	Stroud District Councillor	964
209	Wilce	-	Parish Clerk Cricklade Town Council	965
4	Wilcox	C M		966
152	Wilkinson	Jane		968

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212	Willett	T L	Winchcombe Town Council	969
8	Willey	E J		972
73	Willey	E M		973
40	Williams	M		974
58	Williams	Brett		975
160	Williams	Angela		976
203	Williams	Angela		978
394	Williams	Mike		982
45	Wilson	C		983
34	Witts	Dave	Severn & Avon Valley Combined Flood Group	984
98	Witts	Dave	Severn & Avon Valley Combined Flood Group	986
176	Wood	Barry		994
184	Woodward	Christine		996
138	Woolridge	Brett		1000
268	Wormald	Paul	MVV	1001
100	Wyndham	Alice		1004
85	Yagud	Miriam		1005
379	Yagud	Miriam		1007
6	Yates	Mel		1011
216	Young	Ralph	Director Of Environmental Services - Cotswold District Council	1012
261	Young	Jason		1015

List of Abbreviations and Acronyms used within officer's responses

For a definition of any of the technical terms used by officers within this report, please refer to Joint Technical Evidence Paper WCS-MCS - 8 Glossary (available from http://www.gloucestershire.gov.uk/index.cfm?articleid=18014)

AAP	-	Area Action Plan
AD	-	Anaerobic Digestion
AONB	-	Area of Outstanding Natural Beauty
APC	-	Air Pollution Control
ATT	-	Advanced Thermal Treatment
C&I	-	Commercial and Industrial (Waste)
CHP	-	Combined Heat and Power
DEFRA	-	Department for Environment, Food & Rural Affairs
EA	-	Environment Agency
EfW	-	Energy from Waste
EIA	-	Environmental Impact Assessment
FRA	-	Flood Risk Assessment
GCC	-	Gloucestershire County Council
HGV	-	Heavy Goods Vehicle
HIA	-	Health Impact Assessment
HRA	-	Habitats Regulations Assessment
JMWMS	-	Joint Municipal Waste Management Strategy
MBT	-	Mechanical Biological Treatment
MOD	-	Ministry of Defence
MSW	-	Municipal Solid Waste
NHS	-	National Health Service
PCT	-	Primary Care Trust
PFI	-	Private Finance Initiative
PPS10	-	Planning Policy Statement 10: Planning for Sustainable Waste Management
PPS12	-	Planning Policy Statement 12: Local Spatial Planning
PRN	-	Principal Road Network
RAF	-	Royal Air Force
RSS	-	Regional Spatial Strategy
SA	-	Sustainability Appraisal
SFRA	-	Strategic Flood Risk Assessment
SRN	-	Strategic Road Network
SSSI	-	Site of Special Scientific Interest
TA	-	Transport Assessment
TBC	-	Tewkesbury Borough Council
WCS	-	Waste Core Strategy
WDA	-	Waste Disposal Authority
WPA	-	Waste Planning Authority

Number 276 Type IND Name K Abbott Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	

4. Please give a reason for your answers to Question 3.

I am writing to you in connection with the proposed siting of the new waste disposal areas. I am of course a member of the Cheltenham & District Clay Club and would urge you not to site it in (area c) as this would mean myself and at least two hundred other members would have to find an alternative ground for our sport locally (and there are none). The club has been there for many years and as enhanced the landscape. I believe there are alternative sites already vacant and with more accessibility i.e close to motorways etc. Also have you considered the amount of heavy traffic using these narrow roads to Wingmoor Farm though Bishops Cleeve and Stoke Orchard.

4. Officer Response.

Comments noted. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the inclusion criteria for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that this site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 277 Type IND Name I Abbott Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	

4. Please give a reason for your answers to Question 3.

I am writing to you in connection with the proposed siting of the new waste disposal areas. I am of course a member of the Cheltenham & District Clay Club and would urge you not to site it in (area c) as this would mean myself and at least two hundred other members would have to find an alternative ground for our sport locally (and there are none). The club has been there for many years and as enhanced the landscape. I believe there are alternative sites already vacant and with more accessibility i.e close to motorways etc. Also have you considered the amount of heavy traffic using these narrow roads to Wingmoor Farm though Bishops Cleeve and Stoke Orchard.

4. Officer Response.

Comments noted. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the inclusion criteria for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that this site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 256 Type IND Name N and D A Adams Organisation not applicable/not provided

17. Do you have any comments on Section 3?

We write to object to the use of all 13 sites listed for possible waste treatment in Gloucestershire on the grounds that: Any of these sites could be used for incineration, which we oppose; Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents, which is unacceptable. We understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. The long term costs to the taxpayer will be higher with incineration; Incinerators act as a disincentive to reduce, reuse and recycle; The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas; Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer; Large incinerators in other areas of the country are already deemed to be a mistake.

17. Officer Response.

With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10 Planning for Sustainable Waste Management, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the publication Waste Core Strategy are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 304 Type IND Name Christine Adamson Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

One locality should not have to endure the constant traffic, smells etc of the whole county. There should be sites within easy reach of the source of waste. Cut down on travel.

2. Officer Response.

Comment noted. Zone C includes Gloucester and Cheltenham which is where most of Gloucestershire's waste originates. Providing waste treatment within this Zone will ensure that this waste is treated close to source in line with national and regional policy and helping to reduce the distance travelled. Other sites outside Zone C have been identified to provide flexibility and support for the sites within Zone C. The use of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community. In terms of traffic, PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by development criteria including those relating to transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. Odour, along with noise and dust are matters that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any sensitive receptors. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning conditions.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

As Q2. I live adjacent to seven of these sites and my life is blighted by HGV's, mud on the road, windscreens obliterated , a dirty car all the time, smells, flies. Why would I request any further activity?? Our properties are de-valued. The area is just one big dump for Gloucestershire and is totally unfair.

4. Officer Response.

Comments noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants.

Number 304 Type IND Name Christine Adamson Organisation not applicable/not provided

However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10 which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. Importantly, the re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community. Odour, noise and dust are matters that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any sensitive receptors. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning conditions. With regard to pollution it should be noted that planning and pollution control regimes are separate but complimentary. Pollution control is concerned with preventing pollution whilst planning controls the development and use of land. Waste planning authorities are expected to work on the assumption that the relevant pollution control regime will be properly applied and enforced. It should be noted that the effect of development, waste related or otherwise, on house prices, is outside the scope of the planning system.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Agree

6. Please give a reason for your answer to Question 5.

There should be local ownership of their own rubbish.

6. Officer Response.

Support noted. The integration of waste management facilities into the urban extensions would allow waste from these developments and the wider Gloucester and Cheltenham area to be treated close to source in line with national and regional policy. However, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead their waste management requirements will be addressed through the general policies and requirements of the WCS.

8. Please give a reason for your answer to Question 7.

I do not support the main sites but support diverse sites (as above)

8. Officer Response.

Support noted. It is essential that the WCS provides a clear strategy setting out what will be built and where. This will provide certainty and confidence to the development industry and help bring proposals forward. The Council's preferred strategy is to focus the location of new strategic waste management facilities on the area defined as Zone C. This approach is considered to be consistent with national policy (PPS10) and the Regional Waste Strategy. Although the preferred focus for strategic waste management is Zone C, a number of other sites were identified outside this zone in the Forest of Dean and Cotswold District in order to provide suitable flexibility and support for the Zone C sites. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed

Number 304 Type IND Name Christine Adamson Organisation not applicable/not provided

over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

Diversity - as above

10. Officer Response.

Comment noted.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

diversity - as above

12. Officer Response.

Support noted.

14. Do you have any comments on the Executive Summary?

How can we decide when no real details are given. I support the reduction of waste but we need solutions not rhetoric.

14. Officer Response.

Comment noted. It is assumed by details that the respondent is referring to technology. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.

15. Do you have any comments on Section 1?

The road show was impossible, room too small to cope with all visitors.

15. Officer Response.

Comment noted. The venue for the Bishops Cleeve roadshow was the best available during the consultation period in the local area. The high numbers of people

Number 304 Type IND Name Christine Adamson Organisation not applicable/not provided

were welcome as it was a clear sign of public interest in the consultation.

17. Do you have any comments on Section 3?

Many sites near to waste production then Jo Bloggs would be more aware of his/her responsibiltiy. Why should one rural area have the County waste when most is generated in the urban areas. Where is our green and pleasant land??

17. Officer Response.

Comments noted. Whilst the focus of the Waste Core Strategy is the central area of the county referred to as Zone C, sites may come forward outside this zone subject to certain criteria where there proves to be interest from the waste industry.

18. Do you have any comments on Section 4?

As above. All environmental conditions should be rigidly adhered to - not dismissed if they wish. Presently the conditions are flouted with no consequences except for the poor suckers who live in the area.

18. Officer Response.

Comment noted. The deliverability, implementation and monitoring frameworks described in Section 4 and set out at Appendix 4 and 5 explain how the site options will be delivered in terms of timing, delivery mechanisms and agencies as well as how this will be monitored. The frameworks have been expanded in the publication WCS. The issues referred to in this representation i.e. planning conditions being flouted are outside the scope of the WCS and fall within the scope of planning enforcement.

20. Do you have any comments on the Habitat Regulations report?

There should be good green screening that is maintained to add to the area not hide behind it.

20. Officer Response.

Comment noted. Landscaping will be a planning matter for any detailed proposals that come forward.

Number 336 Type IND Name P Allen Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I'm not sure/I don't know

2. Please give a reason for your answer to Question 1.

Those areas do not concern me

2. Officer Response.

Comment noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

Even the talk of this land being used as already made selling my home more difficult in a very difficult housing market. This could lead to me suffering financial loss that I will be looking to fully recover. Anyone would be insane to consider dumping rubbish in the centre of a town, and there is already too much traffic and pollution.

4. Officer Response.

Comment noted. The WCS Site Options document contains no proposals to dump rubbish rather it seeks to identify a suitable site on which to locate a waste treatment facility. This will reduce the need to dump rubbish to landfill by treating it instead and recovering value from it in line with the waste hierarchy. The effect of development on house prices, waste related or otherwise, is outside the scope of the planning system.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Disagree

7. Do you support the identification of sites outside Zone C?

I'm not sure/I don't know

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X

Number 336 Type IND Name P Allen Organisation not applicable/not provided

3. Land at Lydney Industrial Estate, Lydney			X

11. Do you support the approach of using a combination of sites within and outside Zone C?

I'm not sure/I don't know

14. Do you have any comments on the Executive Summary?

I thought the Railway Triangle was to be made a place in Gloucester we could be proud of, not a tip!

14. Officer Response.

Comment noted. The site in the Site Options consultation document (Site 7) was land to the north of the railway triangle, not the triangle itself. For information, Site 7, has not been taken forward into the publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 215 Type CCLLR Name Dennis Andrewartha Organisation County Councillor

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Dispersal should be over the whole County with smaller Units. Syhould minimise transportation of residual waste.

2. Officer Response.

Comment noted. The rationale underpinning Zone C is that it includes Gloucester and Cheltenham which is where most of Gloucestershire's waste is generated. Treating this waste close to source is consistent with national and regional policy. The site options consultation paper identifies 3 sites outside Zone C to provide flexibility and support. Other sites outside Zone C were included in an initial 'long-list' of sites but excluded for various reasons including site size, flood risk, highways and deliverability. The council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the county. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. The advantages and disadvantages would be investigated further during procurement process. The use of transfer facilities to 'bulk-up' waste from smaller collection vehicles into larger vehicles, will help to reduce the number of separate trip movements that need to be made for the waste to reach the treatment/recovery facility/facilities.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre	X		
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester	X		
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

Sites marked yes or no I am familiar with other I am not. In my case a suitable means for a small installation not one to cover the whole County.

4. Officer Response.

Comment noted. In terms of the size of installation at this stage it is not known whether residual treatment of municipal waste will be in the form of one large site, or several smaller sites. Please also see response to Q2.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Number 215 Type CCLLR Name Dennis Andrewartha Organisation County Councillor

Strongly Agree

6. Please give a reason for your answer to Question 5.

Heat/Energy from waste is best developed in conjuntion with a market i.e. new residential or employment projects.

6. Officer Response.

Support noted. The provision of waste treatment facilities within the urban extensions would present the opportunity to use locally generated heat and power within the development. However, it is significant to note that the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, Government's intention to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

See my answers to Q1 etc.

8. Officer Response.

see response to Q1 etc

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

Not familiar with the sites. Why none in the Cotswold District?

10. Officer Response.

Comment noted. Foss Cross is within Cotswold District. Other sites in Cotswold District were considered on a long-list of 329 sites but subsequently dropped for various reasons including site size, location, flood risk, highways and deliverability. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. Foss Cross will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I'm not sure/I don't know

12. Please give a reason for your answer to Question 11.

Whilst I support the concept of spreading the sites you are attempting to lead me in to your limited spread and apparent protection of the Cotswold District.

12. Officer Response.

Number 215 Type CCLLR Name Dennis Andrewartha Organisation County Councillor

Support for dispersed approach noted. Over 300 individual parcels of land in the county were originally identified as fulfilling the 'inclusion criteria' discussed in Technical Evidence paper WCS-N. After following the process discussed, over 100 of these sites (across all six districts - including the Cotswolds) had technical assessments carried out on them and the only site in the Cotswolds found to be available and potentially suitable for residual waste management treatment was the Foss Cross site, as indicated in the consultation document.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

Farmland in Cotswolds owened bt GCC!

13. Officer Response.

Comment noted. Although there may be sites available in more isolated locations away from populated areas, locating strategic waste management facilities in these areas would be contrary to policy laid out in PPS10 and the Regional Waste Strategy which require waste to be treated close to source in accordance with the proximity principle. Furthermore, in line with Government policy, the Council sought to prioritise previously developed land over undeveloped greenfield sites. Whilst small scale agricultural buildings may be suitable for some forms of waste use, criteria based policy within the publication WCS will allow for speculative proposals of this type to be determined.

Number 397 Type OA Name Philip Anelay Organisation North Somerset Council

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Thank you for the opportunity to comment. I support the principle of focussing the search for sites on zone C which includes the main urban and potential growth areas of Gloucester and Cheltenham and avoids the AONB and flood plain.

2. Officer Response.

Support noted.

Number 449 Type HEAL Name Shona Arora Organisation Gloucestershire NHS

17. Do you have any comments on Section 3?

Location of Sites and Methodology of Disposal - We are unable to comment at this stage on individual sites and method of disposal due to the large numbers of possible combinations of site and methodologies. NHS Gloucestershire understands that from the initial list of proposed waste sites a shortlist will be drawn up and the potential technologies for each site explored in more detail at this stage. NHS Gloucestershire feels more readily able to comment with regard to individual sites and treatment methods at this time. NHS Gloucestershire would welcome the opportunity to be consulted at this stage - particularly in relation to how the potential impacts to health will be assessed. NHS Gloucestershire supports the use of Health Impact Assessments (HIA) undertaken as part of a wider process and is able to provide support for the screening and scoping of a proposal to ensure that all areas relating to health are suitably covered. HIAs provide a crucial role in improving and protecting community health and wellbeing. It is also important to emphasise that the current state of science means that HIAs need to take a more qualitative approach to analysing impacts than that conventionally used for some analyses within EIAs. It is recognised that the original Sustainability Appraisal report used a limited approach to the term "health and wellbeing" (predominantly SA Objective 1). This in turn has limited the scoring system applied by using this approach. Data sources referred to in this area are extremely limited. Wingmoor Sites Gloucestershire County Council will be aware of the longstanding involvement of NHS Gloucestershire (and the predecessor organisation) regarding the landfill sites and waste treatment plant at Wing moor Farm. In October 2005 the then Cheltenham and Tewkesbury Primary Care Trust produced a Bishop's Cleeve Health Profile due to the concerns raised by local people about the impact of their health of the hazardous waste site. In March 2009 the findings of a community HIA were presented to the Gloucestershire Health Overview and Scrutiny Committee (HOSC). The report was brought together by a Steering Group of local people from the community who were in close proximity to the Wing moor sites, and facilitated by NHS Gloucestershire Public Health department. NHS Gloucestershire would refer you to the report and the recommendations (referred to as key areas for action) arising from this report which provide additional information as to the specific areas of perceived fears and concerns from the community with regard to the operations related to the sites. The full report and appendices including the above referred to health profile can be found at: http://glostext.gloucestershire.gov.uk/CeListDocuments.aspx?CommitteeId=114&MeetingId=5641&DF=13/03/2009&Ver=2 Sustainability- In line with the NHS commitment to sustainability, NHS Gloucestershire supports appropriate services and initiatives that contribute to carbon reduction. NHS Gloucestershire has signed up to the NHS Carbon Reduction Strategy and as a contributor to waste is conscious of its obligations to reduce, reuse and recycle wherever this is possible and undertakes this in line with its sustainability commitment. NHS Gloucestershire would comment that it is important that any site chosen and the design of that site preserves and enhances bio-diversity and is adaptable to change throughout the lifetime of the site to adapt to for example new technology, targets etc. With regard to sustainability, ready access differs greatly between sites and in support of sustainability we would support a site that enabled traffic to readily access the site and reduced the number of miles travelled. We acknowledge this has to be balanced against the potential impact this may have on neighbouring residences.

17. Officer Response.

Comments noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. NHS Gloucestershire will be invited to comment on the Publication WCS. The potential role of Health Impact Assessments (HIAs) is acknowledged. At the present time such assessments, unlike Environmental Impact Assessment (EIA) are not mandatory. The issue of health has been addressed to date through the broader process of Sustainability Appraisal (SA) and this will continue to be the case with a final SA report to be published alongside the Publication WCS. The site options SA was carried out by independent consultants using an established methodology. The Council is fully aware of the various health studies carried out in relation to the Wingmoor Farm sites including the Neighbourhood

Number 449 Type HEAL Name Shona Arora Organisation Gloucestershire NHS

Health Profile (October 2005) and the Community Health Impact Assessment (March 2009). The Health Profile (2005) showed that rates of respiratory disease were consistent with the rest of the county and that the incidence of cancer was no lower or higher than would be expected based on national rates. It also demonstrated average rates for congenital abnormalities and rates of asthma. The HIA (2009) demonstrated that currently there was no definitive evidence to demonstrate that health has been affected by living near the Wingmoor sites. With regard to carbon reduction, tackling climate change is a central tenet of the WCS. The purpose of the site options consultation was to identify sites suitable for the treatment of residual municipal waste. This will help to divert waste from landfill which in turn will help to reduce methane emissions a major contributor to climate change. Reduce, re-use and recycle will also form a central part of the WCS. With regard to biodiversity, the sites identified in the consultation have all been assessed in terms of their potential impact with key considerations e.g. proximity of key wildlife site, highlighted accordingly. Any strategic site allocation made in the Publication WCS will further highlight such issues. With regard to sustainability and accessibility, all sites have been subject to an initial transport assessment with key issues identified appropriately. Any strategic site allocations made in the Publication WCS will specify a requirement for a Transport Assessment (TA) accordingly.

Number 393 Type IND Name Andrew Ashcroft Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

May rule out some appropriate sites, limits options. Concentrates on centres areas of high population density.

2. Officer Response.

Comment noted. It is essential that the WCS provides a clear steer on the preferred location for new strategic waste management facilities. Zone C has been identified as the preferred location for a number of reasons including the fact that it avoids the floodplain and Cotswold Area of Outstanding Natural Beauty, is consistent with Government Policy (PPS10), the Regional Waste Strategy and reflects the fact that Gloucester and Cheltenham are where most of the County's waste is generated. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should `provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. Whilst identifying a remote site away from residential areas may seem a good idea such an approach would be contrary to national and regional policy which requires waste to be treated close to source.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

Site 7 unsuitable because it is practically in the centre of the City, in a residential neighbourhood. It is inconceivable that the county's refuse vehicles would be funnelled into this area, to disrupt traffic to the hospital, schools, and residential areas. the proposal would blight one of the city's most pleasant residential areas, and provoke bitter protests! Doubts about toxic fumes and fears for traffic accidents, noise, air pollution particulates, and smell. Are we looking to regain the notoriety the city gained from the Westgate street smell?

Number 393 Type IND Name Andrew Ashcroft Organisation not applicable/not provided

4. Officer Response.

Comments noted. In relation to Site 7, Land North of Railway Triangle, the site has not been taken forward into the publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Disagree

6. Please give a reason for your answer to Question 5.

Waste treatment plant should be sited away from urban areas

6. Officer Response.

Comment noted. See previous response.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

Increased flexibility.

8. Officer Response.

Support noted. It is essential that the WCS provides a clear strategy setting out what will be built and where. This will provide certainty and confidence to the development industry and help bring proposals forward. The Council's preferred strategy is to focus the location of new strategic waste management facilities on the area defined as Zone C. This approach is considered to be consistent with national policy (PPS10) and the Regional Waste Strategy. Although the preferred focus for strategic waste management is Zone C, a number of other sites were identified outside this zone in the Forest of Dean and Cotswold District in order to provide suitable flexibility and support for the Zone C sites. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy

Number 393 Type IND Name Andrew Ashcroft Organisation not applicable/not provided

and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

11. Do you support the approach of using a combination of sites within and outside Zone C?

I'm not sure/I don't know

13. Are you aware of any other sites that might be suitable for treating municipal waste?

NoIt

13. Officer Response.

Noted.

14. Do you have any comments on the Executive Summary?

It seems to me that the decision on the method of treating residual waste should be the priority

14. Officer Response.

At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10 which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.

15. Do you have any comments on Section 1?

no

15. Officer Response.

Noted.

16. Do you have any comments on Section 2?

no

16. Officer Response.

Noted.

17. Do you have any comments on Section 3?

Site selection would dependent on treatment method adopted

17. Officer Response.

Comment noted. See previous response.

Number 393 Type IND Name Andrew Ashcroft Organisation not applicable/not provided

18. Do you have any comments on Section 4?

no

18. Officer Response.

Noted.

19. Do you have any comments on the Sustainability Appraisal reports?

no

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

This section is totally inadequate.

20. Officer Response.

Comment noted. The HRA report has been prepared on the basis of the best current guidance and advice from government as well as emerging best practice. A further report will be prepared by independent consultants in support of the Publication WCS.

Number 295 Type IND Name Christopher Ayers Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester	X		
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

Good transport links and close proximity to main source of arisings.
****Additonal comments made following additonal consultation on Moreton Valence****:
Changing nature of waste. Over the last 60 years domestic rubbish arisings have changed in makeup from heavier, dense, to more volumetric waste for the following reasons: a. The change from open hearth or kitchen boiler, house heating, to central heating. In the former period any waste paper or cardboard, wood or other combustibles were added to the domestic fires which thus reduced the volume, saved money on fuel, but also produced ash (in addition to the ash from the coal) which was dense and of relative low volume. Hence the dustman or binman was quite often known as the Ashman. This ash mixed with other household rubbish arisings and absorbed fluids, thus reducing flies. Once central heating came about combustible rubbish could not easily be disposed of at home. b. Increases in the range of packaging materials, greater emphasis in prepacking to smaller pre packed quantities and non recyclable packaging. This virtually coincided with the move to central heating mentioned above and thus little was burnt at home. Waxed paper, greaseproof paper, and brown paper bags were replaced by plastics which did not burn so well at low temperatures. The volume of packaging increased dramatically and thus the volume of waste packaging increased. c. Scrap recovery. Many household items were made of iron or steel (albeit enamelled or galvanised - now replaced by plastic) and there was a thriving market for scrap metal whether it be owners going to orbiting rag and bone men (shades of Steptoe), taking it to the local 'scrappy', scavenging from dumps or organised extraction at point of disposal. As a child in the 1940s/50s I would go out with my mates to collect scrap and sell it for extra pocket money - it was quite a nice little earner but it kept it away from landfill as well as keeping the area tidy. d. Re useable containers. Most bottles were made of glass and chargeable. Thus little went into the rubbish (another nice little earner for children). It is interesting to note that the Danish Govt will not allow non reusable drinks containers such as cans so as to reduce the volume of rubbish and improve local street cleanliness! e. Time expiry or sell by dates. These did not exist and consequently food was rarely binned. Also, people did not die in droves because of food poisoning! Volume - the main objective behind all the current propaganda is to reduce the volume (or cube) of waste to be disposed of, which should be done as safely as possible, at minimum expense. The only sensible way to do this is to incinerate combustible waste since a very large percentage of it contains paper or packaging materials, soiled newspapers, plastic etc. Using modern incinerators this dramatically reduces the volume and thus the resultant cube of disposal. Additionally, there are heat and energy by products. In Copenhagen in Denmark the city rubbish is incinerated and the heat used to supply hot water to quite an area of flats. The Danes, who are very environmentally conscious, do so why cannot we? Strategically placed incinerators could reduce the volume of domestic waste considerably, reduce the landfill, and thus the landfill tax expenditure. Dover City Council operates a superb incinerator which quickly gobbles up

Number 295 Type IND Name Christopher Ayers Organisation not applicable/not provided

household furniture and other large rubbish brought to the site. Location. Waste disposal points need to be at optimum geographic points so as to reduce unnecessary, recurring, road running in order to reduce the cost of transport (especially fuel burn) and better utilise the Binmen (I am sure this is not PC Ashmen then) operatives who are not working when the truck is travelling to the waste point; they are passengers. It is surprising that under your plans most of the Cotswolds waste has to be trucked out of the Cotswolds when there are many disused quarries and indeed quite a few working quarries that require backfill before restitution in the area. The Moreton Valence airfield location, whilst not in the Cotswolds, is an ideal location, especially since it can be accessed without having to traverse any major towns and is relatively rural so any incinerator clouds can disperse before the sandal brigade complain about having their sun blocked out on the few days of the year it shines. After all, Moreton Valence is a short distance from the old RAF Depot at Quedgeley where there was an active burning ground for bulk rubbish for many years! I hope that some of the above will be of use in your review and I look forward to seeing a nice new incinerator from the motorway when I drive past Moreton Valence.

4. Officer Response.

Support for sites (Easter Park, Javelin Park, Moreton Valence, Land north of Railway Triangle) noted.
****Response to additonal comments made following additonal consultation on Moreton Valence****:
Comments on the changing nature of waste noted. The County Council has a preferred strategy of locating strategic waste treatment facilities within what we term 'Zone C'. The zone is focused around Cheltenham and Gloucester as this is the location of a majority of the county's population and where most of the county's waste is produced. Support for Moreton Valence Airfield proposed extension site is noted.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Agree

6. Please give a reason for your answer to Question 5.

Avoid needless and continually, increasing, expensive road transportation costs.

6. Officer Response.

Support noted. The integration of waste management facilities into the urban extensions would allow waste from these developments and the wider Gloucester and Cheltenham area to be treated close to source in line with national and regional policy. However, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the Government's intention to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

Any sensible planning must have a number of fall back positions so as to avoid the need to start all over again when preferred options are proven not available.

8. Officer Response.

On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 295 Type IND Name Christopher Ayers Organisation not applicable/not provided

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester		X	
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

Access road from Fosse Way needs widening. Site layout needs improving.

10. Officer Response.

PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. Site layout would be a detailed matter for consideration at the planning application stage should a proposal come forward on this site. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. This site will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

Contingency planning and to minimise transportation from rural areas.

12. Officer Response.

Support noted. It is essential that the WCS provides a clear strategy setting out what will be built and where. This will provide certainty and confidence to the development industry and help bring proposals forward. The Council's preferred strategy is to focus the location of new strategic waste management facilities on the area defined as Zone C. This approach is considered to be consistent with national policy (PPS10) and the Regional Waste Strategy. Although the preferred focus for strategic waste management is Zone C, a number of other sites were identified outside this zone in the Forest of Dean and Cotswold District in order to provide suitable flexibility and support for the Zone C sites. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

There are a number of quarries in the North Cotswolds which have regular heavy transport and access. Instead of filling them in at a lower level why not utilise a worked out site for waste?

13. Officer Response.

Number 295 Type IND Name Christopher Ayers Organisation not applicable/not provided

Although quarries have historically been associated with waste disposal (namely landfill), this consultation was to discuss sites suitable for residual waste management treatment (not landfill). Quarries do not fall within the inclusion criteria outlined in Technical Evidence paper WCS-N (with the exception of those quarries with existing waste management licenses). One quarry (Huntsmans) in the North Cotswolds did have technical assessments carried out on it. However, the site was found to be unsuitable for residual MSW treatment due to highways issues. Please refer to Appendix C.3 of Technical Evidence Paper WCS-N.

14. Do you have any comments on the Executive Summary?

To long winded - what happened to the principle of concise English usage in the public sector.

14. Officer Response.

Comment noted. The consultation document was drafted with plain English in mind and made as easy to read as possible. However it was difficult to avoid the use of jargon, abbreviations and acronyms altogether and waste is a technical subject. The Publication WCS will be worded as simply as possible with a broad audience in mind.

15. Do you have any comments on Section 1?

As Q14.

15. Officer Response.

See previous response.

16. Do you have any comments on Section 2?

As Q14

16. Officer Response.

See previous response.

17. Do you have any comments on Section 3?

As Q14

17. Officer Response.

See previous response.

18. Do you have any comments on Section 4?

As Q14

18. Officer Response.

See previous response.

19. Do you have any comments on the Sustainability Appraisal reports?

As Q14

19. Officer Response.

See previous response.

20. Do you have any comments on the Habitat Regulations report?

AS Q14

20. Officer Response.

See previous response.

Number 150 Type IND Name Juliet Bailey Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I write concerning the proposed 13 sites for waste handling in the county Though they may be suitable site for local waste handling and recyling facilities of some sort, the huge incinerator that has been talked of is not appropriate technology at any of the sites, and this is crucial to deciding what site/sites are chosen. The amount of waste produced will probably decrease as packaging reduces and recycling becomes entrenched. Thus, to feed the incinerator would require import of waste from further and further afield, probably out of county. The pollution produced both by the incinerator itself and transporting waste to it would be considerable, even if the incinerator were run efficiently. I am confident that Gloucestershire County Council would not wish to be guilty of creating increased carbon use and pollution, and ask you to take this into account in your deliberations, ruling out at this stage the possibility of a large incinerator.

17. Officer Response.

Comments noted. Dealing with each in turn. It is important to note that the Council is currently technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10 which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. In terms of importing waste, the Council endeavours to deliver a solution to manage Gloucestershire's residual waste, not waste from outside the county. To promote flexibility of the solution and further recycling above the minimum 60% target, the council would be open to views on the treatment of Gloucestershire's commercial waste. It is important to note that household waste is only 25% of the total waste produced by Gloucestershire. With regard to pollution, PPS10 states that modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health. Furthermore, the detailed consideration of a waste process and the implications, if any, for human health is the responsibility of the pollution control authorities. It should be noted that planning and pollution control regimes are separate but complimentary. Pollution control is concerned with preventing pollution whilst planning controls the development and use of land. Waste planning authorities are expected to work on the assumption that the relevant pollution control regime will be properly applied and enforced. PPS10 also states that, where concerns about health are raised, waste planning authorities should avoid carrying out their own detailed assessments rather they should ensure, through drawing from Government advice and research and consultation with the relevant health authorities and agencies, that they have any advice on implications for health. The WPA duly sought the advice from the PCT/NHS through the site options consultation. With regard to CO2 emissions, waste management and the move away from landfill are driven by the Climate Change agenda. Climate change is a wider issue which the development of this solution can positively contribute. Carbon footprint is assessed as part of the life cycle analysis. GCC will ask for details of emissions management as well as any other foreseeable environmental impacts and plans to mitigate these will be requested during competitive dialogue. DEFRA have commented on this issue directly by stating: The plans (for Gloucestershire) could also make an important contribution to the drive to tackle climate change by delivering estimated net carbon savings of 33,800 tonnes in 2020, compared to the current arrangements, or 64,700 tonnes if the final technology solution includes combined heat and power.

Number 137 Type IND Name D Baker Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I am writing to register my objection to the possible erection of an incinerator to dispose of waste materials at any one of thirteen sites, particularly at Haresfield and Nastend. All sites are at the lowest level above sea level and the toxic ash will remain at this low level. No incinerator will be guaranteed not to malfunction. At times of low cloud and fog, which occurs in this area, the toxic ash will be borne on the moist droplets, creating a 'smog' like that I witnessed in London during the late 1930s and 1940s and caused many deaths. Consideration has not been given to sites within the County situated 150 metres above sea level that are accessible by motorways or major roads. Finally, the building of in incinerator in these areas of the Severn Valley would be a blot on the landscape.

17. Officer Response.

Comments noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10 which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. With regard to health, PPS10 states that modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health.

Number 319 Type IND Name P Baker Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

I am writing as I would like to express my objection to the proposed change of use to The Park, Stoke Orchard from a very popular shooting ground into a waste site. I have been a member of Stoke Orchard shooting club for the past 23 years, apart from the environmental implications; I have an issue with the lack of provision of shooting facilities if your plans go ahead - both for myself and the up and coming generations. Other sites have much better access to major roads and motorways. There is already lots of waste and landfill around Bishops Cleeve and Stoke Orchard, so why burden the area further? Our club has taken many years to get to where it is and the landscape developed with the planting of over 400 trees to enhance the layouts for the sport, this is not something that can be easily replaced. I urge you to reconsider.

4. Officer Response.

Comments noted. The re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the inclusion criteria for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from Tewkesbury Borough Council with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that this site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 102 Type IND Name Jamie Baldwin Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I write to object to the use of all 13 of the sites listed for possible waste treatment in Gloucestershire on the grounds that: a.. Any of these sites could be used for incineration, which I oppose. b.. Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. c.. I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. d.. The long term costs to the taxpayer will be higher with incineration. e.. Incinerators act as a disincentive to reduce, reuse and recycle. f.. The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas. g.. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. h.. Large incinerators in other areas of the country are already deemed to be a mistake. I urge you to seriously rethink this strategy and to look for a more sustainable solution that will encourage households to minimise waste and encourage the three R's.

17. Officer Response.

With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 325 Type IND Name Jacqueline Baldwin Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

It avoids floodplain area and Cotwold AONB. However, I do not support the use of any sites in city town centres especially land North of the Railway Triangle, Gloucester

2. Officer Response.

Support for Zone C noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. In relation to Site 7, Land North of Railway Triangle the site has not been taken forward into the Publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park			X

Number 325 Type IND Name Jacqueline Baldwin Organisation not applicable/not provided

9. Netheridge Sewage Treatment Works		X	
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

Haven't time to read main consultation document so can't comment of most of the sites. I would worry about flooding at Netheridge Sewage treatment works. I am opposed to the presence of Allstones at the Railway Triangle at it is let alone it being allowed to increase its operations.

4. Officer Response.

Comment noted. With regard to flood risk at Netheridge, the Strategic Flood Risk Assessment (SFRA) for this site indicates that there is some risk of flooding, but on a large part of the site the risk is low. The areas subject to flooding have been excluded from the process, and the remaining part of the site lies within Flood Zone 1. Any proposal of more than 1 hectare would need to be supported by a site-specific Flood Risk Assessment (FRA). Notwithstanding the above, the site has not been taken forward into the Publication WCS because, following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore, the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. The site's existing Anaerobic Digestion (AD) capacity for waste water and other assorted wastes is recognised and any additional increase in these facilities would be considered through other criteria-based policies in the WCS. In relation to Site 7, Land North of Railway Triangle the site has not been taken forward into the publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the Publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

6. Please give a reason for your answer to Question 5.

I have not read the main consultation document

6. Officer Response.

Number 325 Type IND Name Jacqueline Baldwin Organisation not applicable/not provided

Comment noted.

7. Do you support the identification of sites outside Zone C?

I'm not sure/I don't know

8. Please give a reason for your answer to Question 7.

see above

8. Officer Response.

Noted.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

as before

10. Officer Response.

See previous response.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I'm not sure/I don't know

12. Please give a reason for your answer to Question 11.

have not read main consultation document

12. Officer Response.

Noted.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

no

13. Officer Response.

Noted.

Number 391 Type IND Name Jamie Baldwin Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Smaller waste sites which incorporate recycling, anaerobic digestion and composting should be built so that the huge transport and traffic implications at a single site are removed. It also encourages people to use these facilities properly if they are closer to them. At least 10-12 sites should be used across the county and all should incorpate some form of community heating or power generation.

2. Officer Response.

Comment noted. The site options consultation paper identifies 13 potential sites suitable for waste management. Although some of these are capable of accommodating a 'one-site' solution, the consultation clearly explains that a combination of several sites could be used. At this stage it has not been determined whether one or more sites will be used. The council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the county. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. The advantages and disadvantages would be investigated further during procurement process. Highway impact has already been assessed as part of the site-selection process and further consideration will be given to this issue in determining which sites go forward into the Publication WCS. Any transport related obligations (e.g. junction improvements) will be specified in the relevant policy. Should a planning application come forward at any of these sites, a further, more detailed highway assessment would be carried out in the form of a Transport Assessment (TA) which would be required in support of any planning application. In terms of community heating and power generation a number of the sites identified in the site options consultation paper are located near major existing and/or potential users of heat. All sites offer the potential to export electricity to the national grid. Further evidence on the Combined Heat and Power (CHP) potential of the sites will be prepared in support of the Publication WCS.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X		
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre	X		
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester	X		
8. Nastend Farm, Stroudwater Business Park	X		
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West			

4. Please give a reason for your answers to Question 3.

Number 391 Type IND Name Jamie Baldwin Organisation not applicable/not provided

All siets identified seem reasonable but others should be added to the rest of the county to allow for smaller sites which incorporate waste, power generation and full recycling facilities. This is a huge opportunity to do something truly sustainable and for the Council to collect an income through heat/power generation.

4. Officer Response.

Comment noted. The site options consultation paper identifies 13 potential sites, 10 within Zone C and 3 outside. These 13 sites were drawn from an initial long-list of 329 sites which was reduced having regard to various factors such as site size, flood risk, highways and deliverability. Significantly, only three specific additional sites were submitted in response to the consultation and two of those are extensions to a couple of the 13 sites already identified. All of these sites are close to urban areas in line with national and regional policy. Identifying remote sites across the whole county would be contrary these policies. The potential for using heat and power generated through the treatment of waste is fully acknowledged. To provide flexibility, the Publication WCS will include a criteria based policy to allow for small-scale speculative proposals to come forward in appropriate locations and circumstances.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Agree

6. Please give a reason for your answer to Question 5.

Communities should be responisible for the waste they generate - this can only be done through providing waste sites within communities where the impacts are reaslised by everyone living there.Take a look at the commnuity composting idea at Bisley. It really does work across the whole community.

6. Officer Response.

Support noted. However, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a waste treatment facility or facilities as part of those proposals. Furthermore, the Government's intention to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

As above - waste sites should be far more localised and incorporate recycling, composting and anaerbic digesters - which are part of the new Feed in tariff system so teh Council can make money from introducing these!!!

8. Officer Response.

Comments noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations. With reference to comments on the use of the sites for localised recycling, composting and anaerobic digestion, it should be made clear that the WCS sites will be allocated for residual treatment of Municipal Solid Waste (MSW) and potentially residual Commercial & Industrial Waste (C&I). Recycling and composting is already taking place on sites in the County with increasingly positive recycling / composting rates year on year. Anaerobic Digesters work effectively with the right organic feedstock such as slurries, domestic food waste, food processing waste, crops grown specifically for AD and silage. They do not work well with a genuine residual waste feedstock e.g. items such as nappies, plastic bags, broken crockery, sanitary items, polystyrene packaging, cat litter etc.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

Number 391 Type IND Name Jamie Baldwin Organisation not applicable/not provided

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney	X		
3. Land at Lydney Industrial Estate, Lydney	X		

10. Please give a reason for your answers to Question 9.

More sites the better for reasons stated above

10. Officer Response.

Support for all sites noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. These sites will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the sites forward as an allocation at this stage does not mean that the sites are unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

As above

12. Officer Response.

See previous response.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

Individual parishes should be asked to provide a suitable area for their waste to be recycled, composted, digested etc. I live in Brimscombe and Thrupp Parish - a suitable site might be the brownfield site between the A417 and the canal.

13. Officer Response.

Comment noted. Importantly the consultation focused on sites suitable for residual waste treatment rather than recycling/composting (i.e. the waste leftover after all possible recycling/composting has taken place). Employment land in the Brimscombe/Thrupp area was investigated and had a site assessment carried out on it, but for various reasons did not make the consultation document. Please refer to Technical Evidence Paper WCS-N and Appendices including C.549 and C.553 for further details of the site selection process.

14. Do you have any comments on the Executive Summary?

Not really - think local and small - small is beautiful

14. Officer Response.

Comment noted.

Number 270 Type IND Name Mr and Mrs Bamford Organisation not applicable/not provided

4. Please give a reason for your answers to Question 3.

****Additional comments made following additional consultation for Moreton Valence****
We have been consulted by the owners, the Bamford family, of Old Airfield Farm, at the above site who wish to notify their strong objections to the proposed extension of the Smiths Gloucester Limited Waste Disposal Site at Moreton Valence Airfield. Our clients are currently involved in civil litigation in Gloucester County Court with the freeholders of the subject land, Messrs Dickenson, Gables Farm, Moreton Valence, Gloucester, whose tenants are Smiths Gloucester Limited. Part of the dispute between our clients and the Dickensons involves the sole means of access to Old Airfield Farm and Gables Farm, leading from the A38. Our clients own the central portion of the access road, over which the Dickensons and their tenants licensees etc were granted a permanent right of way in 1974. Since then however the Dickensons have widened the access road by leasing the adjacent strips from the freeholders Graham Williams and David Mervyn Williams of 1 Moreton Villa, Moreton Valence, Gloucestershire, GL2 7NA. Part of the litigation between our clients and the Dickensons involves the Dickensons having sued our clients in trespass for their continued use of the widened strips. The proceedings are currently adjourned pending continued negotiations between our clients, the Dickensons and the Williams. Given the slow progress of these negotiations, our clients are giving serious thought to reverting to their use of the original road and confining the use by their traffic and their tenants to that central portion. This will inevitably mean the potential for traffic hazard as the Bamford traffic will proceed along the central portion of the road whilst the Dickenson traffic will use the whole of the road. Our clients however feel that they have little choice but to revert to the narrower road, given the ongoing cost of the litigation. Our clients strongly submit that the current volume of traffic using the widened road would be enough to cause a major traffic hazard, should they be forced to revert to using their old road. They are particularly concerned by the probability of the net increase in traffic which would increase the hazard. They do not accept the indication that the traffic impact would be closer to neutral as appears in the assessment. Our clients make the further points in relation to the environmental and other constraints:-
1. The assessment indicates that there are no flooding issues at the site but in fact significant flooding occurred in the July 2007 floods. It is appreciated that this was an extraordinary event. However, our clients are concerned that the proposed extension by Smiths will mean hardcoring the agricultural land, running the greater risk of run off onto their land notwithstanding the existence of a drainage ditch between the adjoining plots. 2. Our clients also note under sensitive receptors that there are a small number of residential properties within 250 metres of the site boundary. The distance from our clients house on the Old Airfield site, has been measured at some 78 metres from the existing post and wire north/ south boundary fence and the proposed extended development, will be a considerable encroachment and interference with their enjoyment of their property. 3. Our clients have further concerns regarding the Smiths site, which we would summarise as follows:- (a) Their present activities generate a significant amount of dust which is particularly prevalent in the summer months. Their fear is that this will be exacerbated by the proposed extension. (b) Similarly they have concerns about the noise generated from the site machinery and the lorries attending site when dumping waste materials. (c) Lighting. We understand that Smiths site operates using search lights which come on as early as 6.00p.m. in the winter months. (d) They have general concerns about the affects of what appears to be a very significant extension of the Smiths site, coming much closer to their land. We submit therefore that these significant matters need to be taken into account when considering the proposed extension submitted by Smiths Gloucester Limited.
****comments submitted by Davey, Fanklin, Jones Solicitors on behalf of Mr & Mrs Bamford****

4. Officer Response.

****Response to additional comments made following additional consultation for Moreton Valence**** A full Transport Assessment will need to accompany any proposal for development. The TA should include a full assessment of the site access and routes to connect to the M5 at Junctions 12 and 13, and beyond to the wider principal road network. Contributions towards both maintenance and junction improvements along the transport routes to and from the site may be required. In particular improvements are likely to junction 12 to the M5 and on the more immediate principal road network such as the A38 and its junction with the B4008. The access junction from the A 38 to the site itself will likely require improvements due to its proximity to an existing junction on the western side of the A38 and an existing lay-by. It should be noted that the Highways Agency has programmed an improvement scheme for Junction 12 in 2010/11, but this does not preclude the requirement for the assessment of the impact of any development traffic upon the operation of the Junction. In relation to the concerns about flooding any planning

Number 270 Type IND Name Mr and Mrs Bamford Organisation not applicable/not provided

application on the site over 1ha in size would require a Flood Risk Assessment to be submitted with any mitigation measures identified where appropriate. Noise, dust and lighting are matters that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any sensitive receptors. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning conditions. With regard to pollution it should be noted that planning and pollution control regimes are separate but complimentary. Pollution control is concerned with preventing pollution whilst planning controls the development and use of land. Waste planning authorities are expected to work on the assumption that the relevant pollution control regime will be properly applied and enforced.

17. Do you have any comments on Section 3?

My wife and live near this site at Moreton Valence which will be 90m from our properties. They have not landscaped the last site they built 5 years ago. Also the bund round the site has grown so high that it is like a small hill with a gap in it facing, our way allowing all the dust to enter our property. Floodlights are on at 6 o'clock in the morning and there is bleeping from machines and lorries reversing early in the morning 6 days a week. There is a flood risk with the whole site which will be with 4 large buildings 300,000 square feet which has been developed since 2005. All the water from the site travels down the south side down the road to the A38 where the pipe is only 2'6" to 3' under the road and will cause flooding to the house at the other side of the road. Also I do not want the ditch on my property to be polluted. The site has a 2 '6" high pressure British Gas main which will run through the site 200m long and is now 50 years old. This site so near our property will spoil our quality of life.

17. Officer Response.

Comments noted. Landscaping will have been dealt with during the previous planning application for this site. If landscaping has not been carried out in accordance with the planning conditions laid down, this may be a matter for planning enforcement. Operating hours will have been agreed through the planning permission. Again if these are being ignored, this will be a matter for planning enforcement. Flood risk has been assessed at all of the 13 sites identified in the site options consultation paper. The assessment showed that land at Moreton Valence is not at risk of flooding. With regard to pollution, PPS10 states that modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health. It should be noted that planning and pollution control regimes are separate but complimentary. Pollution control is concerned with preventing pollution whilst planning controls the development and use of land. Waste planning authorities are expected to work on the assumption that the relevant pollution control regime will be properly applied and enforced. The presence of a gas main is a matter for further consideration should a detailed proposal come forward. It does not preclude the possibility of development.

Number 348 Type IND Name Joanne Barnett Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

most in built up areas

2. Officer Response.

Concerns about sites/facilities in built-up areas is noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch			
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre	X		
6. Land at Moreton Valence		X	
7. Land north of Railway Triangle, Gloucester	X		
8. Nastend Farm, Stroudwater Business Park	X		
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West			

4. Please give a reason for your answers to Question 3.

should not be in a built up area

4. Officer Response.

Comment noted. Please see previous response.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

Number 348 Type IND Name Joanne Barnett Organisation not applicable/not provided

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

unless you have time to read whole document this questionarie is usless. no incinerator should be in a built up area..especially the triangle..too close to hospital and various schools....metz way is a main route into the city, needs to be used effectivly....not as a dumping ground

10. Officer Response.

Comment noted. A shorter, summary version of the consultation paper (8 pages) was made available alongside the main consultation document (74 pages). In terms of incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. In relation to Site 7, Land North of Railway Triangle, the site has not been taken forward into the publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I'm not sure/I don't know

Number 235 Type IND Name Fiona Bartlam Organisation Rifina

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
3. Easter Park, Ashchurch		X	

4. Please give a reason for your answers to Question 3.

This area is much too close to local households, and businesses!

4. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

6. Please give a reason for your answer to Question 5.

Disposal of resultant waste should be an integral part of any planning for housing

6. Officer Response.

Support noted. However, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the Government's intention to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

Number 255 Type IND Name S Bate Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I am writing to express my objection to the possible use of 13 sites for waste treatment in Gloucestershire. In particular, I object strongly to any proposals for incineration plants. Incineration is already outmoded as a waste disposal method for it involves the creation of toxic residue in the form of fly ash and other methods such as Mechanical Biological Treatment will better satisfy the criteria you are obliged to use. I am concerned that the use of incineration will involve extra traffic to move waste around the County. It is imperative that recycling is actively encouraged as an alternative to landfill and incineration. In Europe, even in rural areas there is a sophisticated recycling system that seems to be successful because people are made aware of the need to take responsibility for their own waste at a local level. I object most strongly to proposals for large incinerators on the grounds that such enormous structures are entirely inappropriate in any landscape in Gloucestershire which is essentially a rural environment.

17. Officer Response.

Comments noted. Dealing with each in turn. The Council is currently technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. As the Council is currently technology neutral, the traffic impact of any facility cannot be determined with absolute certainty. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by a further highway assessment with any necessary mitigation (e.g. junction improvements) clearly identified as site-specific requirements. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. The Council is actively promoting increased recycling and composting with a target of at least 60% by 2020. This is higher than the national target of 60% over the same period. However, there will always be a 'residual' element of waste that cannot be recycled or composted. Recovering value from this waste through appropriate treatment is consistent with the waste hierarchy.

Number 424 Type IND Name Chris Bates Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Its our rubbish

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

Nastend Farm is a green field site. Moreton Valance is already a waste treatment site

4. Officer Response.

Support for Moreton Valence noted. With regard to Site 8, Nastend farm, this site is a green field, but crucially it is allocated for employment use in the Stroud Local Plan, thus the decision on the acceptability of developing this land at some point in the future has already been taken. Notwithstanding the avove, the site has not been taken forward into the publication WCS because although the County Council is the landowner, following discussions with the County Council's Waste Disposal Authority (WDA) it would appear that there is significant uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore, the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

6. Please give a reason for your answer to Question 5.

No comment

6. Officer Response.

Number 424 Type IND Name Chris Bates Organisation not applicable/not provided

Noted.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

If better sites available, use them.

8. Officer Response.

Comment noted. On balance, having regard to forecast capacity requirements (i.e. the number of sites needed) and the need to manage waste close to source in line with national policy, it has been decided not to allocate any strategic sites outside the area referred to as Zone C (the central area of Gloucestershire). It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

No knowledge of these sites

10. Officer Response.

Noted.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

Use both if best solution

12. Officer Response.

Support noted

13. Are you aware of any other sites that might be suitable for treating municipal waste?

Old Berkeley Nuclear PS site - non active areas!!

13. Officer Response.

Berkley Power Station was initially investigated (ref Site 434) but this was found to fall outside of the 16km boundary from the fringe of the urban areas of Cheltenham and Gloucester and therefore no further assessment was carried out on the site. Please refer to Technical Evidence Paper WCS-N (Section 4 and Appendix A).

14. Do you have any comments on the Executive Summary?

No

Number 424 Type IND Name Chris Bates Organisation not applicable/not provided

14. Officer Response.

noted

15. Do you have any comments on Section 1?

No

15. Officer Response.

Noted.

16. Do you have any comments on Section 2?

No

16. Officer Response.

Noted.

17. Do you have any comments on Section 3?

I cannot understand how the report ranks Nastend Farm having "High Landscape suitability" while Moreton Valance only as "Medium Landscape Suitability". Appendix C 86 does not mention the Nastend Farm House is a listed building any building nearby should have minimal impact on it. The Appendix does not mention the Stonehouse Design Statement, approved by Stroud District Council Cabinet on the 6 October 2005. The specifically mentions that any new development on the Nastend Farm site should be such to minimise the impact on the landscape. The site is visible locally and will also have significant effect on long distance views from Haresfield Beacon and Frocester Hill both in an Area of Outstanding Natural Beauty.

17. Officer Response.

Comments noted. With regard to Site 8, Nastend farm, the landscape assessment was carried out by independent experts and duly incorporated into the site options consultation paper. It is important to note that Nastend Farm is already allocated for employment use in the Stroud District Local Plan, the principle of built development in this location already having been accepted.

18. Do you have any comments on Section 4?

No

18. Officer Response.

Noted.

19. Do you have any comments on the Sustainability Appraisal reports?

No

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

No

20. Officer Response.

Noted.

Number 288 Type DCLLR Name Gwen Belcher Organisation not applicable/not provided

17. Do you have any comments on Section 3?

A large incinerator is not the answer. It can not be flexible. So PFI funding of one large incinerator for the county is pretty stupid. I am for small anaerobic digesters, Mechanical Biological Treatment Plants in all Districts.

17. Officer Response.

Comment noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. In terms of flexibility, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Following the decision by Defra in October 2010 to withdraw Gloucestershire County Council's Private Finance Investment (PFI) credits (worth £92million), the council is currently carrying out a strategic review of the project. The outcome from the review will be considered by Cabinet in February 2011. Ultimately Gloucestershire County Council has to find an alternative to landfill. Doing nothing is not an option. The contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Research shows that PFI helps deliver projects on time and on budget more effectively than other types of procurement. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly (amortising cost over shorter period) and therefore being unaffordable or there would be a balancing payment on contract expiry. It should not be assumed that economies of scale mean an inflexible solution. GCC recognises that regardless of the type of solution proposed, it is important that the solution must be able to cope with changes in waste volumes and composition, as it is inevitable such changes will happen. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability or a reduced cost to the authority.

Number 157 Type IND Name E Bell Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I am writing to object to the use of all 13 of the sites listed for possible waste treatment in Gloucestershire on the grounds that: Any of these sites could be used for incineration, which I oppose. Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. The long term costs to the taxpayer will be higher with incineration. Incinerators act as a disincentive to reduce, reuse and recycle. The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. Large incinerators in other areas of the country are already deemed to be a mistake.

17. Officer Response.

With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 326 Type IND Name Michael Bellamy Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Waste sites should be situated close to the areas in which the waste is produced but not so close as to impinge on the environment of those areas

2. Officer Response.

Support for Zone C noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. Identifying remote sites some distance from Gloucester and Cheltenham would be contrary to national and regional policy which requires waste to be treated close to source.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch		X	
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

The sites marked as suitable seem to have minimum environmental and transport problems. However, the existing Allstone site on the railway triangle is unsuitable due to the nearby housing and totally inadequate road system. (written as a NIMBY!)

4. Officer Response.

Comments noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet

Number 326 Type IND Name Michael Bellamy Organisation not applicable/not provided

the needs of their own communities. In relation to Site 7, Land North of Railway Triangle, the site has not been taken forward into the publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

7. Do you support the identification of sites outside Zone C?

I'm not sure/I don't know

8. Please give a reason for your answer to Question 7.

I agree that areas outside Zone C could be used, the only proviso being that only waste produced in the area should be processed there so as to reduce transport needs

8. Officer Response.

Comment noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

Number 326 Type IND Name Michael Bellamy Organisation not applicable/not provided

12. Please give a reason for your answer to Question 11.

answered in Q8

12. Officer Response.

See previous response.

Number 30 Type IND Name R and I Berry Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch		X	
4. Javelin Park, Haresfield		X	
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence		X	
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works		X	
10. The Park, Wingmoor Farm West	X	X	

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester		X	
2. Hurst Farm, Lydney		X	
3. Land at Lydney Industrial Estate, Lydney		X	

17. Do you have any comments on Section 3?

We wish to register our objections to the use of all 13 sites listed for the possible waste treatment in Gloucestershire. We oppose the use of these sites which may be used for incineration as the effects of toxic waste dust on public health would be too great a risk to contemplate; also the effects of which may cause irretrievable damage to flora and fauna. Tax payer's money should be spent on active measures to recycle more waste. Green wheelie bins should be provided throughout the county for compost production, this could then be sold back to the public, offsetting costs of financing such initiatives. Mechanical Biological Treatment, including Anaerobic Digestion is a better solution to the problem environmentally and for the tax payer.

17. Officer Response.

Comments noted. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the

Number 30 Type IND Name R and I Berry Organisation not applicable/not provided

county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 133 Type IND Name David Berry Organisation The Coal Authority

4. Please give a reason for your answers to Question 3.

Thank you for consulting The Coal Authority on the above. Having reviewed your document, I can confirm that The Coal Authority does not wish to make any specific comments in relation to the sites identified within Zone C, as these are not located within the defined coalfield in Gloucestershire.

4. Officer Response.

Comment noted.

10. Please give a reason for your answers to Question 9.

Nevertheless, it is noted that two of the potential sites identified outside of Zone C are located at Lydney. Lydney lies on the boundary of the coalfield area within Gloucestershire, which incorporates a large part of Forest of Dean Council's administrative area. It is therefore possible that these sites may be affected by former coal mining activities. As such, and for any other sites within the coalfield area which might come forward for assessment during the consultation process, it would therefore be prudent to include an assessment of the coal mining position in relation to these sites. This would represent a due diligence check to ensure that the sites do not contain any mine entries or other coalmining related hazards which would require remediation or stabilisation prior to development. However, I would emphasise that former coal mining activities and related hazards are certainly not a strict constraint on development. Indeed, it would be far preferable for appropriate development to take place in order to help remove these public liabilities on the general tax payer. The Coal Authority would therefore not wish to see any of the potential sites being excluded from the assessment on the grounds of former mining legacy issues, as there is normally an engineering solution available to facilitate development.

10. Officer Response.

Due diligence comments welcomed. The Waste Planning Authority accepts that both the Lydney sites may need an assessment of former coalmining activities and associated hazards.On balance however, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. These sites will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the sites forward as allocations at this stage does not mean that the sites are unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 340 Type IND Name Glenda Berry Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Plenty of waste fields not used for farming now

2. Officer Response.

Support for Zone C noted however the Council's priority is, in line with national policy, on the re-use of previously developed land in preference to Greenfield sites.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

I do not know these areas so cannot comment on them sorry

4. Officer Response.

Noted.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Disagree

6. Please give a reason for your answer to Question 5.

The area is so built up in Gloucester, do not want anything else

6. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10 which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was

Number 340 Type IND Name Glenda Berry Organisation not applicable/not provided

produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. Notwithstanding this, it is significant to note that the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

I am sure areas in country would be more suitable

8. Officer Response.

Comments noted, however the Council's priority is, in line with national policy, on the re-use of previously developed land in preference to Greenfield sites.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
3. Land at Lydney Industrial Estate, Lydney	X		

10. Please give a reason for your answers to Question 9.

I do think this area right out of town might be suitable

10. Officer Response.

Support for Lydney industrial estate is noted. Having regard to forecast capacity requirements (i.e. the number of sites needed) and the need to manage waste close to source in line with national policy, it has been decided not to allocate any strategic sites outside the area referred to as Zone C (the central area of Gloucestershire). As this site is outside Zone C it is not being taken forward. Also, the lack of waste industry interest in response to this site through the site options consultation (2009) raises question marks over the deliverability of the site for waste management purposes. It should be noted that existing facilities for waste management are present on the site and their contribution to the County's waste network is recognised. Although the site has not been formally allocated in the Publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I do not support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

It needs to be outside areas

12. Officer Response.

Comment noted, see previous responses.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

Number 340 Type IND Name Glenda Berry Organisation not applicable/not provided

don't know any

13. Officer Response.

Noted.

14. Do you have any comments on the Executive Summary?

Royal Hospital too close to have more traffic problems

14. Officer Response.

Comment noted. In relation to Site 7, Land North of Railway Triangle, the site has not been taken forward into the Publication WCS.

15. Do you have any comments on Section 1?

no

15. Officer Response.

Noted.

16. Do you have any comments on Section 2?

no

16. Officer Response.

Noted.

17. Do you have any comments on Section 3?

no

17. Officer Response.

Noted.

18. Do you have any comments on Section 4?

no

18. Officer Response.

Noted.

19. Do you have any comments on the Sustainability Appraisal reports?

no

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

no

20. Officer Response.

Noted.

Number 178 Type IND Name Tim Besien Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
3. Easter Park, Ashchurch		X	

4. Please give a reason for your answers to Question 3.

There are a large number of residential houses close to the Easter Park site (e.g. Northway, Ashchurch). The gaseous emissions from any proposed waste treatment plant are likely to have significant health impacts on the local population. In addition there will also be significant noise and odour impacts on the residents of Northway and Ashchurch. In summary it is not appropriate to site a potentially polluting waste treatment site so close to a residential area - the risks are simply too great.

4. Officer Response.

Comments noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10 which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. Furthermore, although there are residential properties to the north of the site these are buffered by existing employment use. In terms of health impacts, PPS10 states that modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health. Furthermore, the detailed consideration of a waste process and the implications, if any, for human health is the responsibility of the pollution control authorities. PPS10 also states that, where concerns about health are raised, waste planning authorities should avoid carrying out their own detailed assessments rather they should ensure, through drawing from Government advice and research and consultation with the relevant health authorities and agencies, that they have any advice on implications for health. The WPA duly sought the advice from the PCT/NHS through the site options consultation. Odour, noise and dust are detailed matters that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any 'sensitive receptors. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning conditions. With regard to pollution it should be noted that planning and pollution control regimes are separate but complimentary. Pollution control is concerned with preventing pollution whilst planning controls the development and use of land. Waste planning authorities are expected to work on the assumption that the relevant pollution control regime will be properly applied and enforced. Notwithstanding the above, the site has not been taken forward into the Publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS Site Options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal

Number 178 Type IND Name Tim Besien Organisation not applicable/not provided

come forward this will be considered having regard to the relevant general policies of the WCS national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

11. Do you support the approach of using a combination of sites within and outside Zone C?

I'm not sure/I don't know

Number 412 Type IND Name Michael Bingham Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

The requirement for a waste strategy is mainly to reduce damaging emissions. This will be undermined by increased/increasing emissions from heavy vehicles travelling across the county both from The Forest of Dean and a vast area to the East of the M5. The Forest, Stroud and Cirencester should take more responsibility for processing their own waste. Commercial traffic movements must be kept to a minimum

2. Officer Response.

Comment noted. The proposed focus on Zone C is consistent with national and regional policy and reflects the fact that most of Gloucestershire's waste is produced at Gloucester and Cheltenham. It is important that this waste is managed close to source in order to reduce vehicular movements. In terms of movement of waste from further afield, the use of transfer facilities to 'bulk-up' waste from smaller collection vehicles into larger vehicles, will help to reduce the number of separate trip movements that need to be made for the waste to reach the treatment/recovery facility/facilities. A number of sites outside Zone C in the Forest of Dean, Stroud District and Cotswold District were identified in the initial long-list of sites but subsequently dropped for a number of reasons. The three sites outside Zone C that were identified in the site options consultation paper provide some scope for small scale treatment/supporting infrastructure. The Council's position in relation to sites outside Zone C will be clearly set out in the Publication WCS.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre	X		
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester	X		
8. Nastend Farm, Stroudwater Business Park	X		
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

Those suggested as suitable are not so close to large areas of population. I am totally opposed to the Wingmoor Park sites. I freely acknowledge a personal interest due to close proximity to these sites but because of this proximity, I can state with certainty that current management of the site leaves a lot to be desired. Noxious smells are a constant problem within a 4/5 mile radius dependent upon wind direction and virtually daily occurence within one to two miles. The site is too close to a large residential area and Stoke Road is inadequate to serve existing traffic let alone any future expansion. The statements made within the consultation document regarding traffic flows are at best ill informed. Commercial traffic habitually ignores the "turn right" instruction upon exit from the Grunden site and uses Stoke Road through Soke Orchard and Tredington to the A38. There is significant traffic in the opposite direction. Apparently there is no risk of flooding at this site. However, few residents will soon forget the appalling stench within a 5 mile radius in August/September 2007 blamed on leachate caused by flooding. This took some time to correct with Grendon having to be granted an extension to deal with the problem.

Number 412 Type IND Name Michael Bingham Organisation not applicable/not provided

4. Officer Response.

Support for sites (Javelin Park, Quadrant, Moreton Valence, Land north of Railway Triangle, Nastend Farm) noted. With regards to Wingmoor Farm, the comments relating to odour, proximity to residential development, traffic and flood risk are noted. Dealing with each point in turn. In terms of odour, this is a detailed issue along with other factors such as noise and dust that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any 'sensitive receptors'. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning conditions. It is also pertinent to note that a waste treatment facility is very different in nature to landfill with waste being delivered into an enclosed environment with little opportunity for odour to escape into the air. In terms of proximity to residential development, clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. With regards to traffic, PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. In terms of flood risk, the site has been subject to a detailed strategic flood risk assessment, which confirms that there are no significant flooding issues associated with this site. Notwithstanding this, any proposal of more than 1 hectare in size would in any case need to be supported by a site-specific Flood Risk Assessment (FRA).

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

6. Please give a reason for your answer to Question 5.

Local solution to local issue.

6. Officer Response.

Support noted. The integration of waste management facilities into the urban extensions would allow waste from these developments and the wider Gloucester and Cheltenham area to be treated close to source in line with national and regional policy. However, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

Number 412 Type IND Name Michael Bingham Organisation not applicable/not provided

8. Please give a reason for your answer to Question 7.

Reduced polution from commercial traffic and localities taking responsibility for their own waste rather than forcing it on to a few communities in the M5 corridor

8. Officer Response.

Support noted. PPS10 does support communities taking responsibility for their own waste. However, in practical terms, Zone C including the M5 corridor (Gloucester and Cheltenham in particular) is where most of the waste is being produced. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney	X		
3. Land at Lydney Industrial Estate, Lydney	X		

10. Please give a reason for your answers to Question 9.

Will reduce trafficing of waste across the county

10. Officer Response.

Support noted.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

self evident from previous answers

12. Officer Response.

Support noted. See previous responses.

14. Do you have any comments on the Executive Summary?

Largely a fair summary although I gain the impression that Zone C solution has been pre-determined

14. Officer Response.

Comment noted. As stated in the site options consultation paper, the Council's preferred strategy is to focus the search for strategic municipal waste sites primarily on the area defined as Zone C. This approach is consistent with national and regional policy. Views were invited on whether this approach is appropriate.

15. Do you have any comments on Section 1?

Well presented.

15. Officer Response.

Support noted.

16. Do you have any comments on Section 2?

Number 412 Type IND Name Michael Bingham Organisation not applicable/not provided

Informative

16. Officer Response.

Support noted.

17. Do you have any comments on Section 3?

Again the sites appear to have been pre-determined as the easiest options rather than using 'clear skys' or lateral thinking. Also am not convined by the "free of the flood plain" argument. Accept that currently largely avoids the Environment Agency map but the M5 corridor through the county most certainly did not escape the July 2007 floods

17. Officer Response.

Comment noted. The 13 sites identified in the site options consultation paper were drawn from an initial 'long-list' of 329 sites which was whittled down having regard to a range of factors including site size, location, availability, highways, flood risk and so on. They do not represent the 'easiest options' although clearly having a landowner that is happy for a site to come forward for waste use, helps to increase the likelihood of the site coming forward. Whilst Zone C largely avoids the expanse of floodplain located in the western part of the County, it is acknowledged that there are some parts of Zone C that are within a floodplain. All sites have been subjected to a Strategic Flood Risk Assessment (SFRA). Any proposal of more than 1 hectare, even if the site is not in the floodplain, would need to be supported by a detailed Flood Risk Assessment (FRA).

18. Do you have any comments on Section 4?

No

18. Officer Response.

Noted.

19. Do you have any comments on the Sustainability Appraisal reports?

No

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

No

20. Officer Response.

Noted.

Number 231 Type BUS Name Lucy Binnie Organisation Smiths Gloucester Ltd

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

In line with national and regional policy and is fundamental for sustainability reasons that strategic sites are well located relative to waste arisings.

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
6. Land at Moreton Valence	X		

4. Please give a reason for your answers to Question 3.

Site 6: Already dealing with a substantial throughput of waste, this site has planning permission for additional treatment facilities which includes household waste. The operator is committed to expanding waste management facilities to secure maximum diversion of waste from landfill and indeed is advancing plans since the original 'Call for Sites', even though all the current planning permissions are yet to be implemented are considering options for best configuration at site with view to developing further capacity beyond this, with complementary treatments etc. This, would be likely to require further land - to this end consider that the identified site should be extended so that this potential can be provided for to the secured. (Plan of extension submitted) As are not familiar with the details of the other sites, and the potential development of them, are unwilling to comment on the other sites

4. Officer Response.

Support for Site 6 noted. Having regard to all of the issues raised and taking particular account of likely deliverability and the need to manage waste close to source, it has been decided to take this site forward as a strategic site allocation within the publication WCS. The Council is not however convinced of the need to extend the site as suggested by the landowner in response to the site options consultation in 2009. The site boundary in the Publication WCS will therefore reflect that which was initially consulted on.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

6. Please give a reason for your answer to Question 5.

No strong opinion but given that development of WCS follows national and regional guidance and noting the likley central location of the majority of the urban expansion - which WCS is already focused on, query that it is necessary to spend time and effort on this with sites identified.

6. Officer Response.

The Government's intention to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

Feel should provide for opportunity to develop suitable sites which previously not identified and possibility that changes in technolgy may influence new types of

Number 231 Type BUS Name Lucy Binnie Organisation Smiths Gloucester Ltd

waste developments.

8. Officer Response.

Support noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

10. Please give a reason for your answers to Question 9.

Not familiar with the details of the sites, and the potential development of them, so unwilling to comment here

10. Officer Response.

Noted.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

Flexibility (see answer to Q8)

12. Officer Response.

Support noted. See previous response.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

See answer re Q4, plan attached

13. Officer Response.

Support for additional land at Smiths, Moreton Valence noted. The Publication WCS will set out the Council's position in relation to this site.

14. Do you have any comments on the Executive Summary?

A general concern about focus on municipal given volumes of other wastes notably commercial and industrial and clear need to provide strategic facilities to divert these wastes from landfill

14. Officer Response.

The site options consultation is focused on identifying sites for the treatment of municipal waste although for a number of sites the potential to also treat commercial and industrial waste is acknowledged. The Publication WCS will deal with all waste streams and the need to divert these from landfill.

15. Do you have any comments on Section 1?

Would benefit from clear overview of all waste streams and need for strategic facilities with some of these as general principles for providing for these sites are similar, if not almost identical in some instances.

15. Officer Response.

The Publication WCS will set out the position in respect of all waste streams in Gloucestershire and the proposed policy approach.

16. Do you have any comments on Section 2?

Undestandable focus on MSW given legal responsibilities of various authorities however return to need to provide strategic waste facilities for other waste streams

Number 231 Type BUS Name Lucy Binnie Organisation Smiths Gloucester Ltd

and as acknowledged in WSC documents often complementary and co located. GOSW letter commenting strategy was referring to 'strategic sites' and clear statement that only MSW not apparent.

16. Officer Response.

Comment noted. The council endeavours to deliver a solution to manage Gloucestershire's residual waste, not waste from outside the county. To promote flexibility of the solution and further recycling above the minimum 60% target, the council would be open to views on the treatment of Gloucestershire's commercial waste. The Publication WCS will set out the Council's position in relation to all waste streams. The representation from GOSW recommended the inclusion of strategic sites with a particular focus on sites to manage the residual element of municipal waste.

17. Do you have any comments on Section 3?

Again similar points to Q14, with other volumes - C&I together with MSW could have a figure nearer 400,000 tpa, if targets increase for C&I (as trend for MSW) could be even more. Para 3.10 consider primary focus more appropriate biodegradable, i.e. both MSW & C&I. Encouraging the sites for more than one waste stream presents a greater commercial incentive for developments and likely to encourage greater provision securing overall aims of policy in terms of diversion from landfill.

17. Officer Response.

Comment noted. Information on waste data will be updated in advance of the Publication WCS. The Publication WCS will have sufficient flexibility built in through a monitoring and delivery framework to allow for policies/proposals to be revised in light of changing trends/targets. The scope for treating both municipal waste and commercial and industrial waste together is acknowledged. The focus of the site options consultation is on identifying sites for municipal waste but the paper does acknowledge the potential for some sites to treat both of these waste streams provided the primary focus is municipal waste. The council endeavours to deliver a solution to manage Gloucestershire's residual waste, not waste from outside the county. To promote flexibility of the solution and further recycling above the minimum 60% target, the council would be open to views on the treatment of Gloucestershire's commercial waste. It is important to note that household waste is only 25% of the total waste produced by Gloucestershire.

18. Do you have any comments on Section 4?

Difficult when delivery is hands of other parties and also not easy to provide quantifiable measures, again focusing on MSW issues which may be understanable. AMR with qualitative comments is best option in terms of monitoring.

18. Officer Response.

It is essential that the policies and proposals set out in the publication WCS are deliverable and able to be monitored so that they can be revised/adjusted if they are not achieving their objectives. It is acknowledged that reliance on external parties creates an element of risk however the framework is intended to be flexible so that remedial action can be taken if the strategy is failing to deliver as intended. The role of the AMR in monitoring progress is fully acknowledged.

19. Do you have any comments on the Sustainability Appraisal reports?

Alot of good work has gone into these but are only on basis of generic assessment of needs of facilities and the actual developments may vary considerably for example such that a technology which was considered likely to be unsuitable may be acceptable and need to keep this flexibility in mind.

19. Officer Response.

Comments noted.

20. Do you have any comments on the Habitat Regulations report?

No

20. Officer Response.

Noted.

Number 126 Type IND Name Charles Bircher Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Due to likely increased transport costs, other urban centres' waste eg stroud, cirencester, would force large costs to move their waste to centralised depot(s). I would favour a more localised strategy to anticipate future higher oil/transport costs.

2. Officer Response.

Comment noted. Most waste in Gloucestershire is generated in Gloucester and Cheltenham. Providing facilities within Zone C will ensure that this waste is treated close to source in line with national and regional policy. The site options consultation paper identifies 3 sites outside Zone C, to offer support and flexibility for the sites within Zone C. Other sites were included in an initial long-list of sites but dropped for various reasons including site size, flood risk, highways and deliverability. In terms of a centralised versus dispersed approach, the site options consultation paper identifies 13 potential sites, 10 within Zone C, 3 outside Zone C. Views are invited on using a combination of different sites. The consultation makes it clear that whilst some of the sites are capable of providing a one-site solution, it may be that strategic waste management of municipal waste comes forward on several different sites. The council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the county. The publication WCS identifies four strategic site allocations within Zone C. Other sites can come forward where there is market interest, subject to relevant criteria.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X		
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre	X		
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works		X	
10. The Park, Wingmoor Farm West			

4. Please give a reason for your answers to Question 3.

7,8,9 suffer poor location (eg flood risk or poor road links) Other sites seem suitable (dependant on size) and possible up graded road links (eg Wingmoor Farm) would improve their suitability. Any option of ATT i.e pyrolysis or incineration would restrict proximity to residential areas due to possible emission problem.

4. Officer Response.

Comments on sites 7 (Land North of Railway Triangle), 8 (Nastend Farm) and 9 (Netheridge) noted. In relation to Site 7, since the site options consultation was undertaken in October 2009, the Waste Planning Authority has carefully considered all the issues related to this site. The site has not been taken forward into the publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road,

Number 126 Type IND Name Charles Bircher Organisation not applicable/not provided

Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). With reference to Site 8 the site has not been taken forward into the Publication WCS because although the County Council is the landowner, following discussions with the County Council's Waste Disposal Authority (WDA) it would appear that there is significant uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore, the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). With reference to Site 9, the site has not been taken forward into the Publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore, the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). It should be noted however that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations. With regard to advanced thermal treatment (ATT) it is important to note that the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

6. Please give a reason for your answer to Question 5.

As stated previously, I'm in favour of a decentralised approach, so dealing with waste generated near these proposed new areas would be an obvious for their waste.

6. Officer Response.

Support noted. The integration of waste management facilities into the urban extensions would allow waste from these developments and the wider Gloucester and Cheltenham area to be treated close to source in line with national and regional policy. However, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

Number 126 Type IND Name Charles Bircher Organisation not applicable/not provided

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

As previously stated for example Cirencester a site near to this town would be a good idea in the future.

8. Officer Response.

Comment noted. There is an existing waste transfer station in Cirencester. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney	X		
3. Land at Lydney Industrial Estate, Lydney		X	

10. Please give a reason for your answers to Question 9.

Depending on the type of processing, 1 and 2 should be suitable. 3 may prove a future flood risk if river levels rise according to some predictions (2 may be too low also, but is further from the Severn).

10. Officer Response.

Support for Sites 1a and 2a noted. In respect of flood risk at Site 3a, the Strategic Flood Risk Assessment Level 2 indicates that the majority of this site is not at major risk of flooding, but the access road (Harbour Road) and the far north west corner is in the functional floodplain i.e. Flood Zone 3b. This would be a matter for a site-specific Flood Risk Assessment (FRA) which would be required if a detailed proposal were to come forward on this site. Notwithstanding the above, n balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. These sites will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the sites forward as allocations at this stage does not mean that the sites are unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

As previous answers, to acheive a decentralised (minimising transportation costs) approach sites outside 'C' zone should be considered.

12. Officer Response.

Support noted. See previous response in relation to distribution of sites.

17. Do you have any comments on Section 3?

I am writing in response to the waste consultation (process....). Although reassured at Gloucester County Council's recent progress on the level (percentage) of domestic refuse that is recycled, I am concerned that one of the options being considered for residual waste is incineration. Even with heat recovery (or some electrical generation from heat produced) Incinerators have many disadvantages over alternatives such as Mechanical Biological treatment; even pyrolysis (listed as

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advanced thermal treatment) poses some serious problems. I'm generally in favour of a decentralised approach, i.e dealing with waste at several centres around the County, preferably near to where it is produced, thus reducing future transport costs due to likely escalating costs of oil I'm in favour of municipal composting schemes and am very pleased at the recent announcement to provide bins for kitchen waste only, hopefully to feed such a scheme. The decision to go for incineration would carry with it serious environmental and financial consequences into the future for people living in Gloucestershire. I would urge the leading (Conservative Group) of the Council to stick to its manifesto commitments and rule this option out (as has been done elsewhere in the Country). I work in the Waste recycling industry so benefit directly from employment provided by this 'future resource' and would urge decision makers to view positively investment in achieving better recycling rates thus removing the perceived need for an incinerator to deal with Gloucestershire's waste.

17. Officer Response.

Comments noted. Dealing with each in turn. The Council is currently technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. In terms of the distribution of sites, the council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the county.

Number 99 Type CCLLR Name Anthony Blackburn Organisation GCC Councillor

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

I realise that much work has been done about identifying sites but think that the search should be for smaller more local sites. Zone C seems to be an artificial planners' concept and the study seems to regard areas adjoining Gloucester in particular as Gloucester Fringe although it includes Standish and Haresfield parishes if not in AONB, then deserving to retain a rural character threatened by a waste plant. They are 'Cotswold Edge' not a dumping ground for Gloucester. Regard should be given to Sharpness/Berkeley (power station) and to the airfields in the Cotswolds as waste sites.

2. Officer Response.

Comment noted. It is essential that the WCS presents a clear spatial strategy setting out what will be built and where. Zone C has been identified as the preferred location for a number of reasons which are clearly articulated within the site options consultation document including the fact that it avoids the floodplain and AONB, is consistent with Government Policy (PPS10) and the Regional Waste Strategy and the fact that Gloucester and Cheltenham are where most of Gloucestershire's waste is produced. Sharpness was considered in preparing the site options consultation paper however it was ruled out on deliverability grounds. Berkeley Power station is considered to be too remoted from the main waste arisings in the County. One site in the Cotswolds has been identified at Foss Cross from an initial long-list of 329 sites across the County. Others were ruled out for reasons such as site size, location, flood risk, highways and deliverability.
Importantly, much of the Cotswolds is remote from the county's main waste arisings. Allocating land in those areas would be contrary to policy and lead to excessive waste miles being travelled.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X		
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre	X		
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works		X	
10. The Park, Wingmoor Farm West			

4. Please give a reason for your answers to Question 3.

I don't know much about some of the sites but Nastend which is currently residential and farm and natural habitat for birdslflowers is NOT part of "Stonehouse or Stroudwater Business Park" it is a separate discrete hamlet connected to Eastington in which parish it is. I know that the planning status is no longer agricultural/residential but it should not be a used for waste facility. The plan on the appendix re Nastend assumes a new road built from Stonehouse; when was this approved and what would it cost? Also Netheridge sewage works, if floodable areas are excluded from zone C why is this in? The Gloucester Railway lands urgently needed as "brownfield" residential and affordable housing.

4. Officer Response.

Number 99 Type CCLLR Name Anthony Blackburn Organisation GCC Councillor

With regard to Site 8, Nastend Farm, the Waste Planning Authority has carefully considered all the issues on this site. Since the site options consultation was undertaken in October 2009 and following discussions with the County Council as Waste Disposal Authority, there is significant uncertainty over the prospect of delivering a strategic waste management facility on this site. For this reason, it has been decided that this site will not be taken forward into the Publication WCS. In relation to the comments on Site 9, Netheridge Sewage Treatment Works, the redline area that was consulted on was not in the floodplain, but nearby areas are. The point is Zone C generally avoids the floodplain but there may be small areas of floodplain (e.g. near Netheridge) that encroach. Notwithstanding this, since the site options consultation was undertaken in October 2009 and following discussions with the landowner it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. For this reason, it has been decided that this site will not be taken forward into the publication WCS. In relation to Site 7, Land North of Railway Triangle, the site has not been taken forward into the publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the Publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward on any of the non allocated sites this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney	X		
3. Land at Lydney Industrial Estate, Lydney	X		

10. Please give a reason for your answers to Question 9.

I should have thought that the Lydney sites being accessible by water to take the residual waste away if necessary were a good idea-see comments re Sharpness/Berkeley

10. Officer Response.

Number 99 Type CCLLR Name Anthony Blackburn Organisation GCC Councillor

Comment noted. The potential for sustainable transport is acknowledged. Lydney Docks has significant potential but currently there are no barged freight movements. The straight line distance between Lydney Docks and Sharpness Docks is only about 1,700m. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. These site will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the sites forward as allocations at this stage does not mean that the sites are unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

13. Are you aware of any other sites that might be suitable for treating municipal waste?

Why not the old or used but not fully airfields e.g Aston Down, Kemble, Fairford, Little Rissington and South Cerney? Also Barracks - Hullavington? And as the flooding point has not been a factor as to a nuclear power station, the site of Berkeley Power Station being de-commissioned and disused docks at Sharpness exit by water for residues?

13. Officer Response.

Defence Estates were contacted in relation to land at Ashchurch, but indicated that they did not have any other land in Gloucestershire that was suitable for residual waste treatment.
The following sites may have at some time been an airfield and/ or under MOD ownership: Babdown Airfield (Site 012); Weston Industrial Estate/Honeybourne Airfield (Site 027); RAF Quedgeley (122/543) Javelin Park/Former Moreton Valence Airfield (Site 145); Old Moreton Valence Airfield (155/159/546); Former MOD Site 4, Hardwicke (203); Former MOD Site 2, Hardwicke (204/555); Former MOD Site 6, Hardwicke (205); The Park at Wingmoor Farm West (272); Ashville Business Park (296/560); Gloucester/Brockworth Business Park (243/297/559); Innsworth Technology Park (298/558); Waterwells Business Park (377/538); Green Farm Business Park (378/379/538); Olympus Park (380/381/537); Staverton Technology Park (423/562); Additional Land at Staverton Technology Park (424); Aston Down (433); Kemble Airfield (438); Upper Rissington Business Park (454); Anson Business Park (460) Please refer to Technical Evidence Paper WCS-N and its appendices for information on the above sites. Many of the above sites had technical assessments carried out on them and of those, the following parcels of land associated with old MOD land formed part of the consultation process: Javelin Park (Moreton Valence Airfield) The Park (Wingmoor West) Land adjacent to Quadrant Business Centre (Former MOD Site 2) Smiths (Old Moreton Valence Airfield) Berkley Power Station was initially investigated (ref Site 434) but this was found to fall outside of the 16km boundary from the fringe of the urban areas of Cheltenham and Gloucester and therefore no further assessment was carried out on the site. Please refer to Technical Evidence Paper WCS-N (Section 4 and Appendix A). The Sharpness Docks area did have some technical assessments carried out on it and two other parcels of land were submitted as part of the call for sites exercise. However, the landowners of the Sharpness Docks area (Site 547) indicated that the land was not available for residual waste management treatment and of the other parcels submitted one was in conflict with the landowners wishes and the other did not fulfil the 'inclusion criteria' outlined in Technical Evidence Paper WCS-N. For details of site 547 assessments please see Technical Evidence Paper WCS-N and its appendix C.89 and for the other parcels please refer to Technical Evidence Paper WCS-O (pages 30 and 31).

17. Do you have any comments on Section 3?

I don't subscribe to the 'Can't respond until you exclude incineration' lobby and we have to decide where the MBT facilities which I would prefer are going to go, but I think that the emphasis on large scale facilities is wrong, On p. 8 of the Consultation Document (Very good by the way) you ask for 'your views on whether we should be looking to incorporate residual municipal waste treatment into the potential urban extensions if and when they are brought forward' Answer; Yes, Yes, Yes! This is where many of the small scale facilities your exhibition mentions in Sweden, Germany etc arc, incorporated in housing and commercial developments and we should copy. I applaud the consultation and exhibition which I think fairly put the current 5 alternatives for waste disposal. I would have liked to see more cost information

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e.g. cost of incinerator, details of comparative running costs of UK and foreign systems etc. but no. Generally I hope that the Council keep an open mind as new technologies are coming forward every day and we do not want to be locked in to an expensive large scale old science or Toxic combustion technology for 25 plus years when we can by changing our mind set to smaller and cheaper more local solutions and favouring these deal with Gloucestershire's problems and take Gloucestershire's residents and businesses with us.

17. Officer Response.

Support for consultation document noted. In terms of technology, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. With regard to site size, the site options consultation identifies sites of at least 2 hectares in size. It should not be assumed that economies of scale mean an inflexible solution. GCC recognises that regardless of the type of solution proposed, it is important that the solution must be able to cope with changes in waste volumes and composition, as it is inevitable such changes will happen. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms.

Number 367 Type IND Name R Blake Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I wish to object to the proposed Waste Treatment Site extension at Area C Wingmoor Farm East Stoke Orchard for the following reasons. 1. There is already lots of heavy traffic going to and from Wing moor Farm and an extension to the facility would exacerbate the traffic problems in the Stoke Orchard area. 2. Bishops Cleeve and Stoke Orchard already have more than their fair share of waste and landfill sites and the area should not be burdened with more. 3. Some of the other proposed sites have much better access to motorways and major roads. 4. Cheltenham & District Clay Club already occupy the Area C site and the proposal makes no provision for the Clubs relocation. 5. The Cheltenham & District Clay Club has taken many years and lots of hard work and financial input to become the fine facility it now is. There is no other such clay-shooting club in the area. The club has developed and landscaped the area and planted over 400 trees to enhance the club grounds. This is not something that can easily be replaced.

17. Officer Response.

Comments noted. Dealing with each in turn. In terms of traffic, PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. For the Wingmoor Farm sites, the assessment highlighted a potential net increase in traffic and potential capacity issues in some locations which may require mitigation such as junction improvements. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. With regard to the use of existing facilities, the re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community. In terms of access, whilst other sites identified in the site options consultation are closer to the Strategic Road Network (SRN) the initial highway assessment for the Wingmoor sites is relatively positive subject to capacity improvements in certain locations. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the inclusion criteria for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from Tewkesbury Borough Council with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that this site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 106 Type IND Name Philip Booth Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I write to object to the use of all 13 of the sites listed below for possible waste treatment in Gloucestershire (i). I do not feel the questionnaire or information provided allows me to comment in the way I wish, so I trust you accept this as an objection. If not please let me know well before the closing deadline. I recognise that sites are urgently needed for waste treatment but it is hard to consider sites if we are unaware of what sort of facility or the size of the facility that could be on those sites. My key objection to all these sites is on the grounds that any of them could be used for a large incinerator. I do not consider that form of waste treatment suitable for any of the sites. Incineration creates toxic fly ash residue which has to be transported and landfilled increasing risks to watercourses and nearby residents. Incineration contracts will be for at many years, locking us into a 'solution' which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. I have no doubts that the long term costs to the taxpayer and the environment will be higher with incineration. Even if we maximise recycling to 80%, incinerators can act as a disincentive to reduce, reuse and recycle. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. I would be happy to consider that at a number of the sites you identify.

17. Officer Response.

Comments noted. The recognition that waste treatment sites are needed is noted. With regard to the type of facility and the concerns expressed relating to incineration, the Council is technology neutral the 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. With regard to size, the site options consultation is clear that the sites identified are at least 2 hectares in size and capable of accommodating a facility dealing with more than 50,000 tonnes of waste per year. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. Support for MBT recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes.

Number 129 Type IND Name James Bosomworth Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
3. Easter Park, Ashchurch		X	

4. Please give a reason for your answers to Question 3.

Thank you for the opportunity to be involved in this pre planning process. As a resident in saxon park, ashcurch, the persimmon homes estate completed 5 years ago I am shocked to discover that Easter Park, an urban /rural fringe site is even being considered as a suitable locality for waste disposal. Adjoining the steinhoff buildings, this proposal lies within only a few metres of the saxon park estate perimeter, and of course immediately adjoins Northway and Ashchurch, home to over 7000 residents. Aschurch Primary, one of the counties best schools, is only about 200 metres from this proposed site, as is northway playgroup, Ashchurch parish church, the M.O.D married quarters and barracks, not forgetting Northway infants school, Carrant brook primary,Tewkesbury School, and of course the thousands of homes present in this growing residential area. The scale/volume of waste processing required, hundreds of thousands of tonnes from the outset, will inevitably mean a vast increase in the heavy vehicle traffic on an already very busy, frequently congested road, the A46. The increase in this pollution alone, let alone the light, noise, smell, risk of hazardous contamination/ biohazard is entirely unacceptable. The shattering effect of this proposal on the vibrancy and vitality of Northway/ Ashchurch and indeed tewkesbury itself. The town is barely recovering from the flooding of 2007, let alone the credit crunch, and this proposal would weigh heavily on the many hard working families and thousands of children in its immediate environs. The loss of amenity and enjoyment for residents affected by road safety, light , sound , scent, bio/industrial waste pollution of this massive scale proposal are clearly entirely unacceptable and reveal a shocking lack of care for the thousands of people living right alongside this site. Clearly waste processing needs to occur, clearly it needs to take place in an isolated site eg Wingmoor farm landfill

4. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10 which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. Whilst there are residential properties to the north of the site, these are buffered to a large extent by existing employment uses. With regard to traffic, the site is well-located for Junction 9 of the M5 and the initial highway assessment carried out suggests the development of a waste facility may even represent a net decrease in traffic compared to the employment use that could be implemented under the current planning permission for the site. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. With regard to the potential for pollution, it should be noted that planning and pollution control regimes are separate but complimentary. Pollution control is concerned with preventing pollution whilst planning controls the development and use of land. Waste planning authorities are expected to work on the assumption that the relevant pollution control regime will be properly applied and enforced. PPS10 states that modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health. Odour, noise and dust are matters that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any 'sensitive receptors'. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning

Number 129 Type IND Name James Bosomworth Organisation not applicable/not provided

conditions. Notwithstanding the above, the site has not been taken forward into the publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 89 Type IND Name William Boughton Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
7. Land north of Railway Triangle, Gloucester		X	

17. Do you have any comments on Section 3?

The proposed erection of an incinerator on the Railway Triangle is regrettable and I urge you to reconsider this idea. Past decisions, hurriedly made, have destroyed much of our mediaeval and beautiful city. Now we are faced with the prospect of a multi-storeyed monstrosity obliterating the skyline and destroying our landscape. It is an outrageous to consider placing a vapour-belching incinerator close to an historical and wonderful cathedral. My opposition is not just a case of "not in my backyard", but I notice that the Cotswold Area itself has no fear of encroachment. Nevertheless it would have a deletrious effect on the value of my property. Surely, it would be more sensible and healthy to build this facility away from residential properties. Pedestrianisation, tree planting and truly remarkable flower displays have done much to enhance the centre of Gloucester. Please don't destroy the good work which has been done. An incinerator is not in the best interests of Gloucester citizens. Sir, I urge you to voice your protest at the abominable proposal.

17. Officer Response.

Comments noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. Notwithstanding the above, the site has not been taken forward into the publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the Publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations. The Council's preferred strategy is to focus the location of new strategic waste management facilities on the area defined as Zone C. This approach is considered to be consistent with national policy (PPS10) and the Regional Waste Strategy. Although the preferred focus for strategic waste management is Zone C, a number of other sites were identified outside this zone in the Forest of Dean and Cotswold District in order to provide suitable flexibility and support for the Zone C sites. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C.

Number 172 Type IND Name Ken Bradford Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Because now is not the time to tell me that I need to read page 24 of some hitherto unseen and unknown document. Any Questions are now a shot in the Dark. Maybe, if you post me the main consultation Document,I would be able to give my opinion on it.

2. Officer Response.

Comment noted. Copy of main consultation document provided to respondent in the post.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

Again,this is impossible to answer as I need to know what treatments are to be given the this End Waste. I do,however,feel that each district/borough should tend to it's own waste and if that means multiple treatment plants,then so be it. I don't agree with Incineration as an option. Burning Waste produces excessive CO2 among other undesirable products.

4. Officer Response.

Comment noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. In terms of having multiple sites in each District, the site options consultation identified sites in all Districts other than Cheltenham where no suitable sites were available. Views were invited on whether a combination of different sites should be utilised. At this stage no decision has been made on whether provision will be made on one site or several sites. The council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages

Number 172 Type IND Name Ken Bradford Organisation not applicable/not provided

of both single site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the county. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. The advantages and disadvantages would be investigated further during procurement process.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

6. Please give a reason for your answer to Question 5.

You've just biased the question by stating your objection to the RSS. Surely,this is a Public Consultation and your stance should be an impartial one.

6. Officer Response.

The County Council is on record as objecting to the RSS along with several other Gloucestershire local authorities. Stating this in the consultation paper does not preclude respondents expressing their own view on the relative merits of incorporating waste treatment facilities into the potential urban extensions to Gloucester and Cheltenham. Notably, there has been no interest from either waste operators or the potential developers of the urban extensions in providing this type of facility as part of the development. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I'm not sure/I don't know

8. Please give a reason for your answer to Question 7.

Again,it's the wrong time to tell me to read a document that I've not seen. I can only guess that you mean the exportation or importation of waste from outside the County and my answer would then be No.

8. Officer Response.

Comment noted. All consultation documents were made available on the County Council's website, at local libraries and District Council Offices and also on request. To clarify, identifying sites outside Zone C has nothing to do with importation / exportation of waste. The council endeavours to deliver a solution to manage Gloucestershire's residual waste, not waste from outside the county. To promote flexibility of the solution and further recycling above the minimum 60% target, the council would be open to views on the treatment of Gloucestershire's commercial waste. It is important to note that household waste is only 25% of the total waste produced by Gloucestershire.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester		X	
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

The roads at Foss Cross are not adequate and I feel that this site was mentioned as a smoke screen to prevent Waste Treatment Plants in the Cotswolds. If you were

Number 172 Type IND Name Ken Bradford Organisation not applicable/not provided

serious,Lechlade would be the choice or even the Quarries ty Cotswold Water Parks.

10. Officer Response.

Comments noted. PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. All of the 13 sites identified in the site options paper including Foss Cross were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. The Foss Cross site was identified from an initial long-list of 329 sites and found to be the only site in Cotswold District suitable and available. Although quarries have historically been associated with waste disposal (namely landfill), this consultation was to identify sites suitable for residual waste treatment, not landfill. Quarries do not fall within the inclusion criteria outlined in Technical Evidence paper WCS-N (with the exception of those quarries with existing waste management licenses). Importantly, Lechlade and the Cotswold Water Park fall outside of the 16km criteria for inclusion outlined in the above evidence paper. This approach is considered to be consistent with national policy (PPS10) and the Regional Waste Strategy. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. This site will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I'm not sure/I don't know

12. Please give a reason for your answer to Question 11.

Need I repeat that now is not the time to tell me to read a document?

12. Officer Response.

Comment noted. It is expected that most people will read the consultation paper before responding to the consultation. For ease of reference a short, 8-page summary paper was made available as part of the consultation package.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

Due to the lack of information here,I have to answer No. I do,however,know that Torfaen and Caerphilly District Councils take a significant whole lot more kerbside waste than Gloucestershire's Councils do and they don't burn it.

13. Officer Response.

Comment noted. As outlined in the previous response, at the present time, the Council is technology neutral.

14. Do you have any comments on the Executive Summary?

I'd like to see it first.

14. Officer Response.

Comment noted. All consultation documents were made available on the County Council's website and hard copies were available to view at all District Council offices and libraries throughout the County. A series of roadshows were also held allowing people to view documents and speak to Officers first hand.

20. Do you have any comments on the Habitat Regulations report?

Due to a total lack of information on the above reports and including the total lack of information on how to see them,i once again have to answer No. Do you

Number 172 Type IND Name Ken Bradford Organisation not applicable/not provided

suppose that it would be useful to warn the Public that they need to get these documents before reaching this Questionnaire?

20. Officer Response.

Comment noted. The HRA Screening Report was available with all the other consultation documents on the Council's website, at all District Council Offices and local libraries and on request.

Number 330 Type IND Name Ken Bradford Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

The entire county produces waste therefore the entire county should be part of the search for sites it is totally unfair to remove the cotswolds from having to have a waste disposal site(s)

2. Officer Response.

Comment noted. It is essential that the WCS provides a clear strategy setting out what will be built and where. This will provide certainty and confidence to the development industry and help bring proposals forward. The Council's preferred strategy is to focus the location of new strategic waste management facilities on the area defined as Zone C. This approach is considered to be consistent with national policy (PPS10) and the Regional Waste Strategy. Although the preferred focus for strategic waste management is Zone C, a number of other sites were identified outside this zone in the Forest of Dean and Cotswold District in order to provide suitable flexibility and support for the Zone C sites. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X		
4. Javelin Park, Haresfield		X	
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park	X		
9. Netheridge Sewage Treatment Works		X	
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

I've based my answers on a combination of road access, nearby population and existing sites

4. Officer Response.

Comment noted.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

6. Please give a reason for your answer to Question 5.

Number 330 Type IND Name Ken Bradford Organisation not applicable/not provided

I don't know what the RSS is

6. Officer Response.

RSS stands for Regional Spatial Strategy. The Government's intention to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I do not support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

see my answer to Q1. The entire county should be covered in sites therefore to support this would be to support restricting the search to zone c

8. Officer Response.

See previous response.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

this survey is biased and I can't answer questions that seem to have been avoided

10. Officer Response.

Comment noted. The 20 question survey was thorough and structured in order to enable quantitative comparisons to be made. A number of the questions provided a free-text opportunity to make any comment on the consultation that a respondent wished to make. Whilst the survey is based on the Council's preferred strategy of focusing strategic waste facilities in Zone C respondents were invited to disagree with this approach if they wished to. The survey was in no way biased.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

This is now becoming repetitive. try reading my previous answers

12. Officer Response.

See previous responses.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

I think the whole issue of waste management needs re thinking

13. Officer Response.

Comment noted.

14. Do you have any comments on the Executive Summary?

Number 330 Type IND Name Ken Bradford Organisation not applicable/not provided

I don't know what you're talking about

14. Officer Response.

Comment noted. The executive summary was a short (4 page) summary of the site options consultation paper. A copy of the document was provided to the respondent in the post.

15. Do you have any comments on Section 1?

ditto

15. Officer Response.

See previous response.

16. Do you have any comments on Section 2?

ditto

16. Officer Response.

See previous response.

17. Do you have any comments on Section 3?

ditto

17. Officer Response.

See previous response.

18. Do you have any comments on Section 4?

ditto

18. Officer Response.

The delivery and implementation section of the WCS is intended to provide a framework for monitoring the implementation of the policies and proposals contained in the WCS. It is a required component of Core Strategies specified in PPS12. It has been written as concisely and simply as possible.

19. Do you have any comments on the Sustainability Appraisal reports?

ditto

19. Officer Response.

See previous response.

20. Do you have any comments on the Habitat Regulations report?

ditto

20. Officer Response.

See previous response.

Number 194 Type IND Name Michael Brookes Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I'm not sure/I don't know

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X	X	
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West			

4. Please give a reason for your answers to Question 3.

Wingmoor Farm is already the location of a number of waste and recycling services it makes sense to have them located together. It is far enough away from any built up area to minimise, nuisance pollution i.e. noise, heavy traffic, smells from waste and the recycling processes. Easter Park is too close to a residential area which already suffers from its close proximity to a business park, it would be inconsiderate to locate a service which will attract heavy traffic and noise/smell pollution to residents. The proposal sites several incendary methods of recycling waste, in my opinion these should not be located close to residential accommodation.

4. Officer Response.

Support for Wingmoor Farm noted. The use of existing waste management facilities is consistent with national policy however, regard must be had to the cumulative effect of previous waste disposal facilities on the care and well being of the local community including any significant adverse impacts on environmental quality, social cohesion and inclusion or economic potential'. (PPS10). The sites identified in the site options consultation paper included a mix of sites, mainly previously developed land or land with planning permission for development. This included several sites that accommodate existing waste management operations including the Wingmoor Farm sites. In respect of Easter Park, clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. Notwithstanding the above, the site has not been taken forward into the publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty

Number 194 Type IND Name Michael Brookes Organisation not applicable/not provided

over the prospect of delivering a strategic waste management facility on this site. Furthermore the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

6. Please give a reason for your answer to Question 5.

I am not in possession of sufficient information to make a judgement on this.

6. Officer Response.

Comment noted. A separate evidence paper on the RSS proposals was produced in support of the site options consultation paper outlining the main housing and waste issues. Significantly, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

I think the use of external sites if they specialise in this kind of waste management should be considered.

8. Officer Response.

Support noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

I am not familiar with the sites in question

10. Officer Response.

Noted.

Number 194 Type IND Name Michael Brookes Organisation not applicable/not provided

11. Do you support the approach of using a combination of sites within and outside Zone C?

I'm not sure/I don't know

12. Please give a reason for your answer to Question 11.

I am not familiar with all the sites my main concern is that such facilities should not be located near or in residential areas, because of the detrimental affect it will have on the lives of those who live there. I believe that combining recycling sites with other forms of waste management has to be the best and most efficient use of land. and could help in the effectiveness of future recycling of existing land fill waste.

12. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should `provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, `with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the `proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. The use of existing waste management facilities is consistent with national policy however, regard must be had to the cumulative effect of previous waste disposal facilities on the care and well being of the local community including any significant adverse impacts on environmental quality, social cohesion and inclusion or economic potential. (PPS10). The sites identified in the site options consultation paper included a mix of sites, mainly previously developed land or land with planning permission for development. This included several sites that accommodate existing waste management operations.

Number 35 Type IND Name P Brown Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
3. Easter Park, Ashchurch		X	

4. Please give a reason for your answers to Question 3.

We are writing to voice our objection over the proposal to use Easter Park as a waste treatment site. We strongly object to this proposal and believe that this site is totally unsuitable for a waste treatment facility. The site is very closely situated to many residential homes on Saxon Park and also Northway, as well as being in the very close proximity to many business units and offices. Putting such a site so near to these residential properties could also have a huge effect on the value of these properties; not to mention the terrible smell it will create. It may also cause many homeowners to lose money with regards to house prices losing value due to a waste site being situated on their doorstep.

4. Officer Response.

Comments noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10 which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. Whilst there is residential development to the north of the site, this is largely buffered by a number of existing employment uses. In terms of property value, the effect of development, waste related or otherwise, on house prices, is outside the scope of the planning system. With regard to odour, this is a matter for the Council to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any sensitive receptors. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning conditions. Furthermore, modern waste management facilities tend to involve waste being delivered into an enclosed environment. The scope for odours to escape is therefore limited. It is different to landfill, which can obviously create some odour before the waste is covered. Notwithstanding the above, the site has not been taken forward into the publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 341 Type IND Name J C Brown Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

good access to motorway

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
3. Easter Park, Ashchurch			

4. Please give a reason for your answers to Question 3.

same as Q2

4. Officer Response.

Support for Easter Park noted. However, the site has not been taken forward into the Publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

7. Do you support the identification of sites outside Zone C?

I'm not sure/I don't know

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

13. Are you aware of any other sites that might be suitable for treating municipal waste?

Ashchurch Army Camp

13. Officer Response.

Number 341 Type IND Name J C Brown Organisation not applicable/not provided

Defence Estates were contacted in relation to land at Ashchurch, but indicated that they did not have any other land in Gloucestershire suitable for residual waste treatment.

Number 43 Type IND Name Keith Brushwood Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
2. Areas A, B & C at Wingmoor Farm West		X	

4. Please give a reason for your answers to Question 3.

I write to object to any proposal to use land at Wingmoor Farm, Stoke Orchard for the provision of additional waste disposal facilities. The reasons for my objection to the proposal are as follows: The nearby villages are already affected by the noise and damage created by heavy lorries and this will be significantly worsened by a further development of this type which can be avoided by locating it elsewhere. Road safety will be further compromised in the area by additional heavy transport travelling along local roads, particularly with regard to local schools and the young children and parents that use them. Part of the existing premises are used by Cheltenham Clay Club and it offers excellent facilities to members and visitors, there is no equivalent facility in the area. The club has been in existence for many years, and has an excellent record. I am a member of the Ambulance Service: and find the time I spend at the shooting club a tremendous help in relaxing. The site is not central to the county and will require the transport of material on journeys of many miles, hardly a sensible practice. I feel there must be several "more appropriate" sites for you to use and would ask you to consider those first.

4. Officer Response.

Comments noted. Dealing with each point in turn. PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by a further highway assessment with any necessary mitigation (e.g. junction improvements) clearly identified as site-specific requirements. The schools in the Bishop's Cleeve area do not appear to be located along the logical route that lorries would take to access the Wingmoor sites. However, should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. This should include matters such as lorry routeing and road safety issues. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the 'inclusion criteria' for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC Council with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the Waste Core Strategy later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that his site is taken forward as a formal strategic allocation for waste management in the WCS.

Number 175 Type IND Name Ian Bufton Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

It makes sense to have the strategic waste site near to the largest urban areas. C4 seems to be the most suitable positioned between Cheltenham, Gloucester and Stroud. However, other waste facilities will need to be available in The Forest and The Cotswolds.

2. Officer Response.

Support noted. The focus on Zone C is consistent with national and regional policy and has been taken forward into the Publication WCS. On balance having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. Speculative proposals may however come forward where there is market demand. Such proposals will be considered on their merits against relevant criteria.

Number 407 Type WOP Name Alan Bulpin Organisation Waste Recycling Group Ltd.

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Waste Recycling Group Ltd (WRG) support Gloucestershire County Council's approach to Location Strategy site selection. We consider the basis for Zone C assessment is consistent with National and Regional Policy. At a local level it is essential the preferred site has good communication links with the regional highway network, can be readily developed without adverse environmental impact and is unconstrained in land use planning terms.

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
4. Javelin Park, Haresfield	X		

4. Please give a reason for your answers to Question 3.

Of the sites identified within Zone C, WRG consider Site 4 at Javelin Business Park is the most suitable development opportunity to establish a sustainable waste management site for the following reasons: - The Javelin Park site is centrally located within the County close to junction 12 of the M5 along a defined advisory freight route. It is also well located in relation to the primary waste arisings from the principal urban areas of Gloucester and Cheltenham. - Javelin Park will be redevelopment of a brown-field site having the benefit of two modern standard highway accesses which are fully capable of handling the envisaged volume of HGV traffic. The southern most access would be solely for the Company's proposed waste treatment facility. - The northern access includes a slip road to the adjacent Garden Centre. Supplemental signage could be provided if necessary as required by the County Highway Authority. - The defined site is reasonably well screened by existing vegetation although significant supplemental landscaping would be provided as part of the detailed proposals. - The proximity of the M5 provides a continuous level of background noise. - Adequate street lighting between Junction 12 (M5) and the site entrance is currently provided along the B4008, which could be supplemented, subject to County Highways Authority requirements. - There are few residential properties within 500 metres of the site and environmental mitigation will be designed into the scheme to ensure all local residents are not adversely affected by the Company's waste treatment proposals. - Javelin Park is broadly level which will reduce the requirement for significant cut and fill operations. - Other than deliveries from local villages located east of the site, almost all other kerbside collection vehicles would gain access via the M5 or the A38. The B4008 from Junction 11 of the M5 could readily accommodate all traffic to and from Javelin Park.

4. Officer Response.

Support for Javelin Park noted. The site has been taken forward into the publication WCS because there is support from the landowners which greatly increases the prospects of delivery, the site is located close to Gloucester one of the county's main urban areas, the site enjoys good access to the strategic road network (SRN) is not at risk of flooding, has no other significant nearby environmental constraints and there are relatively few sensitive uses located nearby. Furthermore whilst the site is not currently in waste management use, it is previously developed (brownfield) land.

Number 14 Type IND Name - Bye Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I write to object to the use of all 13 of the sites listed for possible waste treatment in Gloucestershire, but especially the Javelin Park site on the grounds that: Any of these sites could be used for incineration, which I oppose. Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. The long term costs to the taxpayer will be higher with incineration. Incinerators act as a disincentive to reduce, reuse and recycle. The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. Large incinerators in other areas of the country are already deemed to be a mistake.

17. Officer Response.

Comments noted. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 15 Type IND Name - Bye Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I write to object to the use of all 13 of the sites listed for possible waste treatment in Gloucestershire, but especially the Javelin Park site on the grounds that: Any of these sites could be used for incineration, which I oppose. Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. The long term costs to the taxpayer will be higher with incineration. Incinerators act as a disincentive to reduce, reuse and recycle. The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. Large incinerators in other areas of the country are already deemed to be a mistake.

17. Officer Response.

Comments noted. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 169 Type IND Name Mr and Mrs Bye Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I write to object to the use of all 13 of the sites listed for possible waste treatment in Gloucestershire, but especially the Javelin Park site on the grounds that: Any of these sites could be used for incineration, which I oppose. Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. The long term costs to the taxpayer will be higher with incineration. Incinerators act as a disincentive to reduce, reuse and recycle. The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. Large incinerators in other areas of the country are already deemed to be a mistake.

17. Officer Response.

With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 114 Type IND Name Claire Calder Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
3. Easter Park, Ashchurch		X	

4. Please give a reason for your answers to Question 3.

Easter Park (Ashchurch) is unsuitable as a strategic waste site because of its close proximity to residential housing and local schools. We, as residents, don't want a waste site neighbouring our houses because of the potential for harm this may cause to our health and the health of our children. Having this facility will also bring the house prices down and give us prolonged cause for concern if there were ever a mechanical breakdown or a leakage of harmful emissions accidently.

4. Officer Response.

Comments noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10 which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. In terms of any health impact, PPS10 states that modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health. Furthermore, the detailed consideration of a waste process and the implications, if any, for human health is the responsibility of the pollution control authorities. PPS10 also states that, where concerns about health are raised, waste planning authorities should avoid carrying out their own detailed assessments rather they should ensure, through drawing from Government advice and research and consultation with the relevant health authorities and agencies, that they have any advice on implications for health. The WPA duly sought the advice from the PCT/NHS through the site options consultation. With regard to house prices, the effect of development, waste related or otherwise, on house prices, is outside the scope of the planning system. With regard to pollution it should be noted that planning and pollution control regimes are separate but complimentary. Pollution control is concerned with preventing pollution whilst planning controls the development and use of land. Waste planning authorities are expected to work on the assumption that the relevant pollution control regime will be properly applied and enforced. Notwithstanding the above, the site has not been taken forward into the publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 284 Type IND Name Alistair Cameron Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

I am opposed to the construction of an incinerator anywhere due to health reasons (release of dioxins into the atmosphere and creation of toxic waste including fly ash which may be stored at Wingmoor Farm), burning valuable resources which could be recycled or reused, and its negative impact on climate change. I am also concerned about the costs of being locked into a long, inflexible contract for an incinerator (eg for 25 years) which could be costly for the council tax payer. Instead the Council should produce a strategy based on reducing waste, recycling as much waste as possible (with a recycling target of 80% by 2020) and technologies such as Mechanical and Biological Treatment Plants and Anearobic Digestion. These technologies produce less greenhouse gases compared with an incinerator. Rather than constructing large waste facilities, smaller waste units should be provided so that local communities are responsible for dealing with their own waste. This would make the communities aware of the need to reduce waste and reduce the amount of waste transported across the county.

2. Officer Response.

Comments noted. Dealing with each in turn. Technology: At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. Contract Length: The contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Reduce, Re-Use, Recycle: The Council is actively promoting increased waste reduction, re-use and recycling. The recycling target of at least 60% by 2020 is 10% more than the national target of 50% over the same period. There will however always be an element of residual waste that cannot be recycled or composted and needs to be managed. Small-Scale Facilities: The site options consultation included sites in all Gloucestershire Districts/Boroughs other than Cheltenham (where no suitable sites were found to be available). Ten of these sites were located inside Zone C and 3 outside. Views were invited on whether a combination of sites should be used. At this stage it has not been determined whether treatment of residual waste will take place on one large site or several smaller sites. The council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch		X	

Number 284 Type IND Name Alistair Cameron Organisation not applicable/not provided

4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

1,2,10 Wingmoor Farm already has to accommodate an unacceptably large amount of waste operations and we should not be adding to this. The site is located near to a large residential area (Bishops Cleeve) and other villages such as Stoke Orchard, Elmstone Hardwick and Swindon Village. There are 2 primary schools and a secondary school in Bishops Cleeve and a primary school in Swindon Village. More waste operations would be detrimental to the health and well being of these residents and exacerbate the traffic problems on the local roads which are already congested due to the current waste operations. 3. Easter Park is located near to a large residential area (Northway) and Ashchurch Village. There are 3 primary schools in the area. Installing a waste operation near to such large residential areas would have a detrimental affect on the health and well being of the local residents, some of whom live very close to the site. A culvert runs through the site. There are areas of significant flood risk near to the site and during the 2007 floods areas such as Oak Drive and The Fairway flooded badly. The site is adjacent to the A46 which experiences heavy congestion and could not cope with the additional traffic associated with a waste treatment site.

4. Officer Response.

Comments noted. With regard to Wingmoor Farm, the re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community. In terms of proximity to Bishop's Cleeve and other settlements, clearly the provision of new waste management facilities in urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source and the urban areas of Gloucester and Cheltenham are where most of Gloucestershire's waste is generated. This approach is consistent with national policy in PPS10 which emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. With regard to health impact, PPS10, states that modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health. Furthermore, the detailed consideration of a waste process and the implications, if any, for human health is the responsibility of the pollution control authorities. PPS10 also states that, where concerns about health are raised, waste planning authorities should avoid carrying out their own detailed assessments, rather they should ensure, through drawing from Government advice and research and consultation with the relevant health authorities and agencies, that they have any advice on implications for health. The WPA duly sought the advice from the PCT/NHS through the site options consultation. In terms of transport, PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. With regard to Easter Park, clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and

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timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. Whilst there is residential development to the north of the site this is buffered by existing employment uses thereby reducing any direct impact. There are no schools within close proximity of the site (250m). In terms of health impact, PPS10 states that modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health. Furthermore, the detailed consideration of a waste process and the implications, if any, for human health is the responsibility of the pollution control authorities. PPS10 also states that where concerns about health are raised, waste planning authorities should avoid carrying out their own detailed assessments rather they should ensure, through drawing from Government advice and research and consultation with the relevant health authorities and agencies, that they have any advice on implications for health. The WPA duly sought the advice from the PCT/NHS through the site options consultation. The Council is aware that there is a culvert running through the site. This does not mean the site cannot be developed indeed it has planning permission for employment use. In terms of flood risk, the flood risk assessment carried out in support of the site options consultation shows that the site is in Flood Risk Zone 1 - Low Flood Risk. Any proposal of more than 1 hectare on this site would need to be supported by a site-specific Flood Risk Assessment (FRA). In terms of traffic impact, the initial highways assessment carried out on this site demonstrates that this site is suitable in highway terms and may in fact result in a net decrease in traffic compared with that generated by an employment use if the existing planning permission were to be implemented. Whilst the assessment flags up the issue of capacity at Junction 9 of the M5, this is a matter for detailed modelling through a Transport Assessment (TA) should a planning application come forward on this site. Notwithstanding the above, since the site options consultation was undertaken in October 2009 and following discussions with the landowner it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. For this reason, it has been decided that this site will not be taken forward into the Publication WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

6. Please give a reason for your answer to Question 5.

Smaller waste units should be provided so that local communities are responsible for dealing with their own waste. I am not keen on large waste facilities and certainly such facilities should not be near to residential areas.

6. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10 which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. Notwithstanding this, it is significant to note that the site options consultation has revealed little interest from either the waste industry or the

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developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, Government's intention to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

As already indicated, I would want to see smaller waste treatment facilities so that local communities are responsible for dealing with their own waste.

8. Officer Response.

Comment noted. PPS10 states that strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

These would be small scale facilities.

12. Officer Response.

Support noted. It is essential that the WCS provides a clear strategy setting out what will be built and where. This will provide certainty and confidence to the development industry and help bring proposals forward. The Council's preferred strategy is to focus the location of new strategic waste management facilities on the area defined as Zone C. This approach is considered to be consistent with national policy (PPS10) and the Regional Waste Strategy. Although the preferred focus for strategic waste management is Zone C, a number of other sites were identified outside this zone in the Forest of Dean and Cotswold District in order to provide suitable flexibility and support for the Zone C sites. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 284 Type IND Name Alistair Cameron Organisation not applicable/not provided

15. Do you have any comments on Section 1?

The County Council should set a target of recycling 80% of domestic waste by 2020.

15. Officer Response.

Comment noted. The County Council's target is to achieve at least 60% recycling and composting by 2020 with an aspiration for 70%. This is an ambitious target that exceeds the national target of 50% over the same period. However, even with effective recycling and composting initiatives there will always be an element of residual waste (i.e. the waste leftover after composting and recycling) that will need to be treated or disposed of.

Number 7 Type IND Name Claire Card Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
4. Javelin Park, Haresfield		X	

4. Please give a reason for your answers to Question 3.

I write to object to the use of Javelin Park, Haresfield for possible waste treatment in Gloucestershire on the grounds that: Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable; I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed; The long term costs to the taxpayer will be higher with incineration; Incinerators act as a disincentive to reduce, reuse and recycle; The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas; Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer; Large incinerators in other areas of the country are already deemed to be a mistake.

4. Officer Response.

With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 39 Type IND Name Nigel Card Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
4. Javelin Park, Haresfield		X	

4. Please give a reason for your answers to Question 3.

I write to object to the use of Javelin Park, Haresfield for possible waste treatment in Gloucestershire on the grounds that: Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable; I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed; The long term costs to the taxpayer will be higher with incineration; Incinerators act as a disincentive to reduce, reuse and recycle; The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas; Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer; Large incinerators in other areas of the country are already deemed to be a mistake.

4. Officer Response.

Comments noted. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 41 Type PC Name Tim Carter Organisation Teddington & Alstone Parish

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch		X	
4. Javelin Park, Haresfield		X	
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence		X	
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works		X	
10. The Park, Wingmoor Farm West	X	X	

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester		X	
2. Hurst Farm, Lydney		X	
3. Land at Lydney Industrial Estate, Lydney		X	

17. Do you have any comments on Section 3?

I write to object to the use of all 13 of the sites listed for possible waste treatment in Gloucestershire on the grounds that: Any of these sites could be used for incineration, which we strongly oppose. Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. The long term costs to the taxpayer will be higher with incineration. Incinerators act as a disincentive to reduce, reuse and recycle. The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. Large incinerators in other areas of the country are already deemed to be a mistake.

17. Officer Response.

Comments noted. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with

Number 41 Type PC Name Tim Carter Organisation Teddington & Alstone Parish

the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 224 Type IND Name Martin Casemore Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Why restrict your search to Zone C. We should be aiming for zero emissions for city area (cars, houses and especially waste which contains unknown toxins).

2. Officer Response.

It is essential that the WCS provides a clear steer on the preferred location for new waste management facilities. Zone C has been identified as the preferred location for a number of reasons which are clearly articulated within the site options consultation document including the fact that it avoids the floodplain and Cotswold Area of Outstanding Natural Beauty (AONB) is consistent with Government Policy (PPS10) and the Regional Waste Strategy and reflects the fact that Gloucester and Cheltenham are where most of Gloucestershire's waste is generated. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10 which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch		X	
4. Javelin Park, Haresfield		X	
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence		X	
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works		X	
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

Definitely not. The residual waste may contain toxins and unknowns. To agree to this you would need to provide more details of what you would be disposing of at such local level and how you would be dealing with it. I could guess that you would be burning it which is obviously wrong - so you should be more specific.

4. Officer Response.

Comment noted. As explained in the site options consultation paper, the 13 potential sites identified relate to the treatment of residual municipal (mainly household) waste. This is not hazardous rather it is the waste collected in black bags or similar. PPS10 states that 'modern, appropriately located, well-run and well-regulated,

Number 224 Type IND Name Martin Casemore Organisation not applicable/not provided

waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health. In terms of how the waste will be dealt with, at the present time the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10 which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

6. Please give a reason for your answer to Question 5.

These areas should be treated in the same way as the existing areas.

6. Officer Response.

Comment noted. The WCS has a role to play in ensuring all new development is underpinned by appropriate waste management infrastructure (e.g. recycling facilities). The site options consultation paper however focuses on identifying a site or sites suitable for accommodating a strategic waste management facility and there has been no interest from either waste operators or the developers leading the urban extensions in providing this type of facility as part of the development. Furthermore, the Government's intention to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

It depends on what your plans are for the main site versus the site outside the Zone C. Incineration, if this is being considered needs to be outside Zone C.

8. Officer Response.

Comments noted. In reference to the mention of an incinerator, at the present time the Council is technology neutral with no decision having been made on the technology or combination of technologies that will be used to treat Gloucestershire's residual municipal waste.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

What is the population density for these areas. Disposal of residual waste will always be unpopular. We should not be sending Gloucester rubbish to other urban areas and vice-versa.

Number 224 Type IND Name Martin Casemore Organisation not applicable/not provided

10. Officer Response.

Comment noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. These site will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the sites forward as allocations at this stage does not mean that the sites are unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

Seems the way to go but depends on detail.

12. Officer Response.

Support noted.

14. Do you have any comments on the Executive Summary?

Not yet.

14. Officer Response.

Noted.

15. Do you have any comments on Section 1?

Not yet

15. Officer Response.

Noted.

16. Do you have any comments on Section 2?

Not yet

16. Officer Response.

Noted.

17. Do you have any comments on Section 3?

Not yet

17. Officer Response.

Noted.

18. Do you have any comments on Section 4?

Not yet

18. Officer Response.

Noted.

19. Do you have any comments on the Sustainability Appraisal reports?

Not yet

19. Officer Response.

Number 224 Type IND Name Martin Casemore Organisation not applicable/not provided

Noted.

20. Do you have any comments on the Habitat Regulations report?

Not yet

20. Officer Response.

Noted.

Number 447 Type AGEN Name Neil Chapman Organisation Highways Agency

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

We provided broad support for Zone C during the Preferred Options Consultation that locates facilities within proximity to Cheltenham and Gloucester, which Gloucestershire County Council (GCC) has chosen to pursue.

2. Officer Response.

Support noted.

4. Please give a reason for your answers to Question 3.

Sites 1, 2 and 10: Wingmoor Farm East I West I The Park, Bishops Cleeve These sites are located in close proximity to each other therefore our comments apply to all sites. We would not hold any overriding objection to a waste facility(s) in this location, as this would serve both the Cheltenham and Bishops Cleeve areas with the potential to minimise use of the SRN. We would be particularly encouraged if there was potential for a new rail spur to serve Area C and thus reduce the need for the transport of waste via road freight, as this line links the site to Cheltenham, Gloucester and Tewkesbury. There could be an opportunity to use linked sites at Wingmoor Farm to maximise potential for the use of railway links, although the provision of a new spur and potentially a railway crossing, may render such a proposal unviable. However, if there was potential to achieve the transfer of waste via railway then this would be a proposal that would be strongly supported by the Agency and such a scheme could be bought forward on a larger scale with multiple facilities incorporated if the impact on the SRN were to be mitigated. Site 3: Easter Park, Ashchurch I Tewkesbury Industrial Estate This proposal is located on the A46 within close proximity to Junction 9 of the M5. We would be concerned that a waste facility in this location might generate a significant number of movements across Junction 9 for trips requiring access from Tewkesbury to the west, which is likely to be the area that this facility would predominantly serve. We therefore require a robust evidence base to demonstrate if there is an impact on the safe and efficient operation of Junction 9. We note that this location is the northernmost site identified within the document and is likely to serve the northern part of Gloucestershire. On this basis, the Agency acknowledges that in lieu of a facility in this location there may be a requirement for journeys of longer distances to transfer waste from Tewkesbury and its hinterland to facilities in the southern part of the district. This is not an approach encouraged by the Agency, who considers that waste facilities should be located in proximity to the populations that they serve. We would therefore encourage the provision of a facility in Tewkesbury but it should be reiterated that we have concerns about the proposed location, and would require an assessment of the transport implications on the SRN in line with the requirements of the GTA before a facility in this location could gain the Agency's support. We note the proximity of the site to Ashchurch Railway Station and would welcome any proposals to utilise the rail links for the transfer of waste. Such a strategy could help to alleviate our concerns regarding Junction 9 of the M5. Site 4: Javelin Park, Haresfield We have previously provided detailed comments to GCC regarding the location of a waste facility at Javelin Park. This involved a review of the transport evidence provided by Entec in relation to a proposed waste facility at this location. We advised that should a proposal come forward at this location, it must be supported by a robust Transport Assessment, in accordance with the GTA. We recognise that the site has outline permission for c.45,000 sqm of Use Class B8 warehouse and distribution floorspace and that several reserved matters applications have been permitted in pursuance of the outline consent. As a result of the Local Plan public inquiry in 2005 the Secretary of State concluded that support is provided by the development plan both for the current proposal (Use Class B8 storage and distribution) and for the use of the site as a waste management facility. It was noted by the Inspector, at the Gloucestershire Waste Local Plan inquiry, that GCC sought to establish that Javelin Park is the best of the strategic sites identified. It was also noted that the plan has a generous provision of sites in recognition of the fact that some of the safeguarded sites may not come forward because of development pressures. Javelin Park is identified as a preferred strategic site within the Waste Local Plan under 'The Former Moreton Valence Airfield' (Inset map 4). The Agency is concerned about the site's direct proximity to Junction 12 of the M5 and the impact that movements generated by a strategic waste facility in this location could have on the safe and efficient operation of the SRN. The location of the site is likely to attract significant numbers of heavy goods vehicle (HGV) movements in association with a waste operation, almost all of which will

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utilise the M5 from Stroud to the south and Gloucester to the north. We are currently in the process of designing a scheme to improve the performance of Junction 12, with plans to start work in 2010. Any development proposed in proximity to this location must mitigate the traffic impact, particularly at the peak times, to avoid exacerbating any existing difficulties. A robust travel plan should be produced in accordance with the DfT's 'Delivering Travel Plans through the Planning Process' (April 2009). Should any of the SRN require improvements as a result of a proposed development, these works will need to be funded by the developer. We acknowledge that funding has been secured for phase one improvements to Junction 12, which can accommodate Kingsway, Hunts Grove (phase one) and Gloucester Quays. Whilst the current B8 consents are implementable at Javelin Park a new application for a strategic waste facility would be required as this would not constitute a B8 use (waste facilities typically fall within a mix of Sui Genris and B2 Use Classes) and would therefore be subject to a full transport assessment and potentially a travel plan, incorporating the proposed developments in the locality and contributions commensurate to the impact on Junction 12 will be sought by the Agency. Site 5: Land adjacent to Quadrant Business Centre, Quedgeley This site is located off the A38, which links to Junction 12 of the M5 to the south. Whilst we would need to understand the impact of movements generated by the facility on Junction 12, we note that this site is within close proximity to an area identified for significant growth in the Regional Spatial Strategy (RSS) at Hunts Grove. We seek to encourage facilities that are in close proximity to the populations they serve. The location of a facility here could reduce the need for waste transfer from Gloucester to use the M5 and it will also be well placed to serve the growth proposals at Hunts Grove. However, a robust transport assessment would be required to identify the impact that a facility in this location will have on the SRN, in particular Junction 12 of the M5. We acknowledge that there are schemes identified to improve the performance of Junction 12, these are only partly committed. Should any of the SRN require improvements as a result of a proposed development, these works will need to be funded by the developer. The Agency acknowledges that funding has been secured for phase one improvements to Junction 12, which can accommodate Kingsway, Hunts Grove (phase one) and Gloucester Quays. The transport assessment for this site would need to incorporate these proposed developments and identify the impact that the facility would have on the operation of on the SRN, particularly Junction 12. If the assessment demonstrated a detrimental impact then we would seek contributions towards mitigating works. Site 6: Land at Moreton Valence We are concerned that this site is relatively isolated from any urban areas within the County and would therefore encourage vehicle journeys over a greater distance, which is contrary to the aims of Planning Policy Guidance 13: Transport (PPG13). We note that this site is likely to serve the Stroud and South Gloucestershire area. It is acknowledged that if no facility were to be provided in this area then this will result in longer journey distances for waste transfer serving the south of the County. We consider that site 8 (Nastend Farm) is in a sequentially preferable location to serve this area, as it is in closer proximity to Stroud. Site 7: Land north of Railway Triangle, Gloucester We encourage the location of strategic sites as close to the populations they serve as practicable. This site would locate a waste facility at the heart of the largest urban centre within Gloucestershire. Whilst the Agency is sympathetic to the environmental impact of locating the facility within the urban area we would be keen to promote such a location for a waste facility. We note the location of the facility adjacent to the railway line and would be highly supportive of any proposals which sought to utilise these rail links for the transfer of waste. The railway links all major urban areas in Gloucestershire and we consider that this asset should be fully utilised by the County Council to provider linked waste facilities across the county. Such an approach would provide significant sustainability benefits including reducing the carbon footprint of waste operations, reducing traffic congestion through the transfer of waste by HGV and improving air quality. We are aware that the provision of new railway spurs may require a fairly significant initial outlay, however, if these works mitigate the impact of development on the SRN then the Agency considers it reasonable to levy such funding through developer contributions. Site 8: Nastend Farm, Stroudwater Business Park, Stonehouse Due to the sites location near to Junction 13 of the M5 the Agency would need to understand the impact of a waste facility on the safe and efficient operation of the SRN through a full Transport Assessment. Whilst the site is within relative proximity to Junction 13 of the M5, we note that Stonehouse Railway Station is within approximately 1.5 km of the site. We would welcome the transfer of waste via rail freight as a measure to mitigate the impact of the development on Junction 13. We recommend the implementation of sustainable transport measures in preference to capacity improvement works at junctions to mitigate the impact of development on the SRN. Site 9: Netheridge Sewage Treatment Works, Gloucester Again we encourage the location of strategic sites as close to the populations they serve as practicable. This site would see the location of a facility to the western edge of the Gloucester built up area, which in principle would be supported by the Agency. We would need to understand where the majority of waste would be drawn from, and any impact that this may have on the SRN. We note

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the location of the site along the Gloucester to Sharpness Canal and would strongly support any proposals to utilise this link for the transfer of waste.
****Additional comments on the additional Moreton Valence Airfield consultation****
Thank you for the opportunity to comment on the Gloucestershire Waste Core Strategy (WCS) additional site consultation at Moreton Valence. The Agency has previously provided comments on the WCS site options document (October 2009), which included the subject site (Site 6). The consultation land represents an extension of the previously identified site. During the consultation period in October 2009 we raised concerns that the site is relatively isolated from any urban areas within the County and would therefore encourage vehicle journeys over a greater distance, contrary to the aims of Planning Policy Guidance 13: Transport (PPG13). We accept that the site is likely to serve Stroud and the South Gloucestershire area and that if there is not a facility to serve these areas, then waste would be travelling greater distances to the central and northern parts of the county to be processed. Whilst the southern part of the county is not well represented by sites, it was previously identified during site options consultation that site 8 (Nastend Farm) is sequentially preferable, as this site is closer to the urban area of Stroud. Due to the isolated nature of the site, the Agency would have concerns about the overall sustainability of additional waste facilities at this site. However, there are already existing waste facilities at the site and we recognise the benefit that linking waste facilities can have on the overall reduction of waste transfer. If a strategic waste facility on this site could identify the benefits of a linked waste processing operation (that would ultimately reduce the level of waste transfer required), then this would be an encouraging factor that could reduce the impact of vehicle movements and mitigate the isolated nature of the site. We suggest that any allocation at this site should therefore encourage linked facilities, which will reduce the overall number of waste transfers. Any such proposals would need to be supported by a full Transport Assessment to identify the benefits of a linked use. We note the text within the Proforma to identify that there are some congestion issues at A38/Cross Keys Roundabout. We support the recognition that an improvement scheme has been identified and that it would be necessary for any facility to contribute to future improvements here and also at M5 Junction 12. Any application would need to be assessed with a full Transport Assessment in line with the guidance identified within the DfTs Guidance on Transport Assessment document. In addition, any application should be accompanied by a staff Travel Plan.
Summary Whilst the Agency has supported the provision of sites in Zone C in principle, further information regarding the delivery of these sites is required. We understand that the market will dictate the delivery of allocated sites; however, we would seek a sequential approach to site selection seeking the delivery of sites that are best located to transfer waste in a way that minimises the need to travel long distances using road freight. If it can be demonstrated that linked facilities can reduce overall waste transfer miles, then the isolated nature of the site can be mitigated. If this cannot be demonstrated then the Agency would not be able to support additional development in this location. I reiterate that these comments do not prejudice any future responses on site specific matters and would request that we are consulted at an early stage on development sites that come forward. I look forward to our further involvement in the production of the Gloucestershire Waste Core Strategy.

4. Officer Response.

Comments noted. Dealing with each in turn. In principle support for Wingmoor East and The Park noted. The potential movement of waste by rail is acknowledged. The logistics of this would be explored through a Transport Assessment and Travel Plan, should a detailed proposal come forward on this site. The support in principle with regard to waste provision in Tewkesbury Borough is noted. With specific regard to Easter Park, it is important to note that this site already has planning permission for employment development. The principle of development in this location has already been accepted. The initial highway assessment carried out in support of the site options consultation identified a potential decrease in traffic compared to that which could be generated should the existing planning permission be implemented. Notwithstanding the above, since the site options consultation was undertaken in October 2009 and following discussions with the landowner it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. For this reason, it has been decided that this site will not be taken forward into the Publication WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations. In relation to Javelin Park, the need for a robust Transport Assessment is acknowledged. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Comments relating to potential

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impacts on Junction 12 noted. This issue would be explored in detail through a detailed Transport Assessment and Travel Plan with any necessary improvements secured through planning obligations as appropriate. Support in principle for Land adjacent to Quadrant Business Centre is noted. However, since the site options consultation was undertaken in October 2009 and following discussions with the landowner it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. For this reason, it has been decided that this site will not be taken forward into the Publication WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS national policy and any other material considerations. Moreton Valence comments noted. Whilst Moreton Valence is further from Gloucester than Land adjacent to Quadrant Business Centre and Javelin Park it is not considered to be 'isolated'. The site is located within 'Zone C' which has been drawn having regard to national and regional policy. It is also important to note that the site accommodates an existing waste management operation. Support for Land North of the Railway Triangle is noted. However, since the site options consultation was undertaken in October 2009, the Waste Planning Authority has carefully considered all the issues related to this site. Whilst it is fully recognised that it does currently serve a useful function as a site primarily handling construction and demolition waste, it will not be taken forward as a strategic site allocation due to highways and access issues. The site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Any waste proposals that come forward on this site will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations. With regard to Site 8, Nastend farm, the Waste Planning Authority has carefully considered all the issues on this site. Since the site options consultation was undertaken in October 2009 and following discussions with the County Council as Waste Disposal Authority, there is significant uncertainty over the prospect of delivering a strategic waste management facility on this site. For this reason, it has been decided that this site will not be taken forward into the publication WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS national policy and any other material considerations. The in principle support for Site 9, Netheridge Sewage Treatment Works is noted. Since the site options consultation was undertaken in October 2009 and following discussions with the landowner it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. For this reason, it has been decided that this site will not be taken forward into the publication WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS national policy and any other material considerations.
****Response to additional comments on the additional Moreton Valence Airfield consultation**** Please see above the officers response on the initial comments for the site at Moreton Valence Airfield. As stated within the respondents comments a full Transport Assessment would need to accompany any proposal for development.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

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6. Please give a reason for your answer to Question 5.

Other Potential Locations in Zone C The Agency would welcome the provision of residual municipal waste treatment facilities within proposed urban extensions if they are brought forward.

6. Officer Response.

Support noted. However, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

10. Please give a reason for your answers to Question 9.

Site 1(a): Foss Cross Industrial Estate, north of Cirencester This site appears to be significantly detached from any centres of population. We would not encourage a strategy that locates facilities away from the populations that they serve. However, if details of the operation were to identify that the site is unlikely to have a significant impact on the SRN and had operational benefits in serving this area of the region then we would not hold any overarching objections to this site being identified as a contingency site. Site 2(a) and 3(a), Lydney These sites are located within close proximity of each other; our comments are therefore applicable to both. The sites are a significant distance from the populations that they will serve, and on that basis, we would not encourage facilities in these locations. However, if details of the operation were to identify that the site is unlikely to have a significant impact on the SRN and had operational benefits in serving this area of the region then the Agency would not hold any overarching objections to this site being identified as a contingency site. It is further noted that a facility in this location could be best placed to serve the south west region of Gloucestershire, which is severed from the south east region by the River Severn. If it could be identified that such an approach would reduce the distance of waste transfer from the south west area of the County (i.e. that would otherwise need to go to Gloucester) then we would not hold any overarching objections to a facility in this location.

10. Officer Response.

Comments noted. Whilst the Council's preferred strategy is to provide strategic waste management facilities within Zone C, there is likely to be a role for sites outside this area e.g. smaller scale provision or supporting infrastructure e.g. waste transfer. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. These sites will therefore not be taken forward into the publication WCS. It should be noted that by not taking the sites forward as allocations at this stage does not mean that the sites are unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS national policy and any other material considerations.

17. Do you have any comments on Section 3?

Thank you for the opportunity to comment on the Gloucestershire Waste Core Strategy (WCS) Site Options Consultation. The Agency has previously provided comments on the WCS Issues and Options Document (August 2006) and Preferred Options (March 2008) and therefore the following comments should be read in conjunction with our previous representations. Circular 02/2007 'Planning and the Strategic Road Network' outlines the Agency's role in supporting the development of planning policy documents and its responsibilities for the national strategic road network (SRN). In assessing Local Development Framework (LDF) documents in Gloucestershire we need to be satisfied that any policy guidance takes account of the impact of development on the SRN. Given that our representations are lengthy we have provided them within a letter format, under the appropriate headings, I trust that this is acceptable. The Agency's general position is to support the provision of waste management facilities that make the most efficient use of previously developed land, meet sustainable transport objectives and minimise impacts on the SRN, This needs to be complemented by a policy framework that delivers infrastructure network improvements and, where appropriate, transport demand

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management measures, Any reliance on the national funding programme for SRN improvements will be highly uncertain, Therefore, all infrastructure improvements, traffic management or other mitigation measures relating to the SRN required in support of waste facilities will need to be funded by the developer and/or the Regional Funding Allocation process. The Waste Core Strategy must therefore provide the policy framework to ensure that future site allocations take the above factors into account and are also sound in terms of transport assessments which must be completed in accordance with the Department for Transport's (DfT) Circular 02/2007 and 'Guidance on Transport Assessment (GTA). The Agency welcomes the opportunity to provide further advice on such issues. We have provided site specific comments on the 13 sites identified by GCC. The Agency is unable to support a number of the sites that are in close proximity to the SRN without the provision of detailed transport assessments to identify the potential impact development on the safe and efficient operation on our network. We recommend that future site allocations and proposals for waste management facilities should be assessed in terms of their impact on the SRN and whether they reflect sustainable transport objectives and the guidance contained within PPG13, All proposals for site allocations in the LDF process need to be supported by a robust evidence base which will demonstrate and address any adverse impact on the SRN. Subsequently any planning applications for waste development should be accompanied by a transport assessment and travel plan carried out in accordance with the GTA. We acknowledge that GCC has identified a requirement to process 150,000 tonnes of residual household waste per annum, based upon achieving recycling 60% of the total waste generated. However, the Agency would like to seek clarification on the number of facilities that are likely to be allocated and the preferred locations. Whilst we have supported the provision of sites in Zone C in principle, further information regarding the delivery of these sites is required. We understand that the market will dictate the delivery of allocated sites; however, they would seek a sequential approach to site selection seeking the delivery of sites that are best located to transfer waste in a way that minimises the need to travel long distances using road freight. A potential way to achieve this could be the introduction of a phased approach to delivery, which identifies the best placed sites to service the populations they serve during the early stages of the plan with contingency sites identified to allow a flexible approach should the allocated sites not be delivered within this period. This is an approach that has been encouraged by the Agency for housing allocations for various authorities, which allows the sequentially preferably located sites to come forward initially but with contingency sites identified should these not be delivered in-line with their housing targets. If the Council were able to identify a forecasted annual requirement for each year to the period 2026, then these figures could be used to calculate the phasing and at which point the contingency sites could be promoted for delivery (should they be required). This approach will seek to ensure that the most suitable sites are delivered in preference to those which may be more commercially attractive to the market but will have greater environmental impacts on the surrounding area (i.e. greenfield out of centre locations), whilst retaining flexibility should the market not deliver the preferable sites or should the requirement for waste treatment exceed that anticipated, thereby requiring further facilities. We consider that greater emphasis could be given in the Core Strategy to maximising opportunities for transporting waste by rail or water, with many of the sites located adjacent to rail facilities. This is a strategy that we would encourage the council to investigate. The railway links all major urban areas in Gloucestershire and we consider that this asset should be fully utilised by GCC to provide linked waste facilities across the county. Such an approach would provide significant sustainability benefits including reducing the carbon footprint of waste operations, reducing traffic congestion through the transfer of waste by HGV and improving air quality. We are aware that the provision of new railway spurs may require a fairly significant initial outlay, however, if these works mitigate the impact of development on the SRN then we consider it reasonable to levy such funding through developer contributions. I reiterate that these comments do not prejudice any future responses on site specific matters and would request that we are consulted at an early stage on development sites that come forward. I look forward to our further involvement in the production of the Gloucestershire Waste Core Strategy.

17. Officer Response.

Comments noted. The comments concerning the importance of development impacting on the Strategic Road Network (SRN) are noted. The potential need for infrastructure network improvements and traffic management measures funded by development is noted. Also noted is the fact that the Agency is unable to support a number of sites in close proximity to the SRN without the provision of a detailed transport assessment. PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be

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supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. The Publication WCS will set out which strategic allocations have been taken forward from the site options consultation. The comments concerning a potential phased approach are noted and will be taken into consideration in preparing the WCS. Should it be considered necessary to adopt a phased approach to the release of any strategic site allocations this will be clearly set out in the WCS. The strategy does however need to be deliverable and it would be essential that such a phased approach would not prevent the development of waste management facilities coming forward. The importance of encouraging sustainable modes of transport is acknowledged. The Publication WCS will set out the Council's approach and where applicable any site-specific obligations. A key issue here however will of course be delivery. Whilst the potential for rail and canal links may exist clearly there will be major costs and potential logistical problems with developing sustainable transport infrastructure.

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4. Please give a reason for your answers to Question 3.

Sites 1 - 10 are located upon the solid geology of the Jurassic Lower Lias Mudstone. Having regard to our Groundwater Protection Policy (published in 2008), this geological setting is classified as a non aquifer with un productive strata. Therefore we consider that all of these sites present a low risk to groundwater. In addition, it is understood that these sites are all chosen as potential locations for waste treatment facilities, and are not potential locations of landfill sites. Therefore we would have no objection to these selected locations from a groundwater policy perspective, subject to the undertaking of the expected pollution prevention measures. (We recognise that there are existing landfill sites at some of the above locations - our comments relate to this current consultation.) Fluvial and Tidal Flood Risk In relation to Site 9 - Netheridge Sewage Treatment Works, Gloucester, the primary vehicular access route to the site is indicated to be partly located within flood zone 3. Alternative pedestrian access may be possible to the southwest. The Netheridge site is bounded to the east and north by an area of floodplain associated with the River Severn and other watercourses that drain into the Severn. Indeed the boundary of the site has been partially defined by the indicative floodplain. Uncertainty in the flood mapping and/or subsequent refinement of the floodplain through more detailed assessment may lead to a greater extent of the Sewage Treatment Works site being located within the floodplain and hence make the site less suitable within the sequential approach. In the case of Site 9 the proximity of a large area of floodplain adjacent to the site and considering that the site boundary has been defined by the current estimate of the floodplain extent, we consider the site to be less favourable. Again, more information would enable a better assessment of suitability of the site. In relation to Site 3a (Land at Lydney Industrial Estate) there is no dry access to the site in a 1 in 100 year fluvial and/or 1 in 200 year return period tidal flood event. Section 1.4.4, bullet point 3 of the Potential Waste Sites December 2008 document states: "for sites where the access and egress routes are within Flood Zone 3 or 2, the site should be considered as if being within that higher flood zone itself". At this stage, without more detailed information, and following the sequential approach, we consider both sites less favourable in terms of flood risk based on the lack of dry access. A lack of safe (preferentially dry) access may impact on both the operation of the sites and those working there. the provision of more detailed information about the risk of flooding to the access route(s) and/or details of proposed alterations to provide safe access would provide a better position from which to judge this site's suitability. This would be a matter to be addressed as part of site specific FRAs. Sites - general comments and specific additional biodiversity features We broadly agree with the Landscape Suitability assessment for all of the sites other than that for site 8 Nastend Farm, Stroudwater Business Park, Stonehouse, Stroud District which is described as having high Landscape Suitability. We consider the rural setting and natural topography and presence of biodiversity and landscape features to give it a low suitability score. A number of the assessments suggest a potential positive benefit for biodiversity. We would welcome further clarification of how this is arrived at (i.e. Is there an assumption that development will include landscaping?). We have identified some additional local environmental constraints in relation to the individual site that should be taken into account as above. 1. Areas A, B & C at Wingmoor Farm East, Tewkesbury Borough The Key Wildlife Site (Wingmoor Farm Meadow GWT Reserve) which is also a BAP priority habitat (Lowland Meadows) which borders Area C should be viewed as sensitive constraint which should not be safeguarded. 2. Areas A, B & C at Wingmoor Farm West, Tewkesbury Borough Additional environmental constraints: Area A Hyde brook runs along southern boundary and a ditch along the eastern boundary 3. Easter Park, Ashchurch/Tewkesbury Industrial Estate, Tewkesbury Borough Although there are no significant areas of biodiversity evident on the site a tributary of Tirle brook originates immediately south of southern boundary. This is in culvert under the site and it might be appropriate to divert this watercourse into an open feature away from the main waste disposal activities. This might have net flood risk benefits as well as biodiversity improvements. 4. Javelin Park, Haresfield, Stroud District Additional environmental constraints: A watercourse runs along the southern boundary partly open, partly in culvert; boundary hedges, scrub and some brownfield regeneration. 5. Land adjacent to Quadrant Business Centre, Quedgeley, Stroud District The aquifer fed/surface water/ flood water dependent site(s) over 1 km distant which could be affected if development design poses a risk to the water environment should be treated as a potential constraint. Additional environmental constraints: Tree lined Shorn brook abuts part of southern boundary 6. Land at Moreton Valence, Stroud District Additional environmental constraints: boundary hedges a ditch along the northern boundary and extension into Greenfield site. Abuts farmland to the south. 7. Land north of Railway Triangle, Gloucester Additional environmental constraints: Watercourse close to eastern boundary 8. Nastend Farm, Stroudwater Business Park, Stonehouse, Stroud District Although this is allocated for future employment use in the Stroud Local Plan we agree that there could be the potential for a significant negative effect on biodierversity. It is Greenfield site with a natural

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topography sloping to the stream on the southern boundary. It includes within site and boundary hedges an area of woodland as well as the watercourse. This watercourse has been compromised to some degree by the proximity of the industrial development on the southern bank but to date has maintained a meandering course Netheridge Sewage Treatment Works, Gloucester There are water voles recorded immediately adjacent to the site within and without the Netheridge nature reserve. They may be resilient to disturbance due to the sewage works, but should be considered. The river Severn is relatively close to this site. The Park, Wingmoor Farm West, Tewkesbury Borough The ecological assessment indicates that there should be no significant effects on biodiversity from a potential waste management facility. There is an industrial estate with existing waste management uses, close to a HRC and active landfill. In the centre of the site are 4 former RAF buildings / hangers.

****No additional comments to be added following additional Moreton Valence Consultation****

4. Officer Response.

General comments relating to groundwater and flood risk are noted. Comments on Site 1, Wingmoor Farm East are noted. The importance of safeguarding Wingmoor Farm Meadow is acknowledged and the presence of Hyde brook is noted. Comments in relation to Site 2, Wingmoor Farm West and Site 10, The Park are noted. In relation to Site 3, Easter Park, the Council is aware of the culvert under the site. The comment concerning potential diversion of this culvert is noted. Any proposal of more than 1 hectare in size would need to be supported by a site-specific Flood Risk Assessment (FRA) which would help to identify any necessary measures such as this. Notwithstanding the above, the site has not been taken forward into the publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). In relation to Site 4, Javelin Park, the comments on additional constraints are noted. The site has been taken forward into the Publication WCS because there is support from the landowners which greatly increases the prospects of delivery, the site is located close to Gloucester one of the county's main urban areas, the site enjoys good access to the strategic road network (SRN) is not at risk of flooding, has no other significant nearby environmental constraints and there are relatively few sensitive uses located nearby. Furthermore whilst the site is not currently in waste management use, it is previously developed (brownfield) land. In respect of Site 5, Land adjacent to Quadrant Business Park, the site has not been taken forward into the publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). In relation to Site 6, Land at Moreton Valence, the comments on additional environmental constraints are noted. Having regard to all of the issues raised and taking particular account of likely deliverability and the need to manage waste close to source, it has been decided to take this site forward as a strategic site allocation within the Publication WCS. The Council is not however convinced of the need to extend the site as suggested by the landowner in response to the site options consultation in 2009. The area allocated in the publication WCS is therefore the original site identified in the site options consultation in October 2009 and not the proposed site extension put forward in response to that consultation. This will allow for future operations to be more readily controlled than would be the case with a more extensive site. In relation to Site 8, Nastend Farm, it is important to note that the site is allocated for employment use in the Stroud District Local Plan. The principle of development in this location has already therefore been accepted. Notwithstanding the above the site has not been taken forward into the publication WCS because although the County Council is the landowner, following discussions with the County Council's Waste Disposal Authority (WDA) it would appear that there is significant uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore, the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). In relation to Site 9, Netheridge, the flood risk comments are noted and the presence of water voles is acknowledged. The site has not been taken forward into the publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore, the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide

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enough land to meet the potential capacity requirements to 2027). In relation to Sites 1a, Foss Cross, 2a, Hurst farm and 3a, Land at Lydney Industrial Estate, on balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. These sites will therefore not be taken forward into the Publication WCS. It should be noted that by not taking sites forward as an allocation at this stage does not mean that they are unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations. ****Response to additional comments on additional Moreton Valence Consultation****Please see officer comments on the earlier responses.

10. Please give a reason for your answers to Question 9.

The 2 Lydney sites are located in the superficial river terrace sand and gravel deposits, overlying the St.Maughans Devonian sandstone/mudstone formation. Having regard to our Groundwater Protection Policy, this geological setting is classified as a minor or secondary aquifer with locally important productive strata. Therefore we consider that these sites do present a risk to groundwater. However, it is understood that these sites are possible locations for waste treatment facilities and are not potential locations for landfill sites. Therefore we would have no objection to these selected locations from a groundwater policy perspective, subject to the undertaking of the expected pollution prevention measures. In relation to the Fosse Cross Site, it is sited over a Source Protection Zone 1 (SPZ1) for the public water supply abstraction at Baunton. Our Groundwater Protection Policy (policy P3-2 - Planning) states that: In SPZ1 we will object to proposals for new development of: incinerators; transfer stations; vehicle dismantlers and metal recyclers (scrap yards); waste treatment facilities; and normally all other non-landfill waste management activities that require a Waste Management Licence or PPC permit (EPR permit). We do not wish to see these activities close to water supplies intended for human consumption due to the inherent risks associated with their operation. The underlying Source Protection Zone may be protected by the presence of fuller earth clays which underlie this site. However unless we can be confident that the Source Protection Zone is isolated from the site, our general policy given above, would still apply. With regard the potential for contamination to be encountered at this site, we would highlight that we have requested investigation for contamination on a number of areas of this site. We therefore draw your attention to the matter of the Source Protection Zone 1 as a significant constraint to this site and potential show-stopper. It could limit the types of waste management facilities that could be located here and may require significant investigation into the underlying strata and the confidence of this as a reliable barrier to contamination. We understand from our discussions with you on this matter that there are limited options for sites in the Cirencester Area. We recommend you consider re-visiting other options or cross-boundary options (sites in Wiltshire or Oxfordshire for instance) or even consider re-opening the call for sites for this area to establish whether there are more sustainable options that the Fosse Cross Site. From our records of previous consultation with you on water quality, it was your intention to avoid choosing site locations on Source Protection Zones. (We comment on this approach and our support of it in our letter to you dated 16 February 2009, our reference 'Waste CS site study'). Therefore we would welcome further clarification on how water quality and protection was considered for the Fosse Cross site. The document does not provide much comment on this. 1a. Foss Cross Industrial Estate, Calmsden, Cotswold In relation to the Fosse Cross site we point out that it is adjacent to Fosse Cross Quarry Site of Special Scientific Interest (SSSI). This is a geological site and should not be negatively impacted by any waste management proposals or development. Natural England would have a lead role in commenting on this so we merely draw your attention to the matter. We also note you may wish to seek Natural England's views, or the County Ecologist's views, on Calmsden Railway Line where there is a local wildlife site (this is a grassland site - we wouldn't anticipate it would be impacted unless significant amounts of dust are created.) 2a Hurst Farm, Lydney Additional environmental constraints: boundary hedges a wooded ditch/spring. Green field site 3a Land at Lydney Industrial Estate, Lydney Additional environmental constraints: ditches

10. Officer Response.

Comments relating to Sites 2a and 3a noted including the additional environmental constraints that have been highlighted. In respect of Site 1a the concerns expressed in relation to the source protection zone are noted and will be taken into account along with other representations in deciding whether to take this site forward. The proximity of the SSSI is duly noted as is the potential impact on Calmsden Railway line. It is not considered appropriate at this stage to either re-open the call for sites exercise or to consider sites outside the County. On balance, having regard to all of the issues raised and the level of additional waste recovery

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capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. These sites will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the sites forward as allocations at this stage does not mean that the sites are unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

17. Do you have any comments on Section 3?

Thank you for consulting us on the Waste Core Strategy Site Options Consultation (October 2008) and the associated documents including the Habitats Regulation Assessment Screening Report and the Sustainability Appraisal. We have reviewed the documentation and provide the following comments. These are focused on the main consultation document and on the sites considered, and relate to the environmental matters within our remit. This letter is set out as follows: Firstly we have made some general comments on waste strategy and policy and how these relate to climate change. Next we comment on Groundwater protection - there is a key concern with the Fosse Cross site to note in this section. This is followed by the Flood Risk section where we make some important points and highlight issues for taking the sites forward that will need to be considered in particular by developers taking the sites forward. Next we comment on Ecological Protection where we mention some additional constraints/features and have some general comments for further consideration. Finally we make some general comment on our permitting role. Waste strategy and policy - climate change The Waste Core Strategy must be underpinned by a robust evidence base - a fundamental part of the evidence base for waste management is establishing the need and capacity for waste management facilities, which is a complex process that must be based on the best available information. The Core Strategy should seek to encourage waste management facilities which increase re-use, recycling and value/energy recovery, including through the use of new waste management technologies where appropriate. We support reducing the impact of waste developments on climate change. The Core Strategy should also consider the potential impact of climate change and mitigate against any negative impacts of and/or to waste developments. We believe that we need to create less waste, recycle more and maximise the use of residual waste in a safe and environmentally friendly way. It is important that GCC find affordable ways of managing municipal waste that cannot be recycled and maximise its use as a resource. With respect to prioritising the aims, PPS 10 recommends waste management should be considered alongside other spatial planning concerns such as transport, housing, economic growth, natural resources and regeneration, recognising the beneficial contribution that waste management can make to the development of sustainable communities, therefore the Core Strategy should seek to meet the aims in an integrated manner. Whilst regional self sufficiency should be an objective, flexibility could be incorporated to accommodate cross-boundary flows for treatment or disposal of specific waste streams where management facilities in other areas represent either the most appropriate method for treatment or disposal or represents the nearest appropriate facility - this would give consideration to the Best Practicable Environmental Option, the proximity principle and the waste hierarchy. Waste development plan documents should allocate specific sites for a range of types and size of waste management facilities, giving priority to safeguarding and expanding sites with existing waste management use and transport arrangements. Where appropriate, options for the treatment/disposal of waste should also: 1.be based on Best Practicable Environmental Options and the proximity principle and take into account socio-economic implications; 2.not stifle innovation or inhibit activities which direct management of waste up the waste management hierarchy; 3.be flexible to incorporate new technologies and regulatory requirements as they emerge in the future. Other factors to take into account are that economic conditions, changes in legislation, the market for recyclables and the potential impacts of climate change could impact on the amount of waste generated and the capacity needed to manage it. Such uncertainty requires an element of flexibility, not only in terms of provisions within the framework area but also in terms of any cross-boundary co-operation. The availability of waste management facilities can often be a positive incentive to many types of commercial and industrial development. Such benefits as materials exchanges, economies of scale in recycling and treatment can all stem from the integration of waste management facilities with other forms of development. It should also be recognised that sustainable waste management facilities can provide employment opportunities. Co-location of facilities with complementary activities is supported by PPS10. The Government's Waste Strategy for England 2007 says that 'recovering energy from waste which cannot sensibly be recycled is an essential component of a well-balanced energy policy.' It expects energy from waste to account for 25 per cent of municipal waste by 2020. we believe that recovering energy from waste can contribute to a balanced energy policy. We consider that it may be appropriate for local authorities to include energy from waste

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in their strategies and plans provided that: it does not undermine preventing or minimising waste, re-use, recycling or composting; it forms part of a properly considered and appraised regional or local strategy. it is consistent with the statutory aim to establish an integrated and adequate network of waste disposal installations and enable waste to be disposed of in one of the nearest appropriate installations. We also consider that energy generated by incineration should be recovered as far as practicable, for example using Combined Heat and Power (CHP) schemes, consistent with the requirements of Best Available Techniques. See: http://www.environment-agency.gov.uk/business/topics/waste/103220.aspx for more details. GCC should also take into account the following DEFRA guidance: http://www.defra.gov.uk/environment/waste/localauth/planning/documents/infosheet12.pdf
http://www.defra.gov.uk/environment/waste/localauth/planning/documents/infosheet11.pdf We also recommend that alternative transportation options in addition to roads are considered as part of the strategy. In Gloucestershire the use of railway and canals are both particular options that should be capitalised if found to be more sustainable. Both the Easter Park and Wingmoor sites could potentially make use of the railway network. And the canal network in Gloucester and Stroud in particular may be beneficial. Flood Risk Assessment of flood risk The document makes reference to a Level 2 Strategic Flood Risk Assessment (SFRA). From our discussions and previous liaison with you we know that you are referring to the Strategic Flood Risk Assessment - Initial Site Assessments - Potential Waste Sites document dated December 2008. We would like to point out that level 2 SFRAs are generally considered to be those which make a detailed assessment of flood risk to areas or individual sites. (See Chapter 3 of the PPS25 Practice Guide for further information.) Therefore the December 2008 initial site assessment document is not a Level 2 SFRA. We request that the referencing be amended in the document and any future documentation to avoid confusion. Please note this is an important point as this has already been raised as a query by another consultant and it is important that developers, planners and members of the public are not mis-lead about the work that has been undertaken. We would remind you that we fully support the assessment work you have undertaken on flood risk, and the approach of selecting sites outside of flood risk locations in accordance with the December 2008 site assessment report and the original Gloucestershire Level 1 SFRA. As you have selected sites in accordance with this we do not consider that there is a need for you to undertake Level 2 SFRAs - rather the role of making site-specific Flood Risk Assessments would fall to developers as part of planning applications. This is in accordance with PPS 25. Our letter to you dated 16 February 2009, our reference 'Waste CS site study' also makes this clear. We therefore consider the request to remove the reference to 'Level 2 SFRA' is reasonable and justified, and we request you confirm to us that you will do this. Most sites are likely to require a site specific Flood Risk Assessment (FRA), and we reaffirm our recommendation from our previous correspondence that FRAs be undertaken by developers at any sites where watercourses are present (including where they bound the site). Site specific FRAs may identify flood risk/watercourse site constraints will have to be taken into consideration when undertaking detailed site design. The majority of sites have watercourses located in close proximity. We have not mapped some of the smaller watercourses, and they may therefore have floodplain areas that infringe on the sites. Flood maps we have produced for watercourses should be considered indicative only, and subject to revision/refinement through more detailed analysis. This is particularly relevant to smaller watercourses where the mapping is generally less accurate. At this stage we note that firm proposals for the 13 preferred sites have not been made. Within the sequential approach the flood risk vulnerability of the development should be taken into consideration. If sites where some flood risk has been identified must be used then a 'less vulnerable' type development should be pursued in preference to a 'more vulnerable'. PPS25 table D.2 classifies waste treatment facilities as 'less vulnerable' except for where hazardous waste is handled, in which case the site's classification should be 'more vulnerable'. Landfill sites and other sites handling landfill waste should be treated as 'more vulnerable'. Taking the 13 sites forward - general flood risk considerations The 13 short listed sites, as identified by the Waste Core Strategy - Site Options Consultation (WCS-SOC) document, are indicated to have a low risk of flooding, being located substantially or wholly within flood zone 1. We welcome the dismissal of sites substantially located within flood zones 2 and 3. This is in accordance with the principles of in Planning Policy Statement 25: Development and Flood Risk (PPS25). We consider that based on the presently available information none of the sites should be dismissed on the grounds of flood risk. However, at this stage of the process further assessment of the suitability of the sites in respect of flood risk would be beneficial, acknowledging that PPS25 requires all forms of flooding be taken into consideration, and also acknowledging that our flood map flood risk zones are indicative and do not include all minor watercourses. We note that the Waste Core Strategy - Site Options Consultation document largely makes reference to the flood zonation of the sites without further commenting on other potential flood risk issues or the presence of minor watercourses. These matters would need to be fully assessed as part

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of site specific FRAs for plannign applications. Other sources of flooding Surface water flooding is a key consideration for the detailed stage. We have produced maps for Areas Susceptible to Surface Water Flooding that have been issued to Local Authorities' Local Resilience Forums. Whilst these do not have a high level of accuracy they may be of interest. We can provide further information on this if desired at this stage. Ecological Protection We welcome the references to SSSIs, County Wildlife Sites and BAP species and habitats in the site appraisals/summaries for each site. There would be merit in including more information on other local ecological features in the section on Biodiversity/Ecology. We consider further emphasis on hydrology and the water environment, other than the flood risk focus, would improve the document. It is important that wildlife corridors or networks of even relatively common habitats should not be compromised. If they are not referred to at this stage it could be taken to mean that they did not represent environmental constraints, even if they are afforded some protection in local plans and policies. By virtue of the selection process to date many of the sites are not rich in ecological features however a summary of habitats within or adjoining the sites may help with a comparative evaluation of the relative impacts or sustainability of sites and will certainly help inform future planning permissions. Many or these are likely to be relatively widespread features: hedgerows, scrub, trees, semi-improved grassland, ponds and watercourses however some may be of County, District, Parish or Local significance and may even contain unrecorded BAP species. Watercourses are a particularly pertinent example of this - many of those close to the sites support eels and otters both being BAP species. It is quite likely that any specific waste planning proposals on such sites can still safeguard such features and impacts on local biodiversity could be mitigated by site design and a comprehensive site constraints plan produced sufficiently early so as to modify land sale prices however they are part of the wider natural capital and fabric of the natural landscape and need due consideration. For some of the sites notably site 8 the developable area will be significantly reduced if biodiversity obligations are fulfilled. On the more impoverished sites some environmental enhancements will be possible. On some of the brownfield sites such as 3, 4, 5 and 7 there is an opportunity to create, for example a wider naturalised green corridor along the boundary watercourses. In addition it is important that the sustainability of any new installation maximises opportunities for SUDS to enhance biodiversity. Environment Agency Regulation and Permitting A number of the sites highlighted within the document are regulated by us under the Environmental Permitting Regulations 2008. These sites are separately permitted to undertake a range of waste management activities including the disposal of waste by landfill at Wingmoor Farm area and the transfer and treatment of waste at a number of other sites. The permits currently in force may be varied, by application, to include additional waste management activities. Any new waste management facility will also require a permit from us. New facilities would require relevant planning permission to be in force before a permit could be issued. Details of our position regarding a range of waste facility types, including landfills and Energy form Waste Facilities and the application procedure are detailed on our web site.

17. Officer Response.

Comments noted. Dealing with each in turn. In terms of general policy, the importance of addressing climate change within the WCS is fully acknowledged. This will be a key theme of the Publication WCS. The comments concerning the application of the best practical environmental option (BPEO) is noted. The need to demonstrate that a proposal was the BPEO for waste planning was introduced in PPG10. This document has since been replaced by PPS10 which no longer requires proposals to demonstrate BPEO. The importance of recovering energy from waste is fully acknowledged. The heat and power that can be gained from a waste facility offers a real benefit environmentally by reducing our reliance on fossil fuels and creates a potential income of several million pounds per annum for the council. Energy recovery (in the form or electricity and/or heat) will be dealt with under Solution Performance and guarantees provided by contractors and throughout the procurement process. The importance of alternative modes of transport is acknowledged. PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. A number of the sites identified offer potential for movement of both construction materials and waste by water and rail. In respect of groundwater issues, the comments concerning sites 1-10 (no objection) are noted. Comments for sites 11 and 12 noted. The proposals do not relate to landfill. Comments relating to Foss Cross noted. Having regard to forecast capacity requirements (i.e. the number of sites

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needed) and the need to manage waste close to source in line with national policy, it has been decided not to allocate any strategic sites outside the area referred to as Zone C (the central area of Gloucestershire). As this site is outside Zone C it is not being taken forward. Also, the lack of waste industry interest in response to this site through the site options consultation (2009) raises question marks over the deliverability of the site for waste management purposes. Furthermore, the Environment Agency (EA) has raised concerns in response to this site in relation to groundwater issues. In respect of the comment concerning the identification of sites outside Gloucestershire, this approach is not considered appropriate. In the interests of the proximity principle, the focus of the WCS is on identifying suitable sites within Gloucestershire. The comments concerning the status of the flood risk assessment undertaken are noted. It is accepted that the assessment undertaken is not a Level 2 Strategic Flood Risk Assessment (SFRA). Any further reference to the assessment will be revised accordingly. It is noted that a full Level 2 SFRA is not required as sites have been selected having regard to the Level 1 SFRA previously carried out. The need for a Flood Risk Assessment (FRA) to be produced by developers is acknowledged. This will be specified as a policy requirement for any strategic site allocation made in the Publication WCS. The offer of additional information concerning surface water flooding is welcomed. With regard to ecology, the site schedules contained in the site options consultation paper highlight the most important features. Any other more localised features of interest in ecological and hydrological terms will be identified and addressed through an Environmental Impact Assessment (EIA) or other assessment produced in support of a detailed proposal should one come forward. Opportunities for enhancement will be identified as appropriate. The 'no comment' on the Habitat Regulations report is noted. The role of the EA in regulating and permitting waste management facilities is also noted. The responsibility for ensuring both planning permission and licensing is in place lies with the developer. The need for an EA waste management license and the role of the EA will be explained in the Publication WCS.

20. Do you have any comments on the Habitat Regulations report?

We have no particular issues with the Habitats Regulations Assessment documentation.

20. Officer Response.

Support noted.

Number 16 Type IND Name I Clarke Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
2. Areas A, B & C at Wingmoor Farm West		X	

4. Please give a reason for your answers to Question 3.

Ref :Development of Wingmoor Farm West Tewksbury Borough. As Documented in your (Waste core strategy site options consultations paper). I wish to put forward my objection to the proposed further development of sites at Wingmoor Farm West Tewksbury Borough 1. The area will suffer from a significant increase in traffic. with an impact on stoke orchard village 2. Also your above document states the area is in the green belt Between Gloucester and Cheltenham. 3. Other sites listed have better access to major road links 4. Cheltenham and district gun club occupy one site listed with no Provision for its continuation if land is used

4. Officer Response.

Comments noted. Dealing with each in turn. PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. For the Wingmoor sites, potential capacity issues were flagged up which are likely to necessitate mitigation such as junction improvements. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. Whilst it is acknowledged that the Green Belt should generally be protected, PPS10, emphasises that local authorities should 'recognise the particular locational needs of some types of waste management facilities when defining detailed green belt boundaries and, in determining planning applications'. In line with PPS10 companion guidance, should any sites within the Green Belt be specifically allocated within the WCS, it will need to be clearly indicated that they are for waste management purposes only. It is acknowledged that other sites identified in the site options consultation paper such as Javelin Park and Easter Park enjoy better access to the Strategic Road Network (SRN) however the initial highway assessment carried out for the Wingmoor Farm sites suggests that, although there will be a net increase in traffic, capacity could be improved through mitigation in appropriate locations such as junction improvements etc. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the 'inclusion criteria' for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that his site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 92 Type PC Name Pauline Clarke Organisation Tewkesbury Town Council

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Whilst understanding your thoughts regarding the area as zone C, we believe that smaller sites should be created in different locations thus spreading the problem more evenly. Also, you have not specified exactly how many sites you require. A combination if sites within and outside zone C preferred

2. Officer Response.

Comment noted. Zone C includes Gloucester and Cheltenham which is where most of Gloucestershire's waste is generated. This will ensure that this waste is able to be treated close to source thereby minimising transport requirements. In terms of a network of small, local facilities the site options consultation paper identifies 13 potential sites, 10 within Zone C, 3 outside Zone C. Views are invited on using a combination of different sites. The consultation makes it clear that whilst some of the sites are capable of providing a one-site solution, it may be that strategic waste management of municipal waste comes forward on several different sites. The council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. In terms of the number of sites required, at this stage this is unknown. All sites identified in the consultation paper are capable of accommodating a facility managing 150,000 tonnes of waste each year. Assuming an overall requirement to treat 150,000 tonnes, this could be one site dealing with 150,000 or three sites dealing with 50,000 each. This is explained in the consultation paper. The Publication WCS will identify enough sites to provide flexibility and contingency whilst meeting the overall capacity requirement.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X	X	
4. Javelin Park, Haresfield		X	
5. Land adjacent to Quadrant Business Centre	X		
6. Land at Moreton Valence		X	
7. Land north of Railway Triangle, Gloucester	X		
8. Nastend Farm, Stroudwater Business Park	X		
9. Netheridge Sewage Treatment Works		X	
10. The Park, Wingmoor Farm West			

4. Please give a reason for your answers to Question 3.

Areas 1,2,and 10 are all areas that already have waste sites located near to them and would therefore make the transition easier. Area 5 is far enough from the flood zone area not to have a dramatic effect. Areas 4,6 and 9 appear too close to the flood zone and may have a disasterous impact to the plants ability to operate under water. Area 3 although located within an industrial area by its size, appearence and location would have a serious impact on traffic, visibility and local residents.

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Area 7 & 8 seem ideally located, close enough to the motorway but outside residential areas.

4. Officer Response.

Support for Wingmoor Farm sites noted. The use of existing waste management facilities is consistent with national policy however, regard must be had to the cumulative effect of previous waste disposal facilities on the care and well being of the local community including any significant adverse impacts on environmental quality, social cohesion and inclusion or economic potential. (PPS10). Support for Quadrant Business Centre noted. The Strategic Flood Risk Assessment (SFRA) carried out demonstrates that this site is not at risk from flooding. Any proposal of more than 1 hectare would however need to be supported by a detailed Flood Risk Assessment (FRA). In terms of flood risk at sites 4 (Javelin Park) 6 (Moreton Valence) and 9 (Netheridge) the SFRA indicates that there are no flooding issues associated with sites 4 and 6 whilst the boundary of site 9 has been drawn to exclude those parts of the wider site that may be subject to flooding. Further work on flood risk matters may be required and the WPA is aware of the fact that the vehicular access route to the site is potentially vulnerable, being located within Flood Zone 3. On all of the sites, any development proposal of more than 1 hectare would need to be supported by a detailed FRA. Site 3 - Easter Park. In terms of traffic impact the initial highway assessment carried out for this site suggests that a waste facility could actually lead to a net reduction in traffic, compared with that which could be generated if the existing planning permission for employment development were to be implemented. Any strategic site allocation made in the publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. In terms of visibility, a modern waste management facility is very similar in appearance to an industrial use and would therefore not be too different from that which could come forward under the existing planning permission for this site. In any case, the detailed design of the building/s would be subject to negotiation through the planning application process, should a detailed proposal come forward. Although there are residential properties located to the north of the site these are buffered to a large extent by existing employment uses. It is also pertinent to note that the companion guide to PPS10 states that, 'with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development'. Notwithstanding the above, the site has not been taken forward into the Publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations. Support for sites 7 and 8 (land north of railway triangle and Nastend Farm) noted.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Disagree

6. Please give a reason for your answer to Question 5.

When setting up urban extensions this should have been thought about before identifing the areas to be built up.

6. Officer Response.

Comment noted. The integration of waste management facilities into the urban extensions would allow waste from these developments and the wider Gloucester and Cheltenham area to be treated close to source in line with national and regional policy. However, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the

Number 92 Type PC Name Pauline Clarke Organisation Tewkesbury Town Council

general policies and requirements of the Publication WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

It seems logical that waste disposal should be distributed evenly over the county.

8. Officer Response.

Support for dispersed approach noted. The site options consultation identifies 13 sites including 10 in Zone C and 3 outside. Sites were identified in all Districts with the exception of Cheltenham Borough where no suitable sites were available. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney		X	
3. Land at Lydney Industrial Estate, Lydney		X	

10. Please give a reason for your answers to Question 9.

Area 1a will improve the ability to cover other villages and towns. Areas 2a and 3a are too close to the flood zones.

10. Officer Response.

Support for Site 1a noted. In respect of flooding at Site 2a, notably the Strategic Flood Risk Assessment (SFRA) undertaken shows that the site is fully within Flood Zone 1 and is therefore at low risk of flooding. For Site 3a, the SFRA Level 2 indicates that the majority of this site is not at major risk of flooding, but the access road (Harbour Road) and the far north west corner is in the functional floodplain i.e. Flood Zone 3b. This would be a matter for a site-specific Flood Risk Assessment (FRA) which would be required if a detailed proposal were to come forward on this site. Notwithstanding the above, having regard to forecast capacity requirements (i.e. the number of sites needed) and the need to manage waste close to source in line with national policy, it has been decided not to allocate any strategic sites outside the area referred to as Zone C (the central area of Gloucestershire). It should be noted that existing facilities for waste management are present on the site and their contribution to the County's waste network is recognised. Although the site has not been formally allocated in the Publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

Evenly distribute the waste, we all have a duty of care. This would put the onus on all.

12. Officer Response.

Support noted.

Number 92 Type PC Name Pauline Clarke Organisation Tewkesbury Town Council

13. Are you aware of any other sites that might be suitable for treating municipal waste?

Unable to comment as we have insufficient knowledge of other areas.

13. Officer Response.

Noted.

14. Do you have any comments on the Executive Summary?

Good overview of why decisions need to take place, clear precise information of details, plans and reasoning.

14. Officer Response.

Support noted.

15. Do you have any comments on Section 1?

No

15. Officer Response.

Noted.

16. Do you have any comments on Section 2?

Obviously well needed due to the society we now live in with regards to convenience foods and disposible products.

16. Officer Response.

Comment noted.

17. Do you have any comments on Section 3?

Why were sites at Cirencester, Coleford, Stroud and Lydney discounted from the list of proposed sites?

17. Officer Response.

The site options consultation included two sites at Lydney; land at Lydney Industrial Estate and land at Hurst Farm, Lydney. Sites at Coleford and Stroud were considered in the initial 'long-list' of 329 sites but ruled out for a number of reasons including site size, location, flood risk, highways, availability etc. Cirencester is further than 16km from Gloucester and Cheltenham -thereby falling outside the definition of 'within close proximity' set out in the RSS. Further information on the site-selection process is set out in Technical Evidence Paper N: Site Selection.

19. Do you have any comments on the Sustainability Appraisal reports?

No

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

Have not seen this document.

20. Officer Response.

Noted.

Number 280 Type WOP Name J Clay Organisation Agricultural Supplies Co

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

I belive there should be more waste treatment within the south cotswolds area

2. Officer Response.

Comment noted. The site options consultation paper included one site in Cotswold District -Foss Cross Industrial Estate. Other sites in Cotswold District were considered during the site selection process but not taken forward for various reasons including highway constraints, flood risk, deliverability and site size. Significantly much of the south Cotswolds area is remote from Gloucester and Cheltenham which is where most of the County's waste is generated. Identifying strategic site allocations here would be contrary to national and regional policy including PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations and the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced).

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X	X	
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence		X	
7. Land north of Railway Triangle, Gloucester	X		
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West			

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Agree

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester		X	
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

11. Do you support the approach of using a combination of sites within and outside Zone C?

I'm not sure/I don't know

Number 280 Type WOP Name J Clay Organisation Agricultural Supplies Co

18. Do you have any comments on Section 4?

All i can see is huge problems with nimbys wherever a site is discussed

18. Officer Response.

Comment noted. It is acknowledged that the provision of waste management facilities can be controversial and will often generate local interest and in some cases, opposition. The issue of delivery and implementation covers a broad range of issues not just the views and actions of neighbouring properties and it is essential that the WCS sets out a robust delivery framework identifying who will deliver the WCS policies and proposals, when and how.

Number 9 Type IND Name Terry Clinton Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

I write to lodge my objection to any proposal to utilize further land in this area for the expansion of waste disposal facilities for Gloucestershire. The reasons for my disagreement with the proposal are as follows: The area already "enjoys" a substantial amount of recycling facility and attracts hoards of seagulls and other scavengers. The nearby villages are already blighted by the noise and damage of unavoidable heavy business traffic and this will be significantly: worsened by further development which is in fact avoidable. Road safety will be further compromised in the area by additional heavy transport travelling along local roads, particularly with regard to local schools and the young children and parents that use them. Parts of the existing premises are used by shooting clubs offering excellent facilities, for which there is no parallel in the area. These clubs have been in existence for many years, have exemplary records and cannot be re-sited as considerable sums have been spent in providing safety infrastructure and the provision of hundreds of trees to provide wildlife habitat and environmental benefits. The site is not central to the county and will require the transport of material on journeys of many miles, hardly a "GREEN" practice. I feel there must be several" more appropriate "sites for you to use and would ask you to consider those first.

4. Officer Response.

Comments noted. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishops Cleeve Strategic Site and as such fulfilled the inclusion criteria for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that this site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 80 Type IND Name Dave Cockcroft Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
4. Javelin Park, Haresfield		X	

4. Please give a reason for your answers to Question 3.

I oppose the use of Javelin Park for waste processing as it is one of the key sites available under current planning for use as a wind farm. If county targets for renewable energy are to be met it will be necessary to find sites for several wind farms. Under current planning there are many sites suitable for waste processing but very few sites currently suitable for wind farms. The loss of Javelin Park as a site that can make a significant contribution to the counties renewble energy targets will make it very unlikely that the county can achieve it's short and medium term renewable energy targets.

4. Officer Response.

Comment noted. There are no known proposals for a wind farm in this location. The site has planning permission for employment use, comprises previously developed land and has previously been allocated for waste in the Waste Local Plan (2004).

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

I support the development of multiple sites for residual waste processing, including sites outside Zone C, in order to minimise transport distances. Multiple smaller sites with appropriate technologies would also for more flexible accomodation of residual waste flows that could significantly reduce over time as recycling increases. Tie in to long term incinerator supply contracts will significantly reduce the incentive to reduce the waste stream.

8. Officer Response.

Comment noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the

Number 80 Type IND Name Dave Cockcroft Organisation not applicable/not provided

Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

17. Do you have any comments on Section 3?

There are significant carbon emissions from mass burn incinerators generally in excess of gas fired power stations and approaching those of coal fired power stations. These result from the proportion of residual waste which is derived from fossil fuels, for example plastic based packaging. As such I believe mass burn incinerators should have no place in a 21st century residual waste strategy. The approach that would produce the greatest benefit in terms of energy generated and minimum carbon emissions per unit of useful energy is MBT and anaerobic digestion technologies combined with small thermal gasifying CHP plants sited near to industry or residential users of heat.

17. Officer Response.

See response to question 8.

Number 243 Type IND Name R C Codwin Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	

4. Please give a reason for your answers to Question 3.

As an active member of Cheltenham & District Clay Club I am writing to you to object to the proposed closure of the club. I understand that area C Wingmoor Farm East has been identified as a possible waste recycling site, which would result in the closure of Cheltenham & District. Further development of this site would bring extra traffic, noise and further congestion to the area. Also this would be compounded when Cheltenham racecourse hold any of their meetings, which can result in very large volumes of traffic. I must also ask that if it is your intention to close Cheltenham & District Clay Club that you provide a written proposal on how you intend to re-house us. Closure of the club would be a shame as it provides a valuable, well managed environment on which people, from all walks of life, can participate in a legal, safe and enjoyable sport. Cheltenham & District Clay Club have invested in and enhanced the environment of the club grounds. They have an active tree planting policy and many more projects under consideration. I would urge you to consider more suitable sites for your purpose and to allow Cheltenham & District Clay Club to remain open.

4. Officer Response.

Comments noted. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the inclusion criteria for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from Tewkesbury Borough Council with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that this site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS national policy and any other material considerations.

Number 409 Type IND Name Trevor Colbeck Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Main population higher density and along this corridor. Concentrating sites near to main high population areas keeps transport to a minimum.

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch			
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre	X		
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester	X		
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			

4. Please give a reason for your answers to Question 3.

Suitable sites need to be spread along the zone. The sites need to have suitable road links.

4. Officer Response.

Comment noted. In terms of transport and road links, PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Agree

6. Please give a reason for your answer to Question 5.

No point planning sites that cannot handle projected worst senario

6. Officer Response.

Support noted. However, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the potential abolition of the RSS by Government casts doubt

Number 409 Type IND Name Trevor Colbeck Organisation not applicable/not provided

over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

Some waste may be part processed at these sites. Alternatively waste processes may be used at these sites more suitable to smaller volumes of waste if that is the case.

8. Officer Response.

Support noted, however, on balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney	X		
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

Not sufficient knowledge of these sites but may be suitable for processes such as

10. Officer Response.

comment noted

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

May reduce impact of transport on environment by allowing more waste to be processed near to source.

12. Officer Response.

Support noted.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

None known

13. Officer Response.

Noted.

14. Do you have any comments on the Executive Summary?

Number 409 Type IND Name Trevor Colbeck Organisation not applicable/not provided

No comments

14. Officer Response.

Noted.

15. Do you have any comments on Section 1?

No comments

15. Officer Response.

Noted.

16. Do you have any comments on Section 2?

No comments

16. Officer Response.

Noted.

17. Do you have any comments on Section 3?

It would be useful to know where the bulk of the waste is produced. Say for example 70% of the waste is produced in the Cheltenham/Gloucester area then either more sites in this area are appropriate or larger sites or processes that require greater quantities of material.

17. Officer Response.

Comments noted. Most waste is produced in Gloucester and Cheltenham (around 50,000 tonnes per annum each) equating to 40% of the County's total. The publication WCS will include all relevant facts and figures relating to waste arisings in Gloucestershire. This will be supplemented by a more detailed supporting evidence paper on waste data.

18. Do you have any comments on Section 4?

No comments

18. Officer Response.

Noted.

19. Do you have any comments on the Sustainability Appraisal reports?

No comments

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

No comments

20. Officer Response.

Noted.

Number 338 Type IND Name Mr and Mrs Collier Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch		X	
4. Javelin Park, Haresfield		X	
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence		X	
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works		X	
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

We find your questionnaire misleading and contradictive. Incinerators in Gloucester, which is in a valley is not an option irrespective to where you would want to place them. Recycling is a far better option, with targets reaching at least 80%. Our household achieves this on a weekly basis. Household not reaching these targets should be penalised. Gloucestershire County Council should review and better the recycling well above what they achieve today. Incinerators will only add to the poor air quality, poor health which will cost the environment and health services in this county. There are other alternatives e.g. invessel composting.

4. Officer Response.

Comment noted. At the present time the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10 which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. With regards to recycling the Council is actively promoting greater recycling with a target of at least 60% by 2019/2020. This is 10% higher than the national target of 50% over the same period. There will however always be an element of residual or leftover waste that cannot be recycled or composted. With regards to health impacts, PPS10 states that modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health. Furthermore, the detailed consideration of a waste process and the implications, if any, for human health is the responsibility of the pollution control authorities. PPS10 also states that, where concerns about health are raised, waste planning authorities should avoid carrying out their own detailed assessments, rather they should ensure, through drawing from Government advice and research and consultation with the relevant health authorities and agencies, that they have any advice on implications for health. The WPA duly sought the advice from the PCT/NHS through the site options consultation. In reference to in-vessel composting, this is not a residual waste technology. Residual waste is the waste left over after recycling and composting.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know

Number 338 Type IND Name Mr and Mrs Collier Organisation not applicable/not provided

1. Foss Cross Industrial Estate, north of Cirencester		X		
2. Hurst Farm, Lydney		X		
3. Land at Lydney Industrial Estate, Lydney		X		

10. Please give a reason for your answers to Question 9.

see question 4

10. Officer Response.

See previous response.

Number 220 Type IND Name L W Cook Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I'm not sure/I don't know

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X		
4. Javelin Park, Haresfield		X	
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence		X	
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works		X	
10. The Park, Wingmoor Farm West			

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Disagree

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester		X	
2. Hurst Farm, Lydney	X		
3. Land at Lydney Industrial Estate, Lydney	X		

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

Number 440 Type BUS Name Humphrey Cook Organisation Humphrey Cook Associates

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Too concentrated in one part of Gloucestershire along the M5 corridor. Very high transport distances across the County and CO2 emissions. Small scale local and flexible sites should be established near all the major towns - Stow, Cirencester, Chipping Camden, Moreton, Lydney, Cinderford, Newent in addition to Cheltenham, Gloucester and Tewkesbury.

2. Officer Response.

Comment noted. It is essential that the WCS presents a clear spatial strategy setting out what will be built and where. Zone C is consistent with national and regional policy. It includes Gloucester and Cheltenham which is where most of Gloucestershire's waste is generated. Treating this waste close to source will reduce the distance waste has to travel by road. The use of transfer facilities to bulk-up waste from smaller collection vehicles into larger vehicles, will help to reduce the number of separate trip movements that need to be made for the waste to reach the treatment/recovery facility/facilities. In terms of developing a network of smaller facilities, the site options consultation paper identifies 13 potential sites, 10 within Zone C, 3 outside Zone C. Views are invited on using a combination of different sites. The consultation makes it clear that whilst some of the sites are capable of providing a one-site solution, it may be that strategic waste management of municipal waste comes forward on several different sites. The council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the county. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. Significantly a number of the settlements suggested by the respondent, including Chipping Campden, Stow on the Wold and Moreton in Marsh are remote from the main waste arisings at Gloucester and Cheltenham. Allocating sites here would be inconsistent with national and regional policy which requires waste to be managed close to the main source of arisings.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			
4. Javelin Park, Haresfield		X	
5. Land adjacent to Quadrant Business Centre	X		
6. Land at Moreton Valence		X	
7. Land north of Railway Triangle, Gloucester	X		
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West			

Number 440 Type BUS Name Humphrey Cook Organisation Humphrey Cook Associates

4. Please give a reason for your answers to Question 3.

Nastend Farm is greenfield farmland and not suitable. Javelin Park is not suitable as it is situated in a rural location immediately adjacent to the AONB. A waste plant would destroy the view from the National Trust Haresfield Beacon as has Blooms Garden Centre which is completely white in a green setting. Javelin Park is in full view of the ancient part of Haresfield.

4. Officer Response.

Comments noted. Nastend Farm is currently agricultural land, but crucially it is allocated for employment use in the Stroud Local Plan, thus the decision on the acceptability of developing this land at some point in the future has already been taken. The Waste Planning Authority has carefully considered all the issues on this site. Since the site options consultation was undertaken in October 2009 and following discussions with the County Council as Waste Disposal Authority, there is significant uncertainty over the prospect of delivering a strategic waste management facility on this site. For this reason, it has been decided that this site will not be taken forward into the Publication WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations. In relation to Site 4, Javelin Park, this site is considered to be on the urban fringe rather than rural in character. It comprises previously developed land and has planning permission for employment use. The principle of development in this location has already been accepted. Notably the landscape assessment carried out in support of this site identifies it as having medium-high suitability in landscape terms. Design and layout would be a matter for negotiation at the planning application stage should a detailed proposal come forward on this site.

6. Please give a reason for your answer to Question 5.

Small scale local and flexible sites should be established near all the major towns - Stow, Cirencester, Chipping Camden, Moreton, Lydney, Cinderford, Newent in addition to Cheltenham, Gloucester and Tewkesbury. New residential development should incorporate waste treatment that produces electricity or distric heating through CHP as happens in Scandinavia and Germany.

6. Officer Response.

Comment noted. The proposed focus on Zone C will allow most of Gloucestershire's waste to be treated close to source and is consistent with national and regional policy. The urban extensions offer the opportunity to incorporate waste treatment producing heat and power however, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

8. Please give a reason for your answer to Question 7.

Small scale local and flexible sites should be established near all the major towns - Stow, Cirencester, Chipping Camden, Moreton, Lydney, Cinderford, Newent in addition to Cheltenham, Gloucester and Tewkesbury.

8. Officer Response.

Comment noted. Whilst the Council's preferred strategy is to provide strategic waste management facilities within Zone C, there is likely to be a role for sites outside this area e.g. smaller scale provision or supporting infrastructure e.g. waste transfer. Importantly however a number of the locations suggested are more than 16km from Gloucester or Cheltenham. Locating strategic waste management facilities at these places would be contrary to regional policy. On balance having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the publication Waste Core Strategy (WCS). It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the Waste Core Strategy (WCS) national policy and any other material considerations.

Number 440 Type BUS Name Humphrey Cook Organisation Humphrey Cook Associates

10. Please give a reason for your answers to Question 9.

Farmland should not be considered as the increasing home and currently unsustainable world population will require us to be more self-sufficient in food production only existing industrial sites should be considered.

10. Officer Response.

Comment noted. Whilst Hurst Farm is currently agricultural the site is allocated for employment uses under Policy (R) F Lydney in the adopted Forest of Dean Local Plan. The principle of development in this location has therefore already been accepted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. This site will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

12. Please give a reason for your answer to Question 11.

A single site to handle 150,000 tonnes of residual waste is far too inflexible and locks the County into a 25 year PFI contract which is the most expensive procurement route that the country can afford. If as predicted residual waste quantities will fall as a result of Government directives and industry/public responses then a single plant would have to bring in waste from outside the County to maintain its commercial viability.

12. Officer Response.

Comment noted. Following the decision by Defra in October 2010 to withdraw Gloucestershire County Council's Private Finance Investment (PFI) credits (worth £92million), the council is currently carrying out a strategic review of the project. The outcome from the review will be considered by Cabinet in February 2011. Ultimately Gloucestershire County Council has to find an alternative to landfill. Doing nothing is not an option. The contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Research shows that PFI helps deliver projects on time and on budget more effectively than other types of procurement. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly (amortising cost over shorter period) and therefore being unaffordable or there would be a balancing payment on contract expiry. It should not be assumed that economies of scale mean an inflexible solution. GCC recognises that regardless of the type of solution proposed, it is important that the solution must be able to cope with changes in waste volumes and composition, as it is inevitable such changes will happen. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability or a reduced cost to the authority.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

Former airfields/army bases at Aston Down, Kemble, Fairford, Little Rissington, South Cerney and Hullavington. Decommissioned nuclear power station site at Berkeley and the former Sharpness Docks - accessed by canal and not by road.

13. Officer Response.

Defence Estates were contacted in relation to land at Ashchurch, but indicated that they did not have any other land in Gloucestershire that was suitable for residual waste treatment, therefore it could be assumed that land still under MOD ownership such as South Cerney and Fairford would not be available. Hullavington is not in Gloucestershire. Numerous former MOD land has been investigated which includes Kemble (only land in Gloucestershire - site ref 438), Aston Down (site ref 433) and Little Rissington (now known as Upper Rissington (site 454). Kemble and Upper Rissington fell outside of the 16km criteria, therefore no further work was undertaken on these sites. However, technical assessment work was carried out on Aston Down airfield, but the site was not included in the consultation document due to deliverability issues. Please refer to Technical Evidence Paper WCS-N including Appendix C.55. Berkley Power Station was initially investigated (ref Site 434)

Number 440 Type BUS Name Humphrey Cook Organisation Humphrey Cook Associates

but this was found to fall outside of the 16km boundary from the fringe of the urban areas of Cheltenham and Gloucester and therefore no further assessment was carried out on the site. Please refer to Technical Evidence Paper WCS-N (Section 4 and Appendix A). The Sharpness Docks area did have some technical assessments carried out on it and two other parcels of land were submitted as part of the call for sites exercise. However, the landowners of the Sharpness Docks area (Site 547) indicated that the land was not available for residual waste management treatment and of the other parcels submitted one was in conflict with the landowners wishes and the other did not fulfil the 'inclusion criteria' outlined in Technical Evidence Paper WCS-N. For details of site 547 assessments please see Technical Evidence Paper WCS-N and its appendix C.89 and for the other parcels please refer to Technical Evidence Paper WCS-O (pages 30 and 31)

14. Do you have any comments on the Executive Summary?

A better than 60% reduce, re-use recycle target can be achieved - look at some european countries. 150,000 tonnes has become the base figure for the consultation and therefore any additional reduction from new or emerging technologies is excluded. 2026 is too far in the future for anyone to predict what will be required by that date.

14. Officer Response.

Comment noted. The Council's recycling/composting target is at least 60% by 2020. This is 10% higher than the national target over the same period. The contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. However, Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. The end date of the WCS is 2027. Core Strategies are required to cover a period of at least 15 years from the date of adoption which is anticipated to be 2011 for the WCS.

15. Do you have any comments on Section 1?

The cancellation of the SW regional assembly will give control of housing numbers back to Gloucestershire CC so the projected 56,000 can be greatly reduced or cancelled. Combined sites within and outside Zone C represents the most appropriate and sustainable solution by keeping the waste problem as near to the public as possible so that they have some kind of 'ownership'.

15. Officer Response.

Comment noted. The potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead their waste management requirements will be addressed through the general policies and requirements of the Waste Core Strategy.

16. Do you have any comments on Section 2?

The EU landfill tax was promoted by Germany and France and imposed on the UK so why don't we look at what these two countries do and copy their technologies to achieve higher rates of waste disposal?

16. Officer Response.

Comment noted. Germany and, to a lesser extent, France, landfill less waste than the UK. The policies and proposals within the WCS will help to achieve a shift away from landfill.

17. Do you have any comments on Section 3?

For a sustainable solution keep the waste problem as near to the public as possible so that they have some kind of ownership and do not feel that GCC is dealing with the issue of a remote single plant. Zone C excludes most of the County from 'waste should be disposed of as close as possible to where it is produced'. Javelin Park lies immediately adjacent to the AONB.

Number 440 Type BUS Name Humphrey Cook Organisation Humphrey Cook Associates

17. Officer Response.

Comment noted. The need to treat waste close to source is acknowledged. In Gloucestershire it is the case that most waste is generated at Gloucester and Cheltenham. The delineation of Zone C takes this fact into account. Views are invited on the possibility of using several sites not just one site. The fact that Javelin Park lies close to the AONB does not preclude the possibility of development there. It is a previously developed site with planning permission for employment use and an allocation in the adopted Waste Local Plan. The principle of development in this location has therefore already been accepted.

18. Do you have any comments on Section 4?

Why haven't the results of the invitations to industry for outline solutions been published? Will the detailed solutions be published before any decision is made by GCC? District and Parish Councils must be part of the consultation process for the planning applications made for any of the sites.

18. Officer Response.

Comment noted. The invitation to industry to submit outline solutions is part of the residual waste PFI project and not the WCS. Whilst the two projects are related, it is not necessary for these outline solutions to be published in order to progress the WCS. The same applies to the publication of detailed solutions. The purpose of the WCS is to provide the planning framework within which any planning applications for waste related development (including the residual PFI project) will be considered. The merits of the WCS will be considered by an independent Planning Inspector through an examination. The Inspector will then issue a binding report to the Council identifying any necessary changes. The Council will then be in a position to formally adopt the WCS subject to making those changes. In terms of consultation, when any planning application is submitted, consultation will be carried out in line with the requirements set out in the Council's adopted Statement of Community Involvement (SCI).

19. Do you have any comments on the Sustainability Appraisal reports?

not seen

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

not seen

20. Officer Response.

Noted.

Number 78 Type IND Name Mike Cooke Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I read with some concern that Gloucestershire County Council is considering the use of thirteen (13) listed sites for possible waste treatment in Gloucestershire I strongly object to this proposal on the grounds that: I object to the use of any of these sites for incineration. Incineration creates toxic fly ash which is toxic, dangerous and has to be transported and buried creating a risk to nearby residents which is unacceptable. I understand that incineration contracts will be let for at least 24 years, committing to a solution that takes no account of the expected substantial reduction in the volume of waste not of any newer, more efficient and effective technologies that are being rapidly developed. The long term costs to the taxpayer will be higher with incineration that with a more tailored solution that accounts for developing technologies. The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for the community to take responsibility for the disposal of the waste in localised areas. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria the council is obliged to satisfy and is better for the environment and for the taxpayer. Large incinerators in other areas of the country are not proven to be safe and are driven by current technological capability rather than satisfying health and safety criteria. The air quality in the local neighbourhood is already poor due to dust and other airborne particles created by Allstone Sand and Gravel near Horton Road. The addition of an incinerator at the Railway Triangle, Horton, will further degrade air quality in the neighbourhood to an unacceptable and dangerous level.

17. Officer Response.

Comments noted. Dealing with each in turn. The Council is currently technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. In terms of health, PPS10, states that modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health. Notwithstanding the above, the site has not been taken forward into the publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 207 Type IND Name Martin Cooke Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

They are all too near built up areas.

2. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10 which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should `provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch		X	
4. Javelin Park, Haresfield		X	
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence		X	
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works		X	
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

As stated in Q1. They are too near people's homes.

4. Officer Response.

Comment noted. Please see response to Q2.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Disagree

6. Please give a reason for your answer to Question 5.

Housing estates and waste disposal centres do not mix.

Number 207 Type IND Name Martin Cooke Organisation not applicable/not provided

6. Officer Response.

Comment noted. Please see response to Q2. Furthermore, the Government's intention to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I do not support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

Sites should be found which are stand alone sites well away from populous areas.There should be no sites in Zone C therefore the need for provision of flexiblity does not arise.

8. Officer Response.

Comment noted. Please see response to Q2.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester		X	
2. Hurst Farm, Lydney		X	
3. Land at Lydney Industrial Estate, Lydney		X	

10. Please give a reason for your answers to Question 9.

They have poor transport links and the Lydney sites are too near to the town.

10. Officer Response.

Comment noted. PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. For site 1a, the assessment identifies good access to the strategic road network but rates the site less favourably in terms of sustainable transport and employee accessibility. For site 2a, the initial assessment is fairly positive with a medium score in terms of proximity to the Strategic Highway Network and a high score in terms of the potential for sustainable transport use. The assessment for site 3a is also fairly positive with a medium score in terms of proximity to the Strategic Highway Network and a high score in terms of the potential for sustainable transport use. Any strategic site allocation made in the publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. In terms of proximity to Lydney, both sites 2a and 3a are some distance from the edge of Lydney. Please also see response to Q2. It is essential that the WCS provides a clear strategy setting out what will be built and where. This will provide certainty and confidence to the development industry and help bring proposals forward. The Council's preferred strategy is to focus the location of new strategic waste management facilities on the area defined as Zone C. This approach is considered to be consistent with national policy (PPS10) and the Regional Waste Strategy. Although the preferred focus for strategic waste management is Zone C, a number of other sites were identified outside this zone in the Forest of Dean and Cotswold District in order to provide suitable flexibility and support for the Zone C sites. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of

Number 207 Type IND Name Martin Cooke Organisation not applicable/not provided

the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I do not support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

The question does not arise if none of these sites are suitable.

12. Officer Response.

Comment noted.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

As a layman I cannot give exact details however at a pinch Sharpness/ Berkeley Power Station which is now decomissioned have rail/road and waterway links for the transfer of waste.This seems the most sensible option and do not give us the excuse of contamination.

13. Officer Response.

Comment noted. Berkeley Power Station was initially investigated as part of the site selection process (ref Site 434) but was found to fall outside of the 16km threshold from the fringe of the urban areas of Cheltenham and Gloucester and therefore no further assessment was carried out on the site. Please refer to Technical Evidence Paper WCS-N (Section 4 and Appendix A). The Sharpness Docks area did have some technical assessments carried out on it and two other parcels of land were submitted as part of the call for sites exercise. However, the landowners of the Sharpness Docks area (Site 547) indicated that the land was not available for residual waste management treatment and of the other parcels submitted one was in conflict with the landowners wishes and the other did not fulfil the inclusion criteria outlined in Technical Evidence Paper WCS-N. For details of site 547 assessments please see Technical Evidence Paper WCS-N and its Appendix C.89 and for the other parcels please refer to Technical Evidence Paper WCS-O (pages 30 and 31).

14. Do you have any comments on the Executive Summary?

No except I do not expect a consultation put out to the public to read like some sort of exam paper .The message is very simple the residents of Quedgeley and any other area do not want a waste facility on their doorstep. I have seen your road show and it is clear any facility will have a bad environmental impact on the surrounding area . Incineration is going to be the favoured option do not do it at Quedgeley.

14. Officer Response.

Comment noted. The consultation document has been worded as simply and succinctly as possible. Waste is however a complex subject and it is not always possible to simplify all terminology. It is not clear that any facility will have a bad environmental impact. Modern waste management facilities are well-run and any potential impact will be addressed at the planning stage accordingly. In terms of incineration, at the present time the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10 which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.

15. Do you have any comments on Section 1?

Number 207 Type IND Name Martin Cooke Organisation not applicable/not provided

No

15. Officer Response.

Noted.

16. Do you have any comments on Section 2?

No

16. Officer Response.

Noted.

17. Do you have any comments on Section 3?

No

17. Officer Response.

Noted.

18. Do you have any comments on Section 4?

No

18. Officer Response.

Noted.

19. Do you have any comments on the Sustainability Appraisal reports?

No

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

No

20. Officer Response.

Noted.

Number 1834 Type BUS Name Jacky Cooper Organisation G and M Motors (Glos) Ltd

4. Please give a reason for your answers to Question 3.

Our business is in close proximity of the proposed site and we would like to object to the proposal.
Your SFRA Level 2 indicates that there are no flooding issues on this site. This information is incorrect. During winter months the end of the lane where it exits onto the A38 is constantly flooding due to the bottleneck at this point where the water flows. This can only increase if the proposal goes ahead. The dust from the site is a major problem for us. Our customers cars are being covered in dust resulting in us having to wash them before they are returned. Our office is always full of it and everything you touch is covered in it. In the winter the lane itself is a quagmire of mud from all the lorries going up and down it all day. This again results in customers complaints about the state of their cars upon return. We may possibly lose custom if this problem increases as it surely would with all the extra dust, mud and lorries.

4. Officer Response.

In relation to the concerns about flooding any planning application on the site over 1 hectare in size would require a Flood Risk Assessment to be submitted with any mitigation measures identified where appropriate. Noise, dust and lighting are matters that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any sensitive receptors. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning conditions. With regard to pollution it should be noted that planning and pollution control regimes are separate but complimentary. Pollution control is concerned with preventing pollution whilst planning controls the development and use of land. Waste planning authorities are expected to work on the assumption that the relevant pollution control regime will be properly applied and enforced. PPS10 states that modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health.

Number 205 Type IND Name Julian Cope Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

It makes sense to concentrate on the main connurbation areas, as this will make the facility closer to large volumes of waste and thus reduce road miles travelled by (most of) the waste that is collected.

2. Officer Response.

Support noted.

Number 63 Type IND Name Beryl Cottam Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I write to object to the use of all 13 of the sites listed for possible waste treatment in Gloucestershire on the grounds that: Any of these sites could be used for incineration, which I oppose. Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. The long term costs to the taxpayer will be higher with incineration. Incinerators act as a disincentive to reduce, reuse and recycle. The introduction of the additional household collection service food waste/cardboard etc., due to commence in February is the right step forward towards educating the public of the importance of recycling. The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. Large incinerators in other areas of the country are already deemed to be a mistake.

17. Officer Response.

Comments noted. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 3 Type IND Name John A Coxon Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I refer to the controversy about the proposal to install a waste incinerator at Javelin Park. Both David Drew and Parmjit Dhanda are vehemently opposed to same, but I believe them to be wrong. Witness the fact that a clean, picturesque country like Switzerland makes extensive use of incinerators for burning non-recyclable non-toxic waste and uses them to generate power for 250,000 homes too. I firmly believe that installing an incinerator without copying the Swiss model surrounded by trees and with power generating plant would be very wrong. Javelin Park is an opportunity to construct an environmentally-friendly and useful way of eliminating land-fill plus the benefits of earning revenue disposing of similar waste from neighbouring local authorities in the same manner as Coventry whose incinerating plant appears to follow the Swiss example and is working 24 hours a day/7 days a week. Attached to this letter is a reproduction and web address for Swiss World so you can examine same for yourselves.

17. Officer Response.

Comments noted. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. Notwithstanding this, the heat and power that can be gained from a waste facility offers a real benefit environmentally by reducing our reliance on fossil fuels and creates a potential income of several million pounds per annum for the council. Energy recovery (in the form or electricity and/or heat) will be dealt with under Solution Performance and guarantees provided by contractors and throughout the procurement process. There is legislation in place to ensure modern incinerators (and other types of thermal treatment, like pyrolysis and gasification) use the heat and power captured from the process. This can be used to generate heat and electricity to supply the local communities/businesses around a facility; this is generally known as Combined Heat and Power (CHP). However, this technology's primary function is for waste disposal and does not market itself as a primary source of heat and power generation. Such outputs are a benefit that can be harnessed from it primary waste disposal function. Where Bidders have proposed incineration as part of their solution for Gloucestershire, the Bidders will be expected to explore the possibility of CHP and ensure that the plant is CHP enabled.

Number 180 Type IND Name John Coxon Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Zone C broadly lies along a rapid transport route the M5. It follows that all waste processing/disposal sites should be as close as possible to motorway junctions to maximize transport efficiency.

2. Officer Response.

Support noted. The proposed focus on Zone C has been taken forward into the publication WCS with four strategic site allocations identified within this area.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

I am not familiar with any of the other sites, so I am not qualified to comment on them.

4. Officer Response.

Comment noted.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

6. Please give a reason for your answer to Question 5.

I have not studied The Draft Regional Spatial Strategy (RSS) and cannot comment.

6. Officer Response.

Comment noted.

7. Do you support the identification of sites outside Zone C?

I do not support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

See Q2 answer.

Number 180 Type IND Name John Coxon Organisation not applicable/not provided

8. Officer Response.

See previous response to Question 2.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

I am not familiar with any of these sites, so I am unable to comment on them.

10. Officer Response.

Comment noted.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

Only if these sites are within easy reach of good roads/motorway.

12. Officer Response.

Comment noted. PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan.

14. Do you have any comments on the Executive Summary?

No

14. Officer Response.

noted

15. Do you have any comments on Section 1?

No

15. Officer Response.

noted

16. Do you have any comments on Section 2?

No

16. Officer Response.

noted

17. Do you have any comments on Section 3?

No

Number 180 Type IND Name John Coxon Organisation not applicable/not provided

17. Officer Response.

Noted

18. Do you have any comments on Section 4?

No

18. Officer Response.

Noted

19. Do you have any comments on the Sustainability Appraisal reports?

No

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

No

20. Officer Response.

Noted.

Number 49 Type IND Name A Craven Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
4. Javelin Park, Haresfield		X	

4. Please give a reason for your answers to Question 3.

I write to object to the use of Javelin Park for possible waste treatment including a PFI Incineration contract on the grounds that; I am hoping to have children within the next few years and would fear for their good health if an Incineration plant were to be built at Javelin Park with the resultant toxic fallout. Large and small incinerators in other areas of the country have already been deemed a mistake as they were unable to keep within their discharge limits and have been closed down. Local residents to other Incineration sites have proved a link between the toxic fallout from incineration and their increased risk of serious health issues, causing the sites to be closed or having restricted use conditions applied. I strongly object to the use of Javelin Park or any of the other waste sites in this County or bordering Counties for Incineration as the toxic fallout will accumulate over time and result in increased dioxins levels in all farm products especially in the local milk production. I even more strongly object to the proposed site at Javelin Park having 100,000 tons of surplus capacity with the intention of importing toxic waste from other parts of the country and incinerating it here with the resultant toxic fallout. Incineration creates toxic fly ash, which contains dioxins and is very dangerous over the long term for local resident's health. The incineration residue has to be transported and buried creating a further risk to nearby residents; this is unacceptable. The long term costs to the local taxpayer will be higher with incineration. I understand that incineration PFI contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer.

4. Officer Response.

Comments noted. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. Following the decision by Defra in October 2010 to withdraw Gloucestershire County Council's Private Finance Investment (PFI) credits (worth £92million), the council is currently carrying out a strategic review of the project. The outcome from the review will be considered by Cabinet in February 2011. Ultimately Gloucestershire County Council has to find an alternative to landfill. Doing nothing is not an option. The contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Research shows that PFI helps deliver projects on time and on budget more effectively than other types of procurement. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly (amortising cost over shorter period) and therefore being unaffordable or there would be a balancing payment on contract expiry. It should not be assumed that economies of scale mean an inflexible solution. GCC recognises that regardless of the type of solution proposed, it is important that the solution must be able to cope with changes in waste volumes and composition, as it is inevitable such changes will happen. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability or a reduced cost to the authority. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester

Number 49 Type IND Name A Craven Organisation not applicable/not provided

and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 56 Type IND Name Richard Craven Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
4. Javelin Park, Haresfield		X	

4. Please give a reason for your answers to Question 3.

I write to object to the use of Javelin Park for possible waste treatment including a PFI Incineration contract on the grounds that; Local residents to other Incineration sites have proved a link between the toxic fallout from incineration and their increased risk of serious health issues, causing the sites to be closed or having restricted use conditions applied. I strongly object to the use of Javelin Park or any of the other waste sites in this County or bordering Counties for Incineration as the toxic fallout will accumulate over time and result in increased dioxins levels in all farm products especially in the local milk production. I even more strongly object to the proposed site at Javelin Park having 100,000 tons of surplus capacity with the intention of importing toxic waste from other parts of the country and incinerating it here with the resultant toxic fallout. Incineration creates toxic fly ash, which contains dioxins and is very dangerous over the long term for local resident's health. The incineration residue has to be transported and buried creating a further risk to nearby residents; this is unacceptable. I understand that incineration PFI contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. The long term costs to the local taxpayer will be higher with incineration. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. Large and small incinerators in other areas of the country have already been deemed a mistake as they were unable to keep within their discharge limits and have been closed down. I strongly believe in recycling especially plastics, which create dioxins when burnt. More research into new products should be done that use recycled raw materials as their primary input.

4. Officer Response.

Comments noted. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. Following the decision by Defra in October 2010 to withdraw Gloucestershire County Council's Private Finance Investment (PFI) credits (worth £92million), the council is currently carrying out a strategic review of the project. The outcome from the review will be considered by Cabinet in February 2011. Ultimately Gloucestershire County Council has to find an alternative to landfill. Doing nothing is not an option. The contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Research shows that PFI helps deliver projects on time and on budget more effectively than other types of procurement. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly (amortising cost over shorter period) and therefore being unaffordable or there would be a balancing payment on contract expiry. It should not be assumed that economies of scale mean an inflexible solution. GCC recognises that regardless of the type of solution proposed, it is important that the solution must be able to cope with changes in waste volumes and composition, as it is inevitable such changes will happen. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability or a reduced cost to the authority. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and

Number 56 Type IND Name Richard Craven Organisation not applicable/not provided

Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 64 Type IND Name Anne Craven Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
4. Javelin Park, Haresfield		X	

4. Please give a reason for your answers to Question 3.

I write to object to the use of Javelin Park for possible waste treatment including a PFI Incineration contract on the grounds that; Large and small incinerators in other areas of the country have already been deemed a mistake as they were unable to keep within their discharge limits and have been closed down. Local residents to other Incineration sites have proved a link between the toxic fallout from incineration and their increased risk of serious health issues, causing the sites to be closed or having restricted use conditions applied. I strongly object to the use of Javelin Park or any of the other waste sites in this County or bordering Counties for Incineration as the toxic fallout will accumulate over time and result in increased dioxins levels in all farm products especially in the local milk production. I even more strongly object to the proposed site at Javelin Park having 100,000 tons of surplus capacity with the intention of importing toxic waste from other parts of the country and incinerating it here with the resultant toxic fallout. Incineration creates toxic fly ash, which contains dioxins and is very dangerous over the long term for local resident's health. The incineration residue has to be transported and buried creating a further risk to nearby residents; this is unacceptable. I understand that incineration PFI contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. The long term costs to the local taxpayer will be higher with incineration. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. I strongly believe in recycling especially plastics, which create dioxins when burnt. More research into new products should be done that use recycled raw materials as their primary input.

4. Officer Response.

Comments noted. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. PPS10 states that modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health. Furthermore, the detailed consideration of a waste process and the implications, if any, for human health is the responsibility of the pollution control authorities. PPS10 also states that, where concerns about health are raised, waste planning authorities should avoid carrying out their own detailed assessments, rather they should ensure, through drawing from Government advice and research and consultation with the relevant health authorities and agencies, that they have any advice on implications for health. The WPA duly sought the advice from the PCT/NHS through the site options consultation. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow

Number 64 Type IND Name Anne Craven Organisation not applicable/not provided

for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 147 Type PC Name Sue Creswick Organisation Stroud Town Council

2. Please give a reason for your answer to Question 1.

We broadly support the use of identified sites in 'Zone C' on the basis that they are near to the larger conurbations and major roads.

2. Officer Response.

Support noted.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

We also support the provision of sites outside 'Zone C' in order to minimise the transport requirement from larger towns elsewhere in the county. This is consistent with the Regional Waste Strategy principle of disposal of waste as close as possible to where it is produced.

8. Officer Response.

Support noted. It is important to note however that most of Gloucestershire's waste is produced within Zone C. Treating this waste close to source is consistent with national and regional policy. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

17. Do you have any comments on Section 3?

We would like to see further consideration being given to other uses for the sites for renewable energy production. In particular Javelin Park is one of a very few viable sites, under current planning restrictions, available for development of a wind farm. This should be considered in light of the county's commitment to renewable energy targets, for example the Gloucestershire Renewable Energy Strategy 2007-2017 identifies a target of 40 MW installed capacity by 2010. We strongly oppose a single large waste incinerator at Javelin Park or any of the other sites for the following reasons. Incineration contracts typically last 28 years and would lock Gloucestershire into continuing to supply high levels of 'residual waste' of for this entire period. It will be a disincentive to improve recycling rates and is inconsistent with targets for higher percentages of recycling and composting. It is more cost effective to reduce the residual waste stream than commit to fixed volume supply contacts for mass burn incineration. It will be difficult to make effective use of the heat generated from a single large installation and this significantly reduces the overall efficiency in utilising the energy released by burning the waste. This is not renewable energy since much of the residual waste, plastic packaging for example, is fossil fuel derived. The CO2 emissions from electricity-only mass burn incinerators have been shown to be significantly higher, per unit of energy produced, than conventional gas power stations. There are still significant public concerns over the toxicity of emissions and fly ash and its safe disposal. In addition to fly ash there is a large amount of bottom ash, at least 20% of the original waste volume, that will still need to be disposed of. It is likely much of this will still go to landfill as the volume is far in excess of that which could be safely reused for building materials etc. We would strongly support a more flexible solution with a range of appropriate facilities on multiple sites near to where the waste is produced. This would: Allow for a scaleable solution to suit the volume and composition of the residual waste. Could also provide soil-conditioning products (MBT with AD or composting). Reduce transportation required which will reduce transport costs. Provide resilience in the case of plant failure. We note the positive reports on the use of Mechanical and Biological Treatment (MBT) and are encouraged that other local authorities in the country are installing this technology. The residue from MBT can go to distributed, small thermal gasifiers where the heat and power can be fully used. The residual ash could be used as filler for concrete, with only very small amounts going to landfill. We also highlight the advantages of methane production from anaerobic digestion and its potential use as a transport fuel or feed in to the gas grid.

17. Officer Response.

Number 147 Type PC Name Sue Creswick Organisation Stroud Town Council

Comments noted. Whilst Javelin Park may be a suitable location for a wind farm there are no current proposals for such a use. The site currently has planning permission for employment use and as such, it is appropriate to consider it for waste management. In terms of technology, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. In terms of energy generation, incineration is currently the only proven technology to produce energy, Advanced Thermal Treatment and AD are new technologies and are not wholly proven on residual waste. There are developing markets for the outputs from AD, such as using the biogas produced but as discussed above, the process has not been proven on residual waste alone. A key aspect of evaluating the bids will be the balance between the deliverability and risk associated with new technologies against the risk of the technology and markets failing. With regard to CO2 emissions, the heat and power that can be gained from a waste facility offers a real benefit environmentally by reducing our reliance on fossil fuels and creates a potential income of several million pounds per annum for the council. Energy recovery (in the form or electricity and/or heat) will be dealt with under Solution Performance and guarantees provided by contractors and throughout the procurement process. Waste management and the move away from landfill are driven by the Climate Change agenda. Climate change is a wider issue which the development of this solution can positively contribute. Carbon footprint is assessed as part of the life cycle analysis (WRATE0 at ISDS. GCC will ask for details of emissions management as well as any other foreseeable environmental impacts and plans to mitigate these will be requested during competitive dialogue. DEFRA have commented on this issue directly by stating: "The plans (for Gloucestershire) could also make an important contribution to the drive to tackle climate change by delivering estimated net carbon savings of 33,800 tonnes in 2020, compared to the current arrangements, or 64,700 tonnes if the final technology solution includes combined heat and power." In terms of health impact, PPS10, states that 'modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health'. GCC view health impacts and safety as important and this will be explored at the ISOS, ISDS and competitive dialogue stages. The bidders must demonstrate their ability to deliver facilities that comply with legislation and policy. As with 'monitoring service', it will be discussed during ISDS and competitive dialogue. Various method statements will require Bidders to outline their approach to legislation and compliance. This is standard for any contract/procurement which the council is involved in. This is also an opportunity for the council to explore the concept or not just complying with regulations and emission controls, but also the potential to excel these, and understand the implications and benefits of bettering the proposed solutions. APC (fly-ash) residues would be regulated by the Environment Agency through the Environmental Permitting regime. The HPA has reviewed research undertaken to examine the suggested links between emissions from municipal waste incinerators and effects on health and stated that 'Whilst it is not possible to completely rule out adverse health effects from modern, well regulated waste incinerators, any potential damage to the health of those living close by is likely to be very small, if detectable. This is based on assessments of the effects of air pollutants on health and the fact that modern and well managed incinerators make only a very small contribution to local concentrations of air pollutants (PM10s -waste incineration are 0.02% of the total compared with 18% and 22% for road transport and industry (production processes) respectively). Any potential risk of cancer due to residency near to municipal waste incinerators is

Number 147 Type PC Name Sue Creswick Organisation Stroud Town Council

exceedingly low and probably not measurable by the most modern techniques. With regard to the distribution of sites, it should not be assumed that economies of scale mean an inflexible solution. GCC recognises that regardless of the type of solution proposed, it is important that the solution must be able to cope with changes in waste volumes and composition, as it is inevitable such changes will happen. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. The council requires a residual waste solution that can meet the needs of Gloucestershire. GCC recognises that the solution must meet several key criteria and be deliverable in planning, technological, environmental and financial terms. These criteria were given to waste management companies who were bidding for the project as key to any solution. GCC do not have a preferred technology and have encouraged bidders to come back with their proposals that could meet these criteria. In December 2009, GCC announced the shortlist of successful Bidders to move to the detailed solution stage, this announcement also included the types of core technologies that these Bidders have proposed, which included MBT and incineration.

Number 272 Type IND Name J K Critchley Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I write to object to the use of all 13 of the sites listed for possible waste treatment in Gloucestershire on the grounds that: Any of these sites could be used for incineration, which I oppose. Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. The long term costs to the taxpayer will be higher with incineration. Incinerators act as a disincentive to reduce, reuse and recycle. The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and its better for the environment and for the taxpayer. Large incinerators in other areas of the country are already deemed to be a mistake.

17. Officer Response.

Comments noted. Dealing with each in turn. The Council is currently technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. In terms of contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. In terms of incineration acting as a disincentive to recycling, GCC will be procuring a solution that aligns with its recycling and composting objectives. Tonnages are based on achieving 60% recycling capacity and are reviewed regularly using the most up to date figures. 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling as reality proves the contra argument. With regard to the distribution of sites, the council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the County. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. The advantages and disadvantages would be investigated further during the procurement process.

Number 316 Type ENV Name Martin Crix Organisation MLAGB - The Muzzle Loaders''

17. Do you have any comments on Section 3?

My name is Martin Crix and I am both a Director and Shotgun Secretary for the Muzzle Loaders Association of Great Britain (MLAGB). We are an Association that is the National Governing Body for shooting and collecting antique muzzle loading arms. For a number of years we have had both the pleasure and privilege of holding one of our National Muzzle Loading Clay Pigeon Competitions at the Cheltenham & District Clay Club ground at Stoke Orchard. This has been arranged with the club by the MLAGB Gloucester Branch. Cheltenham & District Clay Club is an exceptionally well run club with a thriving membership. We have always been made most welcome by the club members and this annual event in our calendar is one that is always popular and that we all look forward to. In October this year, we shot our annual autumn national competition. We were concerned to learn that the Stoke Orchard clay ground is one of a number of sites that you are considering for development into a Waste Treatment site. On behalf of the MLAGB membership, I would urge you not to choose the Stoke Orchard site as it would deprive the Cheltenham & District Clay Club of their wonderful shooting ground and, consequently, the use of the ground for the annual MLAGB competition. The members of the Cheltenham & District Clay Club have, over many years, invested hundreds of hours of hard physical graft and considerable sums of money into landscaping and nurturing the site into the stunningly beautiful shooting ground that it is today. As a visitor, I am most impressed in the way that the Club encourages family participation. It is wonderful to see whole families out together on a Sunday morning, having fun, shooting in a friendly and safe environment. The Club members deserve to keep their shooting ground given all the invested effort. If you have any doubts about what is written here, I would suggest that you go along to the club on any Sunday morning and have a look for yourself. Cheltenham & District Clay Club is an outstanding club with excellent facilities. Please make the right choice and allow this club to continue to thrive.

17. Officer Response.

Comments noted. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the inclusion criteria for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that this site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 33 Type IND Name David and Ashley Croft Organisation not applicable/not provided

17. Do you have any comments on Section 3?

We write with regard to the consultation on sites that could potentially be used for the treatment of waste by Gloucestershire County Council. The area we are concerned about is listed as 'Area C at Wingmoor Farm East'. Cheltenham and District Clay Club, situated on this site, of which we are members, has a lack of similar facilities in the area and we think it would be a shame to shut down a club that is self-sufficient and provides young and old with quality time. The Club has been established for many years, is very popular and has a full membership, plus a large waiting list. The Club, as we mentioned, is self-sufficient, as it has developed itself by providing its own clubhouse, clay traps etc., through club membership. To relocate would cost a lot of money, which the club could not afford. Self-sufficient groups are much needed and provide people with something to look forward to. The location is ideal as the noise level to neighbours is insignificant. There are a lot of waste and landfill sites around Bishops Cleeve and Stoke Orchard already, so it would be beneficial to allow our Club to continue without burdening the area further. Other sites have better access and are already vacant and so using them would not disrupt any previous use. As this site is the only one with an activity already located at it, it would seem purposeless to destroy the joy of a self sufficient group when other sites are obsolete. This site has taken many years to develop with the planting of many trees etc., and cannot be replaced easily. Please look at this objectively. To use a site that has been built up over the years to give a large number of people recreation should not be destroyed for the treatment of waste when there are a number of obsolete sites that would serve the same purpose.

17. Officer Response.

Comments noted. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishops Cleeve Strategic Site and as such fulfilled the inclusion criteria for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that this site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 46 Type MOP Name Roger Cullimore Organisation Moreton C Cullimore (Gravels)

17. Do you have any comments on Section 3?

Our view is that the County Council have to have policies to open sand and gravel sites in the Severn Vale to provide a greater variety of aggregates for the future and the resulting voids can then be available for inert filling from construction sites. With the recycling facility we have at Netherhills, there is also the possibility of blending the inert mineral rich sub-soils with municipal organic composting waste to see whether or not it is something that could be done. If this is possible, we could market the blended compost back to local Authorities, which would contribute to the National Policy (Fig.3), The Waste Hierarchy, Page 16. If this is something that the County wishes to discuss further, please let me know.

17. Officer Response.

Comment noted. Whilst minerals and waste planning are inter-related to an extent (insofar as mineral sites may be used for waste management) this issue will be dealt with in the Minerals Core Strategy which will be prepared after the WCS.

Number 387 Type IND Name Gregory Dance Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I have read about your proposals for waste processing sites in the county and have several concerns about the proposals on which I would like you to answer my concerns. Firstly I am convinced that a large single incinerator is intended to be built which would burn wastes from the entire county, and possibly from surrounding areas. I oppose this because it would inevitably lead to excessive air and noise pollution both from servicing vehicles and the incinerator itself, particularly in the close vicinity of the site itself. I believe that the incinerator would also be prone to producing fly ash in the event that its fuel mixture isn't correct and that establishing a correct fuel mix is not possible. Secondly I am opposed to a long 24+ year contract being signed with a commercial company on behalf of the ratepayers of the county. This is because as volumes of waste reduce over time, (the trend will soon be downwards and will continue to be so) the lack of waste fuel volumes delivered to an incinerator would result in high penalty costs to ratepayers due to the contractual obligations with the operator of the incinerator. This situation already has precedence in other local authorities and is a clear warning which GCC must heed. To not do so by disregarding the evidence would display at the least incompetence, and if costly penalties for ratepayers did result, maladministration. I believe that GCC has been made fully aware of the superior alternative methods that are already available for the processing of wastes which include; 1) Upgrading waste collection practices to maximise kerb side sorting of recyclable materials to include all plastics, compostable wastes etc 2) Mechanical Biological Treatment. 3) Anerobic Digestion of compostable wastes to produce CH4 (Methane) for injection into the natural gas infrastructure. The building of a number of smaller MBT and AD facilities may not attract the PFI funding that incinerators can, however those facilities would not then ensnare the ratepayers in long term contractural cost penalties over several decades either!

17. Officer Response.

Dealing with each in turn. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10 which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. In terms of health issues, PPS10 states that modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health. Furthermore, the detailed consideration of a waste process and the implications, if any, for human health is the responsibility of the pollution control authorities. PPS10 also states that, where concerns about health are raised, waste planning authorities should avoid carrying out their own detailed assessments rather they should ensure, through drawing from Government advice and research and consultation with the relevant health authorities and agencies, that they have any advice on implications for health. The WPA duly sought the advice from the PCT/NHS through the site options consultation. Following the decision by Defra in October 2010 to withdraw Gloucestershire County Council's Private Finance Investment (PFI) credits (worth £92million), the council is currently carrying out a strategic review of the project. The outcome from the review will be considered by Cabinet in February 2011. Ultimately Gloucestershire County Council has to find an alternative to landfill. Doing nothing is not an option. The contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly (amortising cost over shorter period) and therefore being unaffordable or there would be a balancing payment on contract expiry. It should not be assumed that economies of scale mean an inflexible solution. GCC recognises that regardless of the type of solution proposed, it is important that the solution must be able to cope with changes in waste volumes and composition, as it is inevitable such changes will happen. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability or a reduced cost to the authority.

Number 10 Type IND Name John Darwent Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I am opposed to a one site solution for the County, I feel that this would not be sustainable on the grounds that the size and cost of the installation and the need for it to be operating at full capacity, would result in a substantial amount of waste being brought into the county from elsewhere. This would be particularly so if sited in the Stonehouse area given the ease of access from Bristol and its environs. Given that the bulk of the waste in the county will come from the principal settlements of Gloucester and Cheltenham and the likelihood of further development taking place adjacent to them, I would suggest that a site close to the north of Cheltenham and another close to the south of Gloucester (possibly Javelin Park) should be considered. Such siting would provide the optimum opportunity for utilising the heat and fuel generated. Other than Javelin Park and Nastend Farm sites, I am not sufficiently informed about the suitability of the other sites closer to these areas to comment on their suitability. The Nastend Farm site is within the rural parish of Eastington and while the land is allocated for industrial use, I believe the environmental impact of a waste treatment plant in this location is totally unacceptable. I am against Incineration on any of the sites, I believe that new and improved technological development is much more likely to take place in Biological and Anaerobic treatments which would be more environmentally friendly and acceptable to the public. We should not get locked in to excessively long term contracts which I believe is the case with Incineration. If economically possible then further smaller sites should be considered in the Cirencester and Forest of Dean areas to keep transportation down to the minimum.

17. Officer Response.

Comment noted. Dealing with each point in turn. In terms of a 'one-site solution', the site options consultation paper identifies 13 sites, 10 in Zone C, 3 outside Zone C. These were drawn from an initial long-list of 329 sites. With the exception of Cheltenham Borough (where no sites were available) the 13 sites consisted of sites from each of the Gloucestershire Districts. The questionnaire invited views on the suitability of these sites including whether a combination of sites from within and outside Zone C should be pursued. At the current time it is not known whether Gloucestershire's residual waste will be managed on one large site or a number of smaller sites. The Council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the County. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. The advantages and disadvantages would be investigated further during the procurement process. With regard to importing waste, the council endeavours to deliver a solution to manage Gloucestershire's residual waste, not waste from outside the county. To promote flexibility of the solution and further recycling above the minimum 60% target, the council would be open to views on the treatment of Gloucestershire's commercial waste. It is important to note that household waste is only 25% of the total waste produced by Gloucestershire. In terms of technology, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. The contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. With regard to Site 8, Nastend farm, the site has not been taken forward into the publication WCS because although the County Council is the landowner, following discussions with the County Council's Waste Disposal Authority (WDA) it would appear that there is significant uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore, the site is not

Number 10 Type IND Name John Darwent Organisation not applicable/not provided

needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 148 Type IND Name Sally Davidson Organisation not applicable/not provided

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester		X	

10. Please give a reason for your answers to Question 9.

We are very fortunate to live close to the Fosse Cross recycling centre which is extremely well run with very helpful workforce. But we are concerned that if the council decide to site an incinerator or treatment plant there our country lanes of Calmsden and its surrounds will not be able to cope with the extra traffic. Already we have litter left on the roads which we pick up as we are proud of our hamlet. We do all the recycling we can in our compost and the rest goes to Fosse Cross. We certainly don't want too much more to go into landfill but please think environmentally where the site will be.

10. Officer Response.

Comments noted. Foss Cross would not be considered suitable for a large-scale facility and would only be suitable for a small-scale facility to support a strategic network of sites. It is highly unlikely that waste would be imported to Foss Cross from outside of the AONB because the purpose of including smaller dispersed sites would be allow waste to be treated closer to its arisings and improve sustainability. At this stage, without detailed modelling, it would not be possible to say for certain how this would affect lorry movements, but there is no indication that lorry movements would be increased, it is more likely that they would be decreased. With regard to incineration it should be noted that the Council is currently technology neutral. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. This site will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 83 Type IND Name Chris Davies Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

The RSS has not been approved and ratified. (We have been promised that in the event of a change in Government next year it will be thrown out) However, even if this is the case, the JCS is proposing large new housing developments within Zone C, specifically at Ashchurch, Bishops Cleeve and Uckington. Waste Sites should not be located within urban areas as they will have a detrimental effect upon house sale and prices and will put pressure on infrastructure that is already inadequate, for example drainage and traffic congestion.

2. Officer Response.

Comment noted. The South West RSS is potentially going to be abolished. Importantly however, the evidence that informed the preparation of the RSS may still be considered a material consideration. Furthermore, despite the potential abolition of the RSS, local authorities are expected to continue to progress their own development plan documents including waste plans, with enough land being provided for waste management facilities to support the sustainable management of waste. In terms of impact on urban areas, clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. The effect of development, waste related or otherwise, on house prices, is outside the scope of the planning system.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
3. Easter Park, Ashchurch		X	

4. Please give a reason for your answers to Question 3.

In July 2007 the A46 was impassable cutting off traffic at Tewkesbury, the M5 and Northway, Ashchurch and the A46 towards Evesham. There is existing housing very close proximity and, if the JCS proposals go ahead at least 2000 more homes will be built in Ashchurch. Many businesses in Tewkesbury have closed and Tewkesbury, Northway and Ashchurch are working hard to regenerate our town which has suffered more than most following the floods and in the current economic climate. This site is valuable land which, if properly developed, will help one regeneration and could provide an excellent opportunity for a large retailer to locate here. Northway is designated a deprived area and we residents are trying hard to change that and improve this area. We believe that waste site at this location will be the final nail in the coffin.

4. Officer Response.

Comments noted. Dealing with each in turn. It is acknowledged that the severe flood event in July 2007 affected the A46 however this was an extreme event and may not occur again for several hundreds of years. The site has been subjected to a strategic flood risk assessment which confirmed that the site is located in Flood Zone 1 and is therefore at low risk of flooding. Notwithstanding its location in Flood Zone 1 if a proposal of more than 1 hectare in size were to come forward on this site, it would need to be supported by a detailed Flood Risk Assessment (FRA) in any case. PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire

Number 83 Type IND Name Chris Davies Organisation not applicable/not provided

Highways which helped to identify any key transport issues relevant to each site. Notably the highway assessment for Easter Park identified a potential decrease in traffic compared to that which could be generated under the existing planning permission for employment development. In terms of proximity to housing (new and proposed) clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. In terms of the site being used for other purposes to assist with the regeneration of the area, it is important to note firstly that the site owner is willing to consider waste management on the site and secondly that waste management itself can have economic benefits in terms of job creation and re-using previously developed land. Retail policy is outside the scope of the WCS however in broad terms, a retail use in this location would be contrary to the sequential approach advocated in Government policy which requires new shops to be located in town centres first before sites away from the town centre are considered. There is nothing to suggest that waste management facilities cannot co-exist with industrial development indeed they are acknowledged as compatible in national policy. Notwithstanding the above, the site has not been taken forward into the Publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Disagree

6. Please give a reason for your answer to Question 5.

We strongly disagree with the RSS and we formed part of the 35000+ objections to it. We are concerned however, that even if it is thrown out, the JCS are following Government and RSS guidelines in spite of huge public objection. We believe that the need has not been proven and that the infrastructure will not support it.

6. Officer Response.

Comment noted. The potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I'm not sure/I don't know

8. Please give a reason for your answer to Question 7.

Question 7 assumes that the decision has already been made by GCC that a major waste site will be located in Zone C. In your consultation document it says preferred strategy not that it has already been decided. Why consult if it's already decided.

Number 83 Type IND Name Chris Davies Organisation not applicable/not provided

8. Officer Response.

Paragraph 3.27 of the WCS Site Options consultation document states that our preferred strategy is to focus the search for strategic municipal waste sites primarily on the area we have defined as Zone C. It should be noted that this was the preferred strategy for the Site Options consultation. The purpose of the consultation was to see if the public / interested parties agreed with this approach. If, through responses to the consultation, there was a clear consensus from stakeholders including statutory consultees, Government Office etc that the preferred strategy is flawed a re-assessment of this approach may be needed. It should be noted however that 50% of respondents supported the strategy. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period and the need to manage waste close to source in line with national policy it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

10. Please give a reason for your answers to Question 9.

No knowledge of sites

10. Officer Response.

Noted.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

See answer to question 8. Is GCC asking questions in a way that leads to public to give answers that they want.

12. Officer Response.

See previous response.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No

13. Officer Response.

Noted.

14. Do you have any comments on the Executive Summary?

We would like a more considered approach rather than following the Government guidelines and a Government regional strategy duff policy which may not go ahead.

14. Officer Response.

Comment noted. The South West RSS is potentially being abolished. Importantly however, the evidence that informed the preparation of the RSS may still be considered a material consideration. Furthermore, despite the potential abolition, local authorities are expected to continue to progress their own development plan documents including waste plans, with enough land being provided for waste management facilities to support the sustainable management of waste.

15. Do you have any comments on Section 1?

No

15. Officer Response.

Number 83 Type IND Name Chris Davies Organisation not applicable/not provided

Noted.

16. Do you have any comments on Section 2?

No

16. Officer Response.

Noted.

17. Do you have any comments on Section 3?

NO

17. Officer Response.

Noted.

18. Do you have any comments on Section 4?

NO

18. Officer Response.

Noted.

19. Do you have any comments on the Sustainability Appraisal reports?

No

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

No

20. Officer Response.

Noted.

Number 251 Type IND Name Mair Davies Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

This zone runs through a highly populated area and any fumes from burning waste would be detrimental to health. It would also create traffic chaos due to large vehicles travelling through built up areas, particularly where there are schools and elderly people.

2. Officer Response.

Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10 which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. With regard to burning waste, it is important to note that the Council is currently technology neutral. Thermal treatment (incineration) is one of a number of options under consideration. With specific regard to health impact, PPS10 states that Modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health. In terms of causing traffic chaos, the sites included in the consultation paper were all subject to an initial highway assessment which considered them all to be suitable in highway terms. A further assessment will be undertaken in preparing the Publication WCS and any necessary transport related development criteria will be specified in the site allocation policy. If any of the sites are progressed to the planning application stage the proposal would need to be supported by a detailed Transport Assessment (TA).

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch		X	
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

These are obviously areas near my home and I would be concerned on several counts not least the effect it would have on property prices and local community health.

4. Officer Response.

Comment noted. Please see response to Q2.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Disagree

Number 251 Type IND Name Mair Davies Organisation not applicable/not provided

6. Please give a reason for your answer to Question 5.

I disagree with urban extensions and feel that Tewkesbury is adequately developed particularly in view of the flooding in 2007 and the added problems of building on flood planes.

6. Officer Response.

Comment noted. The Government's intention to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

I appreciate that wherever these sites are located there will be objections from local residents however I feel that they should be located in less populated areas to alleviate the health effects that could accrue and the dangers of increased heavy traffic. Roads in the Tewkesbury area are already heavily laden with traffic and peak time congestion is already a problem.

8. Officer Response.

Comments noted. Please see response to Q2.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

I have not looked into these areas.

10. Officer Response.

Noted.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I do not support the approach of using a combination of sites from within and outside Zone C

13. Are you aware of any other sites that might be suitable for treating municipal waste?

As this issue has only just been brought to my attention there has not been the time to identify other sites.

13. Officer Response.

Noted.

14. Do you have any comments on the Executive Summary?

More publicity should have been given to this important issue.

14. Officer Response.

Number 251 Type IND Name Mair Davies Organisation not applicable/not provided

Comment noted. The site options consultation was extensive, via newspapers, radio, advertising, direct mail, email, roadshows and online.

15. Do you have any comments on Section 1?

I appreciate the fact that we are all creating more waste however the retailers should take part of this responsibility and look at their unnecessary packaging.

15. Officer Response.

Comment noted. There have been a number of initiatives in this direction such as the Packaging & Packaging Waste Directive (94/62/EC) and the subsequent Packaging (Essential Requirements) Regulations 2003 (S.I. 2003 No 1941), and the County Council welcomes these. Producer responsibility is becoming a key focus in many new legislative changes. However the County Council does not make legislation so is limited in what it can do to bring about change. We do actively participate in a number of groups which lobby for changes in waste legislation such as the Local Government Association, the National Association of Waste Disposal Officers and the County Surveyors Society. We are also in regular contact with local retailers to ensure that we work as close together as possible to promote reduction and recycling messages.In addition to responding to legislative pressure, retailers and major brand owners have for the past 5 years been addressing packaging under the Courtauld Commitment. This national voluntary agreement aims to cut down on the use of packaging materials, reduce their impacts and incorporate more recycled materials into packaging. We are aware of the benefits that the Courtauld Commitment is delivering and of its importance in reducing the waste impacts of a large number of common household consumable items. Information on progress made to date is easily accessible via case studies and reports on the website of the Waste & Resources Action Programme (WRAP). In March 2010 a second phase of the Courtauld Commitment was launched. This aims to extend the programme deeper into the supply chain in order to multiply the benefits further.

16. Do you have any comments on Section 2?

When the Tewkesbury Borough Council recycling project is extended less waste should end up in the landfill areas as I am sure is the case in other areas.

16. Officer Response.

Comment noted. More recycling should lead to a reduction in the amount of residual waste that needs to be managed. There will however always be an element of residual waste that cannot be recycled or composted. The focus of the consultation is on this residual waste. This amount is predicted to be between 150,000 tonnes and 270,000 tonnes per annum.

17. Do you have any comments on Section 3?

As previously stated sites away from residential areas should be considered due to increase of heavy traffic, fumes from waste burning, vermin (including seagulls) and other unacceptable situations.

17. Officer Response.

Comments noted. Please see response to Q2. In terms of traffic, PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. In terms of fumes from waste burning it is important to note that at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line

Number 251 Type IND Name Mair Davies Organisation not applicable/not provided

with the waste hierarchy. With regard to health, Planning PPS10, states that modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health.

Number 79 Type IND Name Kevin Daws Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I am writing to register my opposition to County Council's proposal to build a Waste Incinerator in Gloucestershire. As a resident of Quedgeley I would like to make it clear that I am specifically opposed to the citing and building of a Waste Incinerator at any of the proposed sites which are: Javelin Park near to Junction 12 of the M5 Quadrant Business Park Netheridge Sewage Works I believe that the core waste strategy of Gloucestershire County Council should be based on the principles of Reduce, Reuse and Recycle Reduce the amount of waste generated through public education campaigns and encouraging businesses to reduce the amount of packaging they use including reducing the use of plastic especially carrier bags Reuse any item that can be reused for example carrier bags, bottles, boxes, etc Recycle anything that cannot be reused Any method of waste disposal needs to be as environmentally friendly as possible so the County Council should be looking at biomass and other forms of waste management that will utilise composting, biomass and other forms of recycling that allow biodegradable materials to be utilised in other ways. Landfill is the last resort and this should be reduced as the amount being reduced, reused or recycled increases. Gloucestershire County Council needs to ensure that any items deposited in landfill sites in Gloucestershire originate within the borders of Gloucestershire. We should not be importing waste from outside the area covered by Gloucestershire County Council as we are doing now. Incineration is not an option and should never be considered to be an option for at least 3 reasons: 1. To make any incinerator economically viable Gloucestershire County Council will need to import massive amounts of waste from outside Gloucestershire 2. To deliver this waste to the proposed waste incinerator will require a massive increase in the number of lorries on our roads - motorway, main roads and village roads - which will increase pollution and traffic congestion as well as increasing the repair bill for our roads. 3.More and more of Gloucestershire's waste will be burnt rather than recycled.

17. Officer Response.

Comments noted. AWith regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 452 Type MP Name Parmjit Dhanda MP Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I welcome the Gloucestershire County Council's consultation to identify future waste disposal sites across Gloucestershire as part of their waste core strategy; however I believe the whole consultation is fundamentally flawed. I am concerned the consultation is asking for comment, relating to the suitability of each of the 13 sites within the document, without detailing the waste disposal technology preferred for each site. As an example; Question 3 of the consultation questionnaire asks the responder to indicate the suitability for the treatment of waste at Land North of the Railway Triangle. The site has been used to treat commercial waste for a number of years. It may well be acceptable for this to continue, but it certainly would not be acceptable for an incinerator, burning up to 150,000 tons of residual waste a year, to be built on the site. Yet the consultation makes no consideration of this fundamental principle of different sites having different suitability. Netheridge Sewage Treatment Works in Hempsted may well be acceptable for waste disposal treatments such as in-vessel composting and anaerobic digestion, however, by just indicating the site is suitable for the treatment of household waste, could result in an inappropriate method of waste disposal being used at this site. Without the marriage of both site and technology I cannot see how this consultation will produce a fair assessment of where the most appropriate place to dispose of future waste is. It is therefore very difficult to comment and to give an accurate assessment to this consultation. However I would recommend that Gloucestershire County Council look to provide several sites for waste disposal rather than a single site - a single site is likely to result in the building of a giant incinerator. The need to cut the carbon footprint from collection to the disposal of waste is an environmental must. To transport waste outside the District where it is produced, is not environmentally good practise. The Council has a unique opportunity to completely re-think how we dispose of our future waste, lessening our dependency on landfill sites. It should embrace good practise for future generations and marry up the most appropriate technology to smaller waste sites. Smaller sites, under a programme of dispersal, will give the waste Authority far more flexibility for the future, allowing the Authority to adapt to the rapidly changing methods of waste technology. Such a policy would also provide a greater level of employment than a single centralised waste site. Under such proposals, household recycling can be further encouraged as there won't be the need to provide a single site with a large tonnage of residual waste. I hope the County Council is prepared to take on board such comments and is also able to take direction and work closely with environmental community groups who are knowledgeable in how to dispose of waste by using 'green' methods. In summary, the consultation cannot accurately identify suitable waste sites without the respondent knowing the waste technology that is to be used. Hence the consultation is fundamentally flawed. The Council should look to provide several small waste sites in a dispersal policy that should use green technologies to dispose of residual waste. The Council should also look to work with environmental groups along with the waste industry to produce a waste strategy that is fit for the 21st Century. Furthermore the Council needs to consider the progress being made by Gloucestershire University, The Cheltenham Chamber of Commerce, Martin Horwood MP and myself in the effort to develop light rail in the County, which would depend on methane production as part of anaerobic digestion. A large incinerator would wreck this progress.

17. Officer Response.

Comments welcome. Dealing with each in turn. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. With specific regard to Netheridge, the site schedule specifies that this site is likely to be suitable for Anaerobic Digestion (AD) rather than other forms of waste treatment. In terms of the number of sites, the site options consultation paper identifies 13 sites, 10 in Zone C, 3 outside Zone C. These were drawn from an initial long-list of 329 sites. With the exception of Cheltenham Borough (where no sites were available) the 13 sites consisted of sites from each of the Gloucestershire Districts. The questionnaire invited views on the suitability of these sites including whether a combination of sites from within and outside Zone C should be pursued. At the

Number 452 Type MP Name Parmjit Dhanda MP Organisation not applicable/not provided

current time it is not known whether Gloucestershire's residual waste will be managed on one large site or a number of smaller sites. The council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the County. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. The advantages and disadvantages would be investigated further during the procurement process. In terms of liaison with environmental groups, the WCS has been subjected to extensive consultation with a range of stakeholders in 2006, 2008 and 2009. With regard to the residual waste project, GCC has always met with environmental groups when an invite has been offered and has maintained an open door policy. Prior to the procurement, GCC met with several groups on a number of occasions to discuss the project and continues to do so. In addition, environmental groups, specifically, have been invited to be involved in the two consultations that GCC has held. The first, in 2007, was mainly focused on the Joint Municipal Waste Management Strategy (JMWMS), but part of the discussions at the focus groups was about residual waste and technologies. With regard to Site 7, Land North of Railway Triangle, since the site options consultation was undertaken in October 2009, the Waste Planning Authority has carefully considered all the issues related to this site. Whilst it is fully recognised that it does currently serve a useful function as a site primarily handling construction and demolition waste, it will not be taken forward as a strategic site allocation due to highways and access issues. The site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available.Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 179 Type IND Name Alan Dicks Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

It includes Javelin Park.

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

I use the gun range at area C of Wingmoor Farm West, so don't want that to be taken away. The gun club would be hard pressed to find another site as good. Also, this site is right next to the railway and might pose some danger or disruption in the future if something goes wrong. Javelin Park is near J12 of the M5 and away from houses.

4. Officer Response.

Support for Javelin Park noted. With regard to Area C, Wingmoor Farm West, this area was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the 'inclusion criteria' for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not

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recommend that his site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

6. Please give a reason for your answer to Question 5.

Let's see what happens first and then make a decision.

6. Officer Response.

Comment noted. The WCS has a role to play in ensuring all new development is underpinned by appropriate waste management infrastructure (e.g. recycling facilities). The site options consultation paper however focuses on identifying a site or sites suitable for accommodating a strategic waste management facility and there has been no interest from either waste operators or the developers leading the urban extensions in providing this type of facility as part of the development. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I'm not sure/I don't know

8. Please give a reason for your answer to Question 7.

I'm not an expert on these sites, and they wouldn't affect me.

8. Officer Response.

Comment noted.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

I don't know these sites.

10. Officer Response.

Comment noted.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I'm not sure/I don't know

12. Please give a reason for your answer to Question 11.

As I said, I don't know the proposed sites.

Number 179 Type IND Name Alan Dicks Organisation not applicable/not provided

12. Officer Response.

Comment noted.

Number 453 Type BUS Name Simon Dodd Organisation European Metal Recycling Ltd.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
6. Land at Moreton Valence	X		

4. Please give a reason for your answers to Question 3.

We have three sites within the area covered by the waste plan. These are: a) the EMR Ferrous Metal scrap yard business at Byard Road off Bristol Road Gloucester GL2 5DF. b) the former Mountstar Non Ferrous scrap metal processing yard at The Old Airfield, Moreton Valence GL 2 7NG and c) The export shipping quay at The Docks, Sharpness, Berkeley GL13 9UX We find from experience that the most practical approach is to allow new sites to be adjoining or to be extensions of existing waste sites. The neighbours have experience of such operations. There are also often mutual benefits in sites being along side each other and in certain cases what is a waste / by product of one process is the raw material for the adjoining business. However we agree that the allocation of new sites should be in the area of major populations. You will note that we have a site immediately adjoining the Moreton Valence site 6. We would therefore welcome this adjoining land as suitable for being allocated for waste uses.

4. Officer Response.

Comments noted. The re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community. Support for Site 6: Land at Moreton Valence noted.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

Behind our site at Byard Road in St Albans Road Gloucester is a former Gas Works site that we feel is very suitable for waste or Industrial uses. Possibly in some form of building. We would suggest this as a possible alternative.

13. Officer Response.

Comment noted. The former gas works site had technical assessments carried out on it (Site ref 532), but for issues related to deliverability and flood risk, the site was not carried forward into the consultation document.

17. Do you have any comments on Section 3?

Our main issue nationally is the potential for conflict to arise between the operators of a waste facility and occupiers of adjoining new residential developments. Without adequate protection measures the long term operation of the waste facility may be compromised. In the light of the EU and Government Directives setting targets for the reduction of landfill and an increase in recycling the importance of the sites will increase. If our facilities are not available the objectives set by these directives will not be achieved. We are concerned that developers are increasingly applying for residential planning permission for schemes which often includes / or immediately adjoins our depots without making specific provision to provide for the need for; a) alternative facilities or b) adequate mitigation measures to minimise any potential conflict that can arise when residential occupiers adjoin a waste site. Indeed we have particular concerns that National Grid the owner of the land immediately adjoining our site at Bristol Road Gloucester has aspirations to build houses on his site. We would most strongly support the proposed use of the site for employment. Any residential development immediately behind our site can only prejudice our and other businesses on the estate. Indeed we have approached them on severall occasions expressing an interest in buying some of this land. We are aware of many sites where they have been able to finance the costs of any remediation from such a use and we see no requirement for them to achieve the higher value residential use to finance such remediation here. European Metal Recycling Limited is one of the world's largest metal recycling companies (the largest in the UK) and handles over ten million tonnes of scrap a year. You will appreciate that our yards primarily handle scrap brought in or collected from firms, councils and individuals in their respective areas. Many deliveries brought in are relatively small loads which people will not transport far. We have found that we need to have depots to service the needs of each local market and therefore

Number 453 Type BUS Name Simon Dodd Organisation European Metal Recycling Ltd.

in the South West we also have sites at Swindon, Cardiff, Yeovil and Plymouth as well as the sites listed above. We provide an essential service for both the public and private sector processing a wide variety of waste metal products. Much of the scrap is processed on site to produce a finished furnace ready product. Examples of metal streams processed at our sites include; Local Authority civic amenity and Incinerator scrap. End of Life Vehicles (ELVs) Waste electrical and electronic equipment (WEEE) Packaging materials Demolition Scrap Cuttings and turnings from manufacturing businesses. You will be aware that; a) Local authorities have targets set for recycling and EMR's operation helps to fulfil these targets. b) The acquisition of scrap metals ensures that there is efficient recycling is achieved and is a helpful source of income for local businesses. c) By providing waste recycling facilities the dumping of cars, fridges and redundant items can be avoided. d) There are considerable savings in energy and reduced CO2 emissions in using recycled materials. I subsequently moved on to reviewing the papers for the Gloucester Joint Core Strategy's part of preparing my comments. I was able in fact to establish that there is a proposal to zone the land behind our site for housing. I enclose a copy of the representation that I have made and would urge you to point out the need to protect an established and important waste site from inappropriate adjoining developments.

17. Officer Response.

Comments noted. It is pertinent to note that the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Providing waste facilities in urban areas is also consistent with national and regional policy concerning the management of waste close to source. With regard to the Transco site on Bristol Road, the potential future redevelopment of the site is outside the scope of the WCS. Whilst the WCS will include an appropriate policy to safeguard existing waste facilities it cannot safeguard adjoining sites. The decision on whether or not to grant permission for new development on the Transco site would fall with Gloucester City Council who would need to satisfy themselves that the proposal would have no unacceptable impact on existing occupants.

Number 36 Type IND Name Peter G Dodson Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
2. Areas A, B & C at Wingmoor Farm West		X	

4. Please give a reason for your answers to Question 3.

I wish to protest most strongly regarding the possible use of Area C ,Wigmoor Farm West, for the use of the treatment of waste. This land has been used successfully for many years by Cheltenham and District Clay Club Clay. To remove this facility would curtail the enjoyment of many people who pursue a sport recognised at World and Olympic level. The UK has contributed many champions in Clay Shooting disciplines both at the Olympics and World events, names such as George Digweed and Richard Faulds being prominent. The latter being coached by a local shooting expert who also manages the Olympic Trap shooting team. The alternative usage of this land thereby removing the clay shooting facility must be resisted at all costs and I encourage you to continue allowing the current usage to remain.

4. Officer Response.

Comments noted. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the 'inclusion criteria' for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that his site is taken forward as a formal strategic allocation for waste management in the Publication WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 107 Type IND Name Marguerite Doubleday Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I write to object to the use of all 13 of the sites listed for possible waste treatment in Gloucestershire on the grounds that: a.. Any of these sites could be used for incineration, which I oppose. b.. Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. c.. I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. d.. The long term costs to the taxpayer will be higher with incineration. e.. Incinerators act as a disincentive to reduce, reuse and recycle. f.. The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas. g.. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. h.. Large incinerators in other areas of the country are already deemed to be a mistake.

17. Officer Response.

With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 121 Type PC Name Hilary Dowdswell Organisation Cainscross Parish Council

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

As society is continually creating waste which needs to be dealt with, a solution must be found. Landfill will run out and become progressively expensive for taxpayers.

2. Officer Response.

Comment noted. The Publication WCS recognises that landfill will continue to play a role for disposal of certain wastes but seeks to reduce the county's reliance on it as the primary method of waste management.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre	X		
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

We can only comment on sites relevant to Cainscross Parish Council. Regarding No 8: Stroudwater Business Park, we feel this potential site is too close to the town of Stonehouse and the potential plan for tourism on the Stroudwater Canal.

4. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10 which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. The proposal is considered to have no direct relationship with tourism on the Stroudwater Canal.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

Number 121 Type PC Name Hilary Dowdswell Organisation Cainscross Parish Council

6. Please give a reason for your answer to Question 5.

It is more sustainable to treat waste near to its source.

6. Officer Response.

Support noted. The WCS has a role to play in ensuring all new development is underpinned by appropriate waste management infrastructure (e.g. recycling facilities). The site options consultation paper however focuses on identifying a site or sites suitable for accommodating a strategic waste management facility and there has been no interest from either waste operators or the developers leading the urban extensions in providing this type of facility as part of the development. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I do not support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

You have stated that Zone C avoids the River Severn flood plain and the AONB

8. Officer Response.

Comment noted. Zone C does avoid floodplains and AONB. Of those sites outside Zone C only Foss Cross is located in the AONB and this accommodates an existing waste facility. None of the sites are in a flood risk area. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

We can only comment on sites relevant to Cainscross Parish

10. Officer Response.

Noted.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I do not support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

Please see question 8

12. Officer Response.

Number 121 Type PC Name Hilary Dowdswell Organisation Cainscross Parish Council

See previous response.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No

13. Officer Response.

Noted.

14. Do you have any comments on the Executive Summary?

Useful

14. Officer Response.

Support noted.

15. Do you have any comments on Section 1?

It has clarified the purpose of the consultation

15. Officer Response.

Support noted.

16. Do you have any comments on Section 2?

Highlights the implications if we do nothing.

16. Officer Response.

Support noted.

17. Do you have any comments on Section 3?

Informative

17. Officer Response.

Support noted.

18. Do you have any comments on Section 4?

No

18. Officer Response.

Noted.

19. Do you have any comments on the Sustainability Appraisal reports?

It appears that the report covered most issues affecting the feasability of the sites.

19. Officer Response.

Support noted.

20. Do you have any comments on the Habitat Regulations report?

Cannot access this file online.

20. Officer Response.

Comment noted. The HRA Screening Report was available with all the other consultation documents on the Council's website, at all District Council Offices and local

Number 121 Type PC Name Hilary Dowdswell Organisation Cainscross Parish Council

libraries and on request.

Number 185 Type MP Name David Drew Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

The Waste Strategy should seek dispersed solutions in order to iminise waste, maximise recycling and encourage the development of 'new' technologies. Populations must be directly involved in the waste process so centralisation is wrong. Incineration must be ruled out as a possible solution. WDA must be linked to WCA for a more integrated arrangement.

2. Officer Response.

Comments noted. The Council is actively promoting increased waste reduction, re-use and recycling. The Council's target of at least 60% by 2020 is 10% higher than the national target of 50% over the same period. However there will always be an element of leftover or residual waste that needs to be managed. The site options consultation paper identifies 13 potential sites drawn from an initial list of 329 sites. Views were sought on whether a combination of sites should be used, not necessarily a single-site solution. The council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the county. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. The advantages and disadvantages would be investigated further during procurement process. With regards to incineration, the Council is currently technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. The County Council as Waste Disposal Authority (WDA) is linked to the various District Waste Collection Authorities (WCA) through the Gloucestershire Waste Partnership and the Joint Municipal Waste Management Strategy.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X

Number 185 Type MP Name David Drew Organisation not applicable/not provided

9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

It is impossible to answer this as I do not agree with the amounts of waste being proposed for a small number of sites. If dispersal was chosen instead then it might be possible to evaluate a wider number of sites and to rank them for suitability.

4. Officer Response.

Comment noted. The Publication WCS focuses on Zone C identifying four strategic site allocations within this area. On balance having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

6. Please give a reason for your answer to Question 5.

But this must not be at the cost of a wider search for potential sites which will include rural areas. This will allow waste dispiosal to be as close to population as possible notwithstanding the need to recognise that processes such as anaerobic digestion and in-vessle composting cannot be next to residences.

6. Officer Response.

Support noted. The WCS has a role to play in ensuring all new development is underpinned by appropriate waste management infrastructure (e.g. recycling facilities). The site options consultation paper however focuses on identifying a site or sites suitable for accommodating a strategic waste management facility and there has been no interest from either waste operators or the developers leading the urban extensions in providing this type of facility as part of the development. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead their waste management requirements will be addressed through the general policies and requirements of the Waste Core Strategy. With regard to sites in rural areas, the publication WCS allows for such proposals to come forward where there is market interest, subject to compliance with relevant criteria.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

This is to maximise the number of sites thus allowing a dispersal strategy to function.

8. Officer Response.

Support noted. Whilst the focus of the publication WCS is Zone C, proposals may come forward outside this area subject to relevant criteria.

10. Please give a reason for your answers to Question 9.

Not applicable as all answers subject to dispersal strategy.

10. Officer Response.

Comment noted. See previous response to Question 8.

Number 185 Type MP Name David Drew Organisation not applicable/not provided

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

For the reasons I have already identified.

12. Officer Response.

Support noted. See previous responses.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

Why are there no sites identified in the south of the Stroud District and in other District Council areas?

13. Officer Response.

All sites within the county which met the initial 'inclusion criteria' outlined in Technical Evidence Paper WCS-N were considered. Some of the very southern areas of Stroud District fell outside of the 16km criteria and no further work was undertaken on sites in this area However, 110 sites (across all 6 districts and including sites in the Cam/Dursley area had technical assessments carried out on them. Please refer to Technical Evidence Paper WCS-N for further details.

14. Do you have any comments on the Executive Summary?

No

14. Officer Response.

Noted.

15. Do you have any comments on Section 1?

No

15. Officer Response.

Noted.

16. Do you have any comments on Section 2?

Again I re-iterate that the approach should be one of dispersal and we should rule out incineration.

16. Officer Response.

Comment noted. See previous response in relation to dispersal of waste facilities. In terms of incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.

17. Do you have any comments on Section 3?

Why are two of the sites highlighted in the Stroud area - four in all - owned by the County Council. This is highly suspicious and leads to dubious logic in terms of getting the site and then bringing it forward for waste uses. I cannot understand how Nastend Farm is described as having good access. How is this possible? To me

Number 185 Type MP Name David Drew Organisation not applicable/not provided

the Farm is only accessible through very narrow lanes, unless access is going to be through the district's major industrial estate?

17. Officer Response.

Comment noted. An initial long-list of 329 sites was identified which was subsequently reduced to 13 sites on the basis of a number of factors, one of these being availability or deliverability. The two Council owned sites were included because they met all other requirements (e.g. site size, outside the floodplain, acceptable in highway terms etc.) and are available. With regard to Site 8, Nastend farm, the Waste Planning Authority has carefully considered all the issues on this site. The site has not been taken forward into the publication WCS because although the County Council is the landowner, following discussions with the County Council's Waste Disposal Authority (WDA) it would appear that there is significant uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore, the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

18. Do you have any comments on Section 4?

It would be good to know what limitations the PFI process put on site selection and technology adoption. Likewise it would be good to see what plans there are for a genuinely integrated WDA/WCA. Timescale remains highly questionable. Public involvement should be spelt out far more quickly and there should be a much greater attempt to expand public participation.

18. Officer Response.

Although the WCS and the PFI residual waste project are inter-related, the residual project has had no bearing on the site selection process feeding into the preparation of the site options consultation paper. An initial long-list of sites (329) was drawn up based on a range of factors including a call for sites exercise, existing waste management facilities, local plan employment allocations, employment land reviews and so on. Various factors were then used to reduce the list of sites to 110. It is important to note that the sites are not intended solely for municipal waste but also for commercial and industrial waste as explained in the consultation paper. The County Council in its role as WDA (Waste Disposal Authority) works in partnership with the District Councils in their role as WCA (Waste Collection Authorities) through the GWP (Gloucestershire Waste Partnership). The potential for integrating the functions of the WDA and WCA is outside the scope and remit of the WCS. With regards to timescale, it is unclear whether the comment concerning its accuracy relates to the residual project or the WCS. All information provided in the site options consultation paper is based on the latest information available at the time of writing. Public consultation on the WCS site options consultation has been extensive and in line with the Council's adopted Statement of Community Involvement (SCI).

19. Do you have any comments on the Sustainability Appraisal reports?

No.

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

No.

20. Officer Response.

Noted.

Number 240 Type IND Name W Drinkwater Organisation not applicable/not provided

17. Do you have any comments on Section 3?

It is with some dismay that I hear that Gloucestershire County Council has identified Area C at Wingmoor Farm East as a potential site for the treatment of waste. This site is home to the Cheltenham & District Clay Club and on a personal level as club member for over 15 years I have enjoyed many happy hours during my retirement in the company of shooters within an organised shooting ground. The committee and many volunteers have spent time and energy improving the whole site and club house with landscaping and the planting of over 400 trees. At a time when the government is requesting more leisure time activities, this acquisition would remove a facility shared by young and retired people alike. I also feel for the residents of Bishops Cleeve and Stoke Orchard surely they have enough landfill and waste sites already. Consideration must be given to families growing up in this area and the possible long term effects.

17. Officer Response.

Comments noted. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the inclusion criteria for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that this site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS national policy and any other material considerations.

Number 298 Type IND Name M Driver Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I write to oppose incineration as a means of refuse disposal. Far more environmentally beneficial methods, such as anaerobic digestion, have been developed and used successfully in more enlightened countries, such as Germany and Scandinavia. There are many reasons to oppose incineration all based on reducing the threat to the environment. Incineration creates fly ash residue which is toxic and will have to be transported away for burial, creating risks in transit and to residents in the area of the burial site. In order to feed an incinerator, huge amounts of waste will have to be brought in to keep it in constant operation. Apart from the negative aspect of this transportation, it will also reduce the incentive to recycle. Apparently the incinerator contract will be for at least 24 years locking us into this method of waste disposal, regardless of the development of more environmentally beneficial systems which will certainly evolve. It is a system which is rapidly becoming obsolete and indeed has been deemed to be a mistake in other areas if this country, where several incinerators have been shut down incurring a huge loss of taxpayers' money. I trust you will give these issues your most serious consideration.

17. Officer Response.

Comments noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. Notably Germany, which is referred to in the representation incinerate around 60% of their municipal waste (source: Eurostat 2007). In terms of contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. GCC recognises that regardless of the type of solution proposed, it is important that the solution must be able to cope with changes in waste volumes and composition, as it is inevitable such changes will happen. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. Flexibility is a separate sub-criterion within Operational, Service and Technical Deliverability. This will be addressed throughout the process and is recognised as a key factor for the project.

Number 200 Type IND Name Robert Duncan Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
7. Land north of Railway Triangle, Gloucester		X	

4. Please give a reason for your answers to Question 3.

Residental area, import of waste from outside gloucester, unsuitable roads, current problems from the site not managed, undesirable effect on surrounding properties, pollution will effect nearby schools and hospital, noise pollution, local people totally against.

4. Officer Response.

Comments noted. With regards to the importation of waste from outside Gloucester the provision of a waste management facility at Gloucester or Cheltenham is consistent with national and regional policy. This is where most waste in Gloucestershire is generated and it is essential that it is managed as close to source as possible. Transport movements from further afield across the rest of Gloucestershire will be minimised through the use of appropriate bulking and transfer facilities. The council endeavours to deliver a solution to manage Gloucestershire's residual waste, not waste from outside the county. To promote flexibility of the solution and further recycling above the minimum 60% target, the council would be open to views on the treatment of Gloucestershire's commercial waste. It is important to note that household waste is only 25% of the total waste produced by Gloucestershire. In terms of impact on surrounding properties, clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Notwithstanding the above, the site has not been taken forward into the Publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Agree

6. Please give a reason for your answer to Question 5.

Number 200 Type IND Name Robert Duncan Organisation not applicable/not provided

not enough green areas in locality, new housing should be targeted on more rural sites.

6. Officer Response.

Support noted. The WCS has a role to play in ensuring all new development is underpinned by appropriate waste management infrastructure (e.g. recycling facilities). The site options consultation paper however focuses on identifying a site or sites suitable for accommodating a strategic waste management facility and there has been no interest from either waste operators or the developers leading the urban extensions in providing this type of facility as part of the development. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

too much development in the two main areas without infastructure in place.

8. Officer Response.

Support noted. On balance however, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

don't know these areas well enough to comment.

10. Officer Response.

Noted.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I'm not sure/I don't know

12. Please give a reason for your answer to Question 11.

any site should be well away from residential areas.

12. Officer Response.

Comment noted. See previous response to Question 4 in relation to the impact on residential areas.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

Number 200 Type IND Name Robert Duncan Organisation not applicable/not provided

no but I am sure that whichever is chosen it will be well away from where any officers of gcc live.

13. Officer Response.

The sites were selected following a due process based upon PPS10. Please refer to Technical Evidence Paper WCS-N. Four strategic sites have been allocated within Zone C. Other sites will be considered on their merits having regard to relevant criteria.

14. Do you have any comments on the Executive Summary?

I think you have already made your mind up for the site and you are simply going through the motions as consultation is done on your terms.

14. Officer Response.

Comment noted. The responses received in response to the consultation have been used alongside further technical work to determine the sites that have been included in the publication WCS. Whilst Javelin Park has been identified as the Council's reference site for its residual waste project, a site had to be identified in order to secure PFI funding. Following the decision by Defra in October 2010 to withdraw Gloucestershire County Council's Private Finance Investment (PFI) credits (worth £92million), the council is currently carrying out a strategic review of the project. The outcome from the review will be considered by Cabinet in February 2011. Ultimately Gloucestershire County Council has to find an alternative to landfill. Doing nothing is not an option.

15. Do you have any comments on Section 1?

no

15. Officer Response.

Noted.

16. Do you have any comments on Section 2?

no

16. Officer Response.

Noted.

17. Do you have any comments on Section 3?

they should be kept well away from residental areas.

17. Officer Response.

Comment noted. See previous response to Question 4 in relation to the impact on residential areas.

18. Do you have any comments on Section 4?

should not involve disruption to the local people.

18. Officer Response.

Comment noted. See previous response to Question 4 in relation to the impact on residential areas.

19. Do you have any comments on the Sustainability Appraisal reports?

no.

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

no.

Number 200 Type IND Name Robert Duncan Organisation not applicable/not provided

20. Officer Response.

Noted.

Number 446 Type BUS Name Paul Duncliffe Organisation P.E. Duncliffe Limited

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
7. Land north of Railway Triangle, Gloucester	X		

4. Please give a reason for your answers to Question 3.

Our clients support the identification and allocation of this site in the WCS. Of all the sites that have been identified in Zone C, this site is located closest to the centre of waste arisings. RSS Draft Policy W2 makes clear that waste facilities should be located within SSCT's, or if that is not practicable, on the edge, or if not practicable, in 'close proximity' to the urban area primarily served by the facility. Part of the site that has been identified in the WCS is already in operation as a Waste Transfer Station and has planning permission and an Environmental Permit for a wide variety of waste streams with an authorised annual throughput tonnage of 75,000. Allstone do not agree with some of the site appraisal elements shown on pages 42 and 43 of the WCS. It is not accepted that (potentially) the site may not be suitable to deliver a one site solution. The rationale that the site may not be suitable to deliver a one site solution appears to be based on an alleged net increase in traffic. There are a number of existing authorised industrial uses that occupy various parts of the site, including a concrete batching facility. The traffic generated by those uses (which are likely to be displaced) would need to be taken into account - this does not appear to have been taken into account. For example, the concrete batching facility currently generates in excess of 50 heavy goods vehicle movements each day. Allstone's aggregates business also generates in excess of 50 heavy goods vehicles movements each day. Those two uses in isolation would generate a figure significantly in excess of the residual 150,000 tonnes waste requirement identified in the WCS. Access to and from the strategic road network is not difficult. The site is located in an urban environment and all of the approach roads are more than adequate to accommodate the traffic associated with all waste types. Indeed, the current approved Waste Transfer Station use involves waste carrying vehicles, including bulkers. It is not accepted that the site is likely to have a significant impact on numerous residential properties. The question of residential amenity impact was considered in the context of the original Public Inquiry that established the Waste Transfer Station. The Inspector was quite satisfied that the use would not have an adverse impact on residential amenity considerations. It is noted under the heading 'Sensitive receptors', reference is made to additional proposed housing close by, Gloucester Royal Hospital, Schools and NHS buildings. The position is that all of these land uses are within an urban environment and are already in close proximity to not only a well established Waste use but also other industrial uses. Allstone do not accept that the use of the site for waste related purposes (as is currently operational) would have any adverse impact on any interest of acknowledged importance. Given the amount of new development that the SSTC's (Gloucester and Cheltenham) are likely to accommodate in the coming years (including strategic urban extensions) the focus for any new waste facilities should relate to those locations closest to waste arisings. The site that is owned by Allstone is ideally located at the centre of waste arisings. It is suggested that reference should be made in the WCS to those sites within Zone C that are closest to the generation of waste arisings. This is important in terms of graining a better understanding of the likely levels of C02 emissions and additional trip mileage generated by those sites in Zone C that are furthest away from waste arisings. Unfortunately the site appraisal details for this site have overlooked the potential that exists for waste related rail connection. Allstone's landholdings provide an opportunity for connection to the main railway network, as the site has a rail heading available. None of the other sites identified within Zone C provide this opportunity. Allstone consider that the WCS should provide maximum opportunity for future transportation opportunities as is acknowledged on page 8 of the WCS. In terms of waste throughput, the current Allstone waste transfer station has an authorised capacity of 75,000 tonnes per annum (currently operating at circa 60,000 tpa) operating from an area of circa 1.2 hectares. The total Allstone landholding exceeds 5 hectares and the Company do not consider that there would be any difficulty in accommodating a minimum of 150,000 tonnes of municipal waste per year. That throughput figure translates to about 35 - 40 hgv trips per day. Allstone do not consider that this level of traffic generation is excessive in an urban environment, especially when taken in the context of the traffic generation associated with the existing authorised uses on the site, which are in the magnitude of 100 trip movements per day (aggregates business and concrete batching facility only).

4. Officer Response.

Support for Zone C is noted, and the benefits, in terms of the reduction of C02 emissions as a result of sites being close to arisings is recognised. It is recognised that

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the existing site has planning permission and environmental permitting for waste and that the permitted annual throughput tonnage of waste is 75,000 tpa. The site has not been taken forward into the publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

Allstone broadly support the potential for a 'combination approach' but much would depend on the precise location of the waste facilities utilised in such an approach. The emphasis, in accordance with National and Regional Planning Policy should be to concentrate on sites within the SSTC's and not outside them. It is also suggested that the strategic site selection process should be 'in step' with the patterns of development that emerge in response to the RSS. That is particularly important and highly relevant given the need to ensure that waste sites are located in the most sustainable locations.

12. Officer Response.

Comments and support noted. Whilst the Council's preferred strategy is to provide strategic waste management facilities within Zone C, there is likely to be a role for sites outside this area e.g. smaller scale provision or supporting infrastructure e.g. waste transfer. On balance having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the publication Waste Core Strategy (WCS). It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the Waste Core Strategy (WCS) national policy and any other material considerations.

17. Do you have any comments on Section 3?

Whilst the general approach to the identification of strategic facilities, as set out in the WCS, is supported, a number of sites are some distance from the main areas of waste arisings (for example Javalin Park) and do not take into account the emerging patterns of development that are likely to materialise in the context of the RSS (if it is approved). Locating strategic waste facilities some distance from the main areas of waste arisings is not sustainable, especially given RSS draft Policy W2. Significant additional vehicle movements would need to be made, which substantially adds to C02 emissions and overall cost factors. In addition to identifying facilities for Municipal Waste, the concept of a one site solution to include other waste related uses (for example C & D and C & I) is supported. However, again, a

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number of the strategic sites identified are some distance from the major arisings of such waste streams and would impose significant additional costs, compared with those sites that are 'urban focussed'. A one-site solution should provide a location which offers maximum accessibility to the population. Locating 'strategic' sites outside of Gloucester City's administrative boundary is either practicable or sustainable. Furthermore, encouraging additional vehicles to use the M5 Motorway to access strategic facilities (which is likely to occur) is not in accordance with Highway Agency Policies which seek to reduce 'local' use of the Motorway network.

17. Officer Response.

Support noted. Whilst some sites are closer to the urban areas than others all those within Zone C are considered to be in close proximity. It is pertinent to note that the emerging patterns of development set out in the RSS have been placed in doubt with the potential abolition of that strategy. In terms of a one-site solution, at the present time it is not known whether residual waste treatment in Gloucestershire will be based on one or more sites. The site options consultation paper identifies a range of sites to provide an appropriate degree of flexibility. The council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the county. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. The advantages and disadvantages would be investigated further during procurement process. In terms of motorway access, PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan.

Number 87 Type IND Name Dennis and G Eddy Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I am writing to object to the creation of all 13 sites proposed for possible waste treatment in Gloucesteshire on the grounds that . 1. Mechanical Biological Treatment (including Anaerobic Digestion) technologies is now a proven alternative that better satisfies the criteria you are obliged to use, is better for the environment and the taxpayer. 2. I understand that incineration contracts will be for at least 24 years, locking the County into a solution which does not take account of the expected reduction of waste nor of any newer more efficient and effective technologies which are being rapidly developed. 3. Any of these proposed sites could be used for incineration which I strongly oppose. 4. Incineration creates fly ash residue which is toxic, this has to be transported and buried creating further danger and risk which is unacceptable. 5. The long term costs to the taxpayer and environment is to high. 6. Incinerators act as a disincentive to reduce reuse and recycle. 7.The sites are not evenly distributed around the County, giving too little weight to the negative aspect of transporting waste . The recycling policy of this County still has a long way to go and room to improve. Take a look at Redditch as an example. Over and above the normal tins and paper etc, Households can recycle ALL plastics including yogurt pots fresh meat trays etc plus all card-boards including Tetrapacks! from the doorstep. We don't even get cardboard collected? Our landfill in Hempstead has taken massive amounts from Bristol are we going to incinerate Bristol's rubbish as well.

17. Officer Response.

Comments noted. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 342 Type IND Name Peter Edis-Bates Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Many of the concepts in defining Zone C seem logical, but why confuse the issues, why not just focus on the criteria against which the decision which the decision will be made: e.g. Minimise the visual impact on Glos Residents, Minimise the refuse treck mileage, Maximise the energy generated & used, minimise life-cycle cost to tax payers etc etc

2. Officer Response.

Comment noted. It is essential that the WCS provides a clear spatial strategy concerning the location of new waste management facilities. The designation of Zone C is consistent with national and regional policy and reflects the fact that most of Gloucestershire's waste is produced at Gloucester and Cheltenham. The sites contained in the site options consultation document were identified having regard to a range of factors including landscape impact and highway linkages. These issues will be further considered through the planning process should a detailed proposal come forward. Issues such as lifecycle cost to taxpayers are outside the scope of the WCS and fall within the scope of the Council's residual waste project. The amount and type of energy generated will depend on the technology employed and at the present time the Council is technology neutral. The importance of utilising heat and power recovered from waste treatment has been detailed in a specific CHP technical evidence report and is fully acknowledged and will be reflected in the Publication WCS.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X		X
4. Javelin Park, Haresfield		X	
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			

4. Please give a reason for your answers to Question 3.

1,2,6,10 seem to be away from residential areas, land that is already spoilt (low amenity value). Not too far from centres of population 3,9 I'm not familiar with. Seem to be in populated areas. 4,5,7,8 seem very poor options. 4,5,7 are already brownfield sites making them slightly more favourable than 8 (nastend) which is beautiful untouched farmland near beautiful villages. It would be irresponsible to loose this beautiful piece of Gloucestershire forever to industrial use with a chimney visible from all the nearby villages.

4. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10 which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies

Number 342 Type IND Name Peter Edis-Bates Organisation not applicable/not provided

should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. With regard to Site 8, Nastend farm, the site has not been taken forward into the Publication WCS because although the County Council is the landowner, following discussions with the County Council's Waste Disposal Authority (WDA) it would appear that there is significant uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore, the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Agree

6. Please give a reason for your answer to Question 5.

PROVIDED that the scheme is made to look 'non-industrial' and the process is chosen that generates spare heat and power. These users of 'waste heat' could benefit. you should work hard to maximise the efficiency of the process and generate useful and profitable 'waste' heat and power.

6. Officer Response.

Support noted. The WCS has a role to play in ensuring all new development is underpinned by appropriate waste management infrastructure (e.g. recycling facilities). The site options consultation paper however focuses on identifying a site or sites suitable for accommodating a strategic waste management facility and there has been no interest from either waste operators or the developers leading the urban extensions in providing this type of facility as part of the development. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

Zone C seems to be some arbitrary, academic, administrative division. Lets just choose the best site on its merits

8. Officer Response.

Disagree. Zone C is not arbitrary. It is essential that the WCS provides a clear spatial strategy setting out what should be built and where. See previous comments.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney	X		
3. Land at Lydney Industrial Estate, Lydney	X		

Number 342 Type IND Name Peter Edis-Bates Organisation not applicable/not provided

10. Please give a reason for your answers to Question 9.

They seem to meet the criteria, except perhaps the extended transport one. If this could be minimised (use rail? use very large trucks? use river?) they should be considered.

10. Officer Response.

Comment noted and the WPA have considered sustainable transport options associated with these sites. Although the preferred focus for strategic waste management is Zone C, a number of other sites were identified outside this zone in the Forest of Dean and Cotswold District in order to provide suitable flexibility and support for the Zone C sites. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

Why are we hung up on all this Zone C logic? Lets just do the best to match the criteria. you should be focussing on the CRITERIA and their WEIGHTING and not some diversionary zone concept

12. Officer Response.

Comment noted. See previous responses in relation to the strategic importance of Zone C.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No

13. Officer Response.

Noted.

14. Do you have any comments on the Executive Summary?

look, this is not about how well you're doing your job. Its about how good a decision we make. Stop being so inward facing an think of your CUSTOMERS i.e the good people of Gloucestershire

14. Officer Response.

Comment noted. Questions 14 to 20 of the consultation questionnaire were devised to allow respondents an opportunity to provide any general comments and observations they wished to make on each section of the document.

15. Do you have any comments on Section 1?

as above

15. Officer Response.

Comment noted. Questions 14-20 of the consultation questionnaire were devised to allow respondents an opportunity to provide any general comments and observations they wished to make on each section of the document.

16. Do you have any comments on Section 2?

Number 342 Type IND Name Peter Edis-Bates Organisation not applicable/not provided

as above

16. Officer Response.

See previous responses.

17. Do you have any comments on Section 3?

as above

17. Officer Response.

See previous response.

18. Do you have any comments on Section 4?

as above

18. Officer Response.

Comment noted. The WCS is required to address the issue of deliverability, indeed it is one of the key tests of soundness that will be used by the Planning Inspectorate in assessing the WCS. It is therefore imperative that the WCS includes a delivery framework setting out how policies and proposals will be delivered in practical terms so that if they are failing to deliver or are having unintended consequences, appropriate action can be taken e.g. policy revised or replaced. Comments received on the merits of the approach proposed in Section 4 and Appendix 4 and 5 will be used to develop the framework for inclusion in the Publication WCS.

19. Do you have any comments on the Sustainability Appraisal reports?

as above

19. Officer Response.

Comment noted. Questions 14 to 20 of the consultation questionnaire were devised to allow respondents an opportunity to provide any general comments and observations they wished to make on each section of the document.

20. Do you have any comments on the Habitat Regulations report?

The most important habitat is for homo-sapiens. Please don't damage beautiful Gloucestershire during your term in post. Ask the goos people of Gloucestershire what really important to thyem and evaluate that carefully. My criteria would be: 1. Make the installation as beautiful/acceptable to max number of residents as possible - weight 70% 2. Generate the least additional road traffic - weight 10% 3. Minimise running cost by using heat & power & other good management - weight - 10% 4. Minimise capital cost - weight - 10%

20. Officer Response.

Comment noted. Strong environmental protection leading to a cleaner environment is clearly beneficial both for people and other animal and plant species. The Habitat Regulations Assessment (HRA) seeks to protect sites which are of exceptional importance in respect of rare, endangered or vulnerable habitats and species within the member states of the European Union. The site selection process as a whole considers the potential impact on people and their environment. The suggested criteria (visual impact, traffic, heat and power) are all factors that will be taken into account during the planning process. The issues of site management and cost are matters for the residual waste procurement process.

Number 213 Type WOP Name Bill Edwards Organisation Environmental Waste

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I'm not sure/I don't know

2. Please give a reason for your answer to Question 1.

dont know the area and dont live there

2. Officer Response.

Comment noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

dont know the area and dont live there

4. Officer Response.

Noted

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

6. Please give a reason for your answer to Question 5.

dont know the area and dont live there

6. Officer Response.

Comment noted.

7. Do you support the identification of sites outside Zone C?

I'm not sure/I don't know

8. Please give a reason for your answer to Question 7.

dont know the area and dont live there

8. Officer Response.

Comment noted.

Number 213 Type WOP Name Bill Edwards Organisation Environmental Waste

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

dont know the area and dont live there

10. Officer Response.

Noted

11. Do you support the approach of using a combination of sites within and outside Zone C?

I'm not sure/I don't know

12. Please give a reason for your answer to Question 11.

dont know the area and dont live there

12. Officer Response.

Noted.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

HWRC sites and bring sites massively increase throughput before planning any new sites or you will tie yourselves into contracts that are vestiges of futurebehaviour systems

13. Officer Response.

Comment noted. The site options consultation focuses on sites suitable for waste treatment, it does not deal with household recycling centres or bring sites. Core Policy WCS2 of the publication WCS sets out the Council's policy approach towards these other facilities.

14. Do you have any comments on the Executive Summary?

No

14. Officer Response.

noted

15. Do you have any comments on Section 1?

No

15. Officer Response.

noted

16. Do you have any comments on Section 2?

You cannot base your plan on your current waste arisings total or its composition as it is a massively changing statistic. Most of your waste is coming from retailers who are now ahead of your game. It suits large waste companies and consultants to let you believe things will remain the same and that you need to sign up to long term contracts at hundreds of pounds per ton. Dont do it. Improve your recycling and reuse before signing anything and consult with your retailers whom want and

Number 213 Type WOP Name Bill Edwards Organisation Environmental Waste

need to help you. You have more in common with them than waste companies at present and their new trends will dictate yours.

16. Officer Response.

Comment noted. Whilst it is acknowledged that waste arisings are a 'movable feast' it is possible to forecast future arisings based on previous trends and likely future growth in housing and employment levels etc. GCC continually reviews their waste forecasts for the future, for example, when GCC submitted its Expression of Interest to Defra in 2007, it predicted the county would produce approximately 175,000 tpa of residual waste (again, assuming we achieved our 2020 recycling target). When GCC submitted its Outline Business Case to Defra in April 2008 the predicted tonnage of residual waste at 2040 reduced to 150,000tpa (again, still assuming we reach our 60% target). In terms of contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. With regards to recycling and re-use the Council is already active in this field along with waste reduction (reducing the amount of waste produced in the first place). The Council's recycling target of at least 60% by 2020 is 10% higher than the national target of 50% over the same period.

17. Do you have any comments on Section 3?

No

17. Officer Response.

Noted

18. Do you have any comments on Section 4?

It is only deliverable if you over committ in terms of tons to a long term contract at inflated prices, because you have been led down that path by parties with an interest in making money along that path. Reduce your tonnage, maximise recycling, talk to Retailers in the same boat as you, who are already taking evasive action to getting into bed with those you are falling into bed with and work together. The WEEE directive has put retailers in a position of responsibility for end of use, The packaging directive has done the same. Consult with the retailers. You have the same challenge, cut out the people that profit from you not working together.

18. Officer Response.

Comment noted. The site options consultation included a draft delivery and implementation framework and a monitoring framework. The delivery and implementation framework identifies for each policy, proposed delivery mechanisms, lead agencies, funding mechanisms, timing, potential constraints to delivery and possible mitigation. The monitoring framework is based on identifying policy objectives and targets as well as different indicators for measuring progress. These will be developed further in preparing the WCS Publication. The specific issues raised (i.e. long-term contract, maximising recycling, liaison with retailers) are outside the scope of the WCS.

19. Do you have any comments on the Sustainability Appraisal reports?

ditto

19. Officer Response.

See response to Q18.

20. Do you have any comments on the Habitat Regulations report?

No

20. Officer Response.

Noted.

Number 226 Type IND Name Rupert Ellis Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I am writing with great concern as I understand that the land currently used by the Cheltenham & District Clay Club currently uses is being considered for the treatment of waste and as a member of this club for the last 10 years would like to voice my objections in the strongest terms. I relocated to the South West in 1999 following a succession of redundancies in the Home Counties and as an enthusiastic rifle & clay pigeon shooter looked all over the region for clubs where I could continue to enjoy my sport. Considering the rural native of the County and our Country's fine heritage in sporting prowess in shooting disciplines I was staggered by the lack of clubs and facilities locally. Both my partner, Andrea Swain, and myself are member of this friendly, safe and well run club and have taken great delight in introducing new people to our sport at the Stoke Orchard shooting ground and should this site, which has been beautifully landscaped and planted with trees, be broken up for a waste treatment project then it is my belief that the whole county not just the immediate vicinity that will suffer as a result of its loss. When I look at how much money has been invested is the likes of cycling, rowing, tennis and similar not to mention athletics with many hundreds of millions also being spent on the 2012 Olympics, I find it unbelievable that an established popular and well managed shooting club should be considered with closure as a result of a waste treatment plant which could be located on any number of alternative sites especially with so many brownfield sites that could be used for this purpose. I also believe that the location of this club is also set in a remote location which currently serves its purpose well, however I do not believe that the road infrastructure and access routes lend themselves to additional commercial traffic being carried and feel that local residents will also have strong views against your proposed change of use for this land. I would further add that I am originally from East Anglia and as such have had the opportunity to shoot with and observe both George Digweed (16 time world champion, 7 world FITASC championships, 9 world sporting championships, 13 European championships, 11 world cups and MBE) and John Bidwell (3 times world clay pigeon shooting champion) which has proved greatly beneficial to my own enjoyment of the sport. Both these chaps are active in their local communities and have excelled at the highest level in our sport. I therefore find it ironic that at a time when so much money and effort is being spent on the Olympics and is trying to secure the 2018 football world cup that my local county council would even consider the destruction of a local shooting club is beyond me. For the record both Andrea and myself are also members of Greensleves Shooting Club across the road from the Cheltenham & District Clay club and our comments also relate to those facilities as well. Shooting is not an elitist sport neither are those that participate and enjoy it modern barbarians. Our county has a fabulous tradition of sporting endeavours when it comes to shooting discipline and we object strongly to the proposal to take our sport away.

17. Officer Response.

Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the inclusion criteria for the original long list of over 300 sites (please see Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that this site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 344 Type IND Name Steven Eperjesi Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

I have just moved back to Glos. I'm a keen re-cycler (re-cyclateer) climate change would be my stand-point but I don't have enough knowledge of the sites in total. However, you can have my view.

2. Officer Response.

Comment noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre	X		
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

Please refer to answer to Q1.

4. Officer Response.

Support for Zone C noted.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Disagree

6. Please give a reason for your answer to Question 5.

Climate change. People's health!

6. Officer Response.

Comment noted. With regards to climate change, the provision of new waste treatment facilities within the urban extensions, if they were to go ahead, would provide the opportunity to make a contribution to reducing climate change by diverting waste from landfill. It would also present the opportunity to treat the majority of Gloucestershire's waste, which is generated at Gloucester and Cheltenham, close to source, thereby minimising transport requirements and helping to reduce CO2 emissions. In terms of health impact, PPS10 states that modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health. The WCS has a role to play in ensuring all new development is underpinned by appropriate waste management infrastructure (e.g. recycling facilities). The site options consultation paper however focuses on

Number 344 Type IND Name Steven Eperjesi Organisation not applicable/not provided

identifying a site or sites suitable for accommodating a strategic waste management facility and there has been no interest from either waste operators or the developers leading the urban extensions in providing this type of facility as part of the development. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

consider but don't ponder

8. Officer Response.

Comment noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney		X	
3. Land at Lydney Industrial Estate, Lydney	X		

10. Please give a reason for your answers to Question 9.

If an area is industrial already leave farmland alone!

10. Officer Response.

Comment and support noted. The Hurst Farm site is currently farmland but it is allocated for employment uses under Policy (R) F Lydney 7 in the adopted Forest of Dean Local Plan. The principle of development in this location has already therefore been accepted. Notwithstanding the above, having regard to forecast capacity requirements (i.e. the number of sites needed) and the need to manage waste close to source in line with national policy, it has been decided not to allocate any strategic sites outside the area referred to as Zone C (the central area of Gloucestershire). As this site is outside Zone C it is not being taken forward. Also, the lack of waste industry interest in response to this site through the site options consultation (2009) raises question marks over the deliverability of the site for waste management purposes. Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I'm not sure/I don't know

12. Please give a reason for your answer to Question 11.

Number 344 Type IND Name Steven Eperjesi Organisation not applicable/not provided

Please refer to answer to Q1

12. Officer Response.

See previous responses.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

Sorry don't know of any

13. Officer Response.

Noted.

14. Do you have any comments on the Executive Summary?

No

14. Officer Response.

Noted.

15. Do you have any comments on Section 1?

No

15. Officer Response.

Noted.

16. Do you have any comments on Section 2?

Is the waste core strategy dealing with just finding a convenient place to not upset close residents or a longer term view to change attitudes look at Germany's waste management.

16. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements.

17. Do you have any comments on Section 3?

It was a worry to see a farn on the list for consideration. Were there the infrastructure to bury composting vegetable waste, I would not have a problem with that site. We're not there yet!

17. Officer Response.

Both Nastend Farm and Hurst Farm although currently greenfield land are allocated for development. The principle of development in these locations has therefore already been accepted. With regard to Nastend Farm, the site has not been taken forward into the publication WCS because although the County Council is the

Number 344 Type IND Name Steven Eperjesi Organisation not applicable/not provided

landowner, following discussions with the County Council's Waste Disposal Authority (WDA) it would appear that there is significant uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore, the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.
With regard to Site 2a, Hurst Farm, having regard to forecast capacity requirements (i.e. the number of sites needed) and the need to manage waste close to source in line with national policy, it has been decided not to allocate any strategic sites outside the area referred to as Zone C (the central area of Gloucestershire). As this site is outside Zone C it is not being taken forward. Also, the lack of waste industry interest in response to this site through the site options consultation (2009) raises question marks over the deliverability of the site for waste management purposes. Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

18. Do you have any comments on Section 4?

Just implement and deliver value for money with respect for the environment.

18. Officer Response.

Comment noted.

19. Do you have any comments on the Sustainability Appraisal reports?

Sustainability is the biggest issue! I have no comment other than we need to deal with it quicker than we think.

19. Officer Response.

Comments noted.

20. Do you have any comments on the Habitat Regulations report?

No. I don't feel qualified.

20. Officer Response.

Noted.

Number 396 Type IND Name Mark Epton Organisation Sustainable Stonehouse

17. Do you have any comments on Section 3?

We oppose the proposed construction of a waste incinerator at Javelin Park, Hardwicke, Gloucestershire. Simply burning it, is not a sustainable solution to the problem of residual waste. We are worried that transporting the waste from all of Gloucestershire (and probably other counties) to one place - the incinerator - will add considerably to climate change pollution. Closer to home, we are concerned about the potential increase of traffic on one of the main roads through Stonehouse (the A419). Large trucks transporting smelly waste could well be coming right through the town, adding to an already busy and noisy road. We are also concerned about the proximity of the incinerator, its pollution and the effect of toxic fly ash on our health. A recent survey by Stonehouse Town Council proved that local people are interested in finding out more about recycling and waste reduction. There are many avenues that could be pursued to minimise household waste, such as reducing the amount of packaging, promoting home composting, and widening the range of materials collected at the kerbside and local recycling centres. (We have contributed to this effort by producing a Green Guide for the Stonehouse area containing a wide range of information on how to reduce, reuse, recycle and repair.) Stroud District, for example, has a comparatively poor recycling rate (only 25.88% of household waste recycled in 2007/8) compared to an average of 34.13%. Some authorities achieve as much as 55% or even higher*. We believe that there is insufficient evidence that incinerators are safe and nonpolluting; until such a time as their efficacy can be proved, taxpayers' money would be better spent on reducing the amount of residual waste and improving recycling facilities.

17. Officer Response.

Comment noted. Dealing with each in turn. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10 which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. The council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the county. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. The advantages and disadvantages would be investigated further during the procurement process. Waste management and the move away from landfill are driven by the Climate Change agenda. Climate change is a wider issue which the development of this solution can positively contribute. Carbon footprint is assessed as part of the life cycle analysis. GCC will ask for details of emissions management as well as any other foreseeable environmental impacts and plans to mitigate these will be requested. DEFRA have commented on this issue directly by stating: "The plans could also make an important contribution to the drive to tackle climate change by delivering estimated net carbon savings of 33,800 tonnes in 2020, compared to the current arrangements, or 64,700 tonnes if the final technology solution includes combined heat and power." In terms of traffic, PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. For Javelin Park, the assessment suggests a likely net decrease in traffic and highlights the very good trunk road accessibility of the site. Potential impacts on Junction 12 of the M5 will need to be explored should a detailed proposal come forward. With regard to health impact, PPS10 states that modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health. Furthermore, the detailed consideration of a

Number 396 Type IND Name Mark Epton Organisation Sustainable Stonehouse

waste process and the implications, if any, for human health is the responsibility of the pollution control authorities. PPS10 also states that, where concerns about health are raised, waste planning authorities should avoid carrying out their own detailed assessments rather they should ensure, through drawing from Government advice and research and consultation with the relevant health authorities and agencies, that they have any advice on implications for health. The WPA duly sought the advice from the PCT/NHS through the site options consultation. In terms of incineration acting as a disincentive to recycling, GCC will be procuring a solution that aligns with its recycling and composting objectives. Tonnages are based on achieving 60% recycling capacity and are reviewed regularly using the most up to date figures. 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not necessarily accurate to assume that incineration undermines recycling.

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1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

We do not agree that the WCS should focus on Zone C. Waste is created by everyone in the county and it is not appropriate to designate some areas as being too valuable to accommodate any form of waste management facility. SWARD has consistently argued that we need to look for small scale facilities to deal with recycling and residual waste closer to the source. By focusing on only Zone C the WCS would mean waste travelling long distances to large facilities concentrated in only a few, or even one location (e.g. Wotton under Edge to Easter Park; a 60 to 70 mile round trip). Even if transfer stations are used to bulk up loads during local collections, the total mileage travelled by the waste to its final destination must be considered. We must move towards a solution where communities deal with their own waste rather than accept the attitude that some are too sensitive to be considered. If all land outside Zone C is too sensitive for use relating to waste management, it must be too sensitive for any form of development at all, which is clearly not the case. It is possible to design small units sensitively attuned to the location chosen. We believe that Section 6.20 of the Technical Evidence Paper WCS-N Site Selection Methodology makes it impossible for a network of smaller, more suitably scaled facilities to be developed in keeping with their surroundings: Although specific technologies were not considered, it was decided that any site should becapable of handling over 50,000 tonnes of waste per annum. This meant that the majority of the 110 sites still being considered up to this point were too small. This decision was based on guidance and previous policies dating back to 1999. SWARD believes we need to take a fresh approach for dealing with our 21st century waste issues. We consider that the WCS places so much emphasis on using sites that are already waste sites, as demonstrated in the statement that proposals on allocated waste sites do not have to demonstrate a need 3 that there is little likelihood of innovative, smaller scale facilities being developed on sites across the county. Even based on the county's assumption of 150 000 tonnes of residual waste per year, insisting on a minimum of 50 000 tonnes per site forces the strategy to be based on at most 3 large facilities rather than a network of more appropriately scaled operations. 4. It is impossible to comment properly on the merits of the 10 specific sites in Zone C when we have no idea what is being proposed to go on these sites. From our knowledge of the Residual Project, we conclude that until the final decision has been made and the contract awarded we cannot tell whether we are being asked to consider if these sites are suitable for one large incinerator; a combination of technologies such as a techanical and biological treatment plant; a network of smaller facilities to include recycling, composting, etc etc. Without any idea of the nature or the scale of the proposed activity, it is impossible to say if a site is appropriate. Our comments can therefore be based only on our current knowledge.

2. Officer Response.

Comments noted. Dealing with each in turn. Strategy: It is essential that the WCS presents a clear spatial strategy setting out what will be built and where. The designation of Zone C is consistent with national and regional policy and avoids the Cotswolds AONB and large areas of floodplain. The designation of Zone C does not mean that proposals outside this area cannot come forward where there is market interest, subject to relevant criteria. Network of small-scale facilities: In terms of developing a network of smaller facilities, the site options consultation paper identified 13 potential sites, 10 within Zone C, 3 outside Zone C. Views were invited on using a combination of different sites. The consultation made it clear that whilst some of the sites are capable of providing a one-site solution, it may be that strategic waste management of municipal waste comes forward on several different sites. The council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed). However GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the county. Flexibility and cost: Following the decision by Defra in October 2010 to withdraw Gloucestershire County Council's Private Finance Investment (PFI) credits (worth £92million), the council is currently carrying out a strategic review of the project. The outcome from the review will be considered by Cabinet in February 2011. Ultimately Gloucestershire County Council has to find an alternative to landfill. Doing nothing is not an option. The contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Research shows that PFI helps deliver projects on time and on budget more

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effectively than other types of procurement. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly (amortising cost over shorter period) and therefore being unaffordable or there would be a balancing payment on contract expiry. It should not be assumed that economies of scale mean an inflexible solution. GCC recognises that regardless of the type of solution proposed, it is important that the solution must be able to cope with changes in waste volumes and composition, as it is inevitable such changes will happen. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability or a reduced cost to the authority. Technology: With regards to technology, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10 which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

We are disappointed to see three sites (seven areas) proposed at Wingmoor, in the light of our earlier comments regarding the need to move away from centralised, large facilities to a system of each locality taking responsibility for its waste. Wingmoor has become a huge collection of waste activities more by default than design. Because planning law dictates that each application must be considered on its own, regardless of what else maybe in existence or proposed, Wingmoor has been able to grow through a series of incremental developments each creating only slight impacts. The accumulation of these slight impacts has resulted in very significant impacts which are, ironically, becoming the justification for continuing and adding new waste management operations in this area. We are very concerned that a continued policy of favouring waste related activities on, or close, to existing sites has led to one single area being the focus for the majority of not only Gloucestershire's waste, but a significant percentage of the UK's hazardous waste. This has had a severe impact on the greenbelt in which all three of the proposed WCS sites are located. We believe that it is equally important to protect what is left of the green belt land around the existing Wingmoor sites as it is to protect the Cotswold Area of Outstanding Natural Beauty (AONB). We are therefore particularly concerned to see even more areas of the green belt being put forward in Areas A and C at Wingmoor Farm West. It is therefore not acceptable to increase the size of Wingmoor Farm West beyond the boundaries shown in the Waste Local Plan, adopted in October 2004. Area A was the land for which a planning application by TEG 04/6821/0839/FUL was rejected by the Council in 2004 on the grounds that it was in the Green Belt and not within the Waste Local Plan. SWARD believes the situation has not changed. If anything is to be added at Wingmoor something must be removed; it is simply unsustainable to increase the number of traffic movements and levels of disamenity caused by the waste operations. Appendix C No 584 acknowledges that there are already likely to be problems with traffic at junctions on the A435. There is no real acknowledgement that the minor road Stoke Orchard / Stoke Road is unsuitable for the current levels of HGV movements, which are already in excess of 150 000 per year. Reference in the WCS to the railway bridge suggests that whilst the railway bridge is in reasonable condition at present, there may be issues in the longer term.Other sites in the WCS were rejected because of

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the unsuitability of access. It is only the presence of existing operations that make Wingmoor suitable and we believe it is quite unacceptable to drive forward a policy of further development on the basis that operations are already in existence, no matter how negative an impact they are having on the area. The Wingmoor sites and their access roads are very close to large numbers of residences. 15,000 people live within 3 km of Wingmoor Farm. Disamenity including traffic, dust and odours, caused by the existing waste sites has been acknowledged by some properties close to the sites having their council tax reduced by up to two bands. The Environment Agency Incident Reports catalogue month after month, year on year complaints about adverse odours around the Wingmoor sites. Concerns regarding the impact of the Wingmoor sites are such that the Health Overview and Scrutiny Committee undertook a review. Their report has not yet been published and we consider it premature to recommend the further use of land at Wingmoor until their findings are complete. Similarly, the Community Health Impact Assessment being facilitated by NHS Gloucestershire was set up specifically because of the level of concern. This piece of work is not yet complete, publication being anticipated in January 2010 following completion of a two day community consultation event. Until this has been completed and the findings reported to HOSC, we do not believe that Wingmoor, and in particular Wingmoor Farm East should be considered. 5. The Joint Core Strategy (JCS) includes land north west of Cheltenham for significant development; a settlement the size of Bishop's Cleeve or Tewkesbury. This would abut Area A of Wingmoor Farm West, and only be 750 metres from the hazardous Wingmoor Farm East Area C. PPS 10 is clear that such proposed development should be considered in planning waste sites: Likely proposed development in the vicinity of the location under consideration should be taken into account in considering site suitability and the envisaged waste management facility. The proximity of the proposed houses and allotments to an existing hazardous waste site and a 50 000 tonne proposed new residual waste facility would be wholly unacceptable. PPS 10 is clear regarding the provision of waste management: Planning authorities should ensure that new development makes sufficient provision for waste management and promote designs and layouts that secure the integration of waste management facilities without adverse impact on the street scene or, in less developed areas, the local landscape. We assume that the new developers are simply relying upon the existing waste sites, ignoring their own responsibility under PPS10, as the current layout does not show waste facilities to deal with what is in effect is a new town.

4. Officer Response.

Comments noted. Dealing with each in turn. The re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community. Whilst it is acknowledged that the Green Belt should generally be protected, PPS10 emphasises that local authorities should recognise the particular locational needs of some types of waste management facilities when defining detailed green belt boundaries and, in determining planning applications. In line with the PPS10 companion guide, should any sites within the Green Belt be specifically allocated within the WCS, it will need to be clearly indicated that they are for waste management purposes only. In terms of traffic, PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. For the Wingmoor Farm sites the issue of local capacity was raised with the suggestion of likely improvements being needed e.g. junction improvements. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. In terms of health impact, PPS10, states that modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health. Furthermore, the detailed consideration of a waste process and the implications, if any, for human health is the responsibility of the pollution control authorities. PPS10 also states that, where concerns about health are raised, waste planning authorities should avoid carrying out their own detailed assessments rather they should ensure, through drawing from Government advice and research and consultation with the relevant health authorities and agencies, that they have any advice on implications for health. The WPA duly sought the advice from the PCT/NHS through the site options consultation. APC (fly-ash) residues would be regulated by the Environment Agency through the Environmental Permitting regime. In terms of proximity to housing (existing and proposed), clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which

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encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. With regard to the specific issues of odour and dust, these are matters that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any sensitive receptors. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning conditions.

17. Do you have any comments on Section 3?

Whilst we appreciate that this site consultation is about sites and not about previously discussed waste issues in general (p.12, 1.14) it is difficult to comment without dealing with the premises on which the Waste Core Strategy is based. 1. We believe that the data on which the WCS is based are flawed. SWARD has argued consistently that the county recycling and composting targets are unambitious: 'Gloucestershire has a major waste management challenge that needs to be solved. Whilst all waste presents a challenge for us, a particularly pressing issue is household waste. Our target is to recycle and compost at least 60% of our household waste.' In figures produced by Defra, the top 15 district and top 3 county councils were already achieving more than 50% recycling in 2007 / 2008. In a paper presented to Cotswold District Council on 19th November 20091, the District is shown as already having achieved 61% recycling in 2008/9. Much more needs to be done to reach a target of over 80% if Gloucestershire is serious about disposing of only truly residual waste. We also consider that the projections for waste arising need to be reconsidered: However, even if we manage to achieve this there will still be at least 150,000 tonnes of leftover (residual) household waste to deal with each year. We take this opportunity to draw attention once again to Alan Watson's report, also attached, commissioned by Gloucestershire Friends of the Earth Network in response the PFI Outline Business Case. He shows that GCC assumptions about waste growth greatly over estimate the tonnages of residual waste. SWARD is well aware that Defra figures continue to show a continuing down trend in residual waste arising. Within Gloucestershire there has also been a very significant reduction in waste taken to the household recycling centres (HRCs). May Gurney reported to the October meeting of the Wingmoor Liaison Forum that they had seen a fall of 1,000 tonnes each month since introducing measures to prevent commercial waste coming into the sites. This waste source was included in the data used to develop the WCS (even though the majority of material going to the HRCs is recyclables, not residual waste). We believe that there is a need to reassess the projections for household residual waste We therefore submit that the need for the sites is based on flawed assumptions In summary, We believe that the assumptions about waste growth need to be reviewed as we consider 150 000 tonnes per year of residual waste to be too high. We believe it is premature to consider any of the sites before we know what technology is being proposed for the county's residual waste. We consider the Wingmoor sites unsuitable for any activity additional to those already in operation.

17. Officer Response.

Comments noted. Dealing with each in turn. The waste data contained in the site options consultation was the best available. An updated data paper has been made available alongside the Publication WCS. Notably the estimate of 150,000-270,000 tonnes of residual municipal waste is in line with the 200,000 tonnes per annum set out in the South West RSS (Proposed Changes). Whilst the Government is committed to the abolition of the RSS, at the present time, it remains a material consideration. The Council's recycling and composting target is at least 60% by 2020. This is contained in the Gloucestershire Joint Municipal Waste Management Strategy (JMWMS). Notably the target is 10% higher than the 50% national target contained in the National Waste Strategy. In terms of forecast waste arisings, see response above concerning waste data. In terms of technology, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site

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allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. With regard to Wingmoor Farm, the re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community.

Number 444 Type LAC Name Janet Farrow Organisation Newtown Area Community

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
3. Easter Park, Ashchurch		X	

4. Please give a reason for your answers to Question 3.

I write on behalf of Newtown Area Community and Residents' Association who strongly urge you to reconsider the suitability of the Easter Park location at Ashchurch in Tewkesbury as a possible recycling site. We are particularly concerned that during previous industrial use the site experienced leaks which caused contamination of local water sources and still has a natural water course running through the grounds which could exacerbate future pollution. The surrounding area has now also been developed substantially for residential use so any contamination risk would impact on a massive number of households as well as business and schools. The other factor that concerns us local residents is the increase in the number of lorries that would be using an already busy road which during certain times of the working day is at a standstill. We trust you will give our concerns serious consideration and reach the conclusion that this location is not suitable for a recycling/incinerator site.

4. Officer Response.

Comments noted. PPS10, states that modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health. The detailed consideration of a waste process and the implications, if any, for human health is the responsibility of the pollution control authorities. Whilst the former industrial use of this site may have caused pollution, this does not mean a new waste treatment facility would create the same problems. With specific regard to pollution it should be noted that planning and pollution control regimes are separate but complimentary. Pollution control is concerned with preventing pollution whilst planning controls the development and use of land. Waste planning authorities are expected to work on the assumption that the relevant pollution control regime will be properly applied and enforced. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. At Easter Park, the assessment showed that the provision of a waste treatment facility may in fact lead to a reduction in the amount of traffic compared to that which could be generated if the existing planning permission were to be implemented. The site also enjoys good access to Junction 9 of the M5, which can be accessed via the A46 without going through residential areas. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. In terms of facility type, the focus of the WCS is on allocating sites for the treatment of residual municipal waste. This is the waste that cannot be recycled or composted. The WCS will not formally allocate sites for recycling. With regard to incineration, at present the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. Notwithstanding the above, the site has not been taken forward into the Publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national

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policy and any other material considerations.

Number 109 Type IND Name Sue Fleming Organisation not applicable/not provided

17. Do you have any comments on Section 3?

Have carefully read the Waste Core Strategy Site Options Consultation paper and attended the Green Party's discussion on Waste management, I write to object to the use of all 13 of the sites listed for possible waste treatment in Gloucestershire on the grounds that: a.. Any of these sites could be used for incineration, which I oppose. b.. Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. c.. I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. d.. The long term costs to the taxpayer will be higher with incineration. e.. Incinerators act as a disincentive to reduce, reuse and recycle. f.. The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas. g.. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. h.. Large incinerators in other areas of the country are already deemed to be a mistake.

17. Officer Response.

With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 112 Type IND Name Susan Fletcher Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

I think one of the other areas in the County could be used - I'm sure you intend "beautifying" this "facility" and I suspect an area further from population centre might be identified elsewhere in the county.

2. Officer Response.

Comment noted. The proposed focus on Zone C is consistent with national and regional policy and will allow for most of Gloucestershire's waste (arising in Gloucester and Cheltenham) to be managed close to source. Identifying remote sites would mean waste having to travel further and would be contrary to policy.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

A rather difficult question considering I do not know many of these sites - I need to know how near they are to centres of population, how easy they are to access the road structure etc). I do not know how large, noisy, smelly the various options are. I do not know how you propose to deal with the fly ash trasportation (though I do know where it will end up). I cannot compare these sites through lack of information about them - I know I don't want any of these alternative "treatment facilities" anywhere near me in Bishops Cleeve and I guess other people in the other proposed areas feel the same way. Here in Bishops Cleeve we know about the problems associated with waste - we suffer traffic nuisance, smells, dirt, potential health hazards, eyesores. Bishops Cleeve has had more than its share of the county waste problem and its still ongoing.

4. Officer Response.

Comments noted. The site options consultation included a range of information on each site including maps and a site schedule. This was supplemented by further information contained in the supporting evidence base. All sites are intentionally close to centres of population because the treatment of waste close to source is consistent with national and regional policy. Site information on transport issues is set out in the site schedule provided for each site. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. Fly ash is associated with the process of incineration. Importantly the Council is currently technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. Odour, noise and dust are matters that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any 'sensitive receptors'. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do

Number 112 Type IND Name Susan Fletcher Organisation not applicable/not provided

exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning conditions.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Agree

6. Please give a reason for your answer to Question 5.

Why not? If you have to plan new "urban extensions", why not plan in an appropriate area for this facility? Surely you can then position it approximately away from people and their lives.

6. Officer Response.

Support noted. The WCS has a role to play in ensuring all new development is underpinned by appropriate waste management infrastructure (e.g. recycling facilities). The site options consultation paper however focuses on identifying a site or sites suitable for accommodating a strategic waste management facility and there has been no interest from either waste operators or the developers leading the urban extensions in providing this type of facility as part of the development. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead their waste management requirements will be addressed through the general policies and requirements of theWCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

Again, why not? If you are going to use a Zone C site, why shouldn't another area help - it's not only zone C that creates the rubbish and provided you plan the transportation system etc. I cannot see a particular problem.

8. Officer Response.

Comment noted. All areas produce waste and this must be managed effectively. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

10. Please give a reason for your answers to Question 9.

Again, I do not know them and again add the proviso they shold be away from people's homes - bit agian, I do not exactly know what is meant for them as their share in this process?

10. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also

Number 112 Type IND Name Susan Fletcher Organisation not applicable/not provided

consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. These sites will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I do not support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

Why shouldn't the other zones have a share of this process - they create rubbish too, i.e. why zone C? Could use 2 zones (or more) - don't have to use zone C.

12. Officer Response.

Comment noted. All areas produce waste and this must be managed effectively. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

I'm not aware but I'm pretty sure there are some more isolated spots elsewhere in the county, not just in Zone C.

13. Officer Response.

Comment noted. It is essential that the WCS provides a clear strategy setting out what will be built and where. This will provide certainty and confidence to the development industry and help bring proposals forward. The Council's preferred strategy is to focus the location of new strategic waste management facilities on the area defined as Zone C. Although there may be sites available in more isolated locations away from populated areas, locating strategic waste management facilities in these areas would be contrary to policy laid out in PPS10 and the Regional Waste Strategy which require waste to be treated close to source in accordance with the proximity principle.

Number 122 Type IND Name Helen Fletcher Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

I do not support the search for strategic waste sites on the area in zone C as a majority of these sites are next to housing, inadequate road infrastructure and particularly at Wingmoor farm have too many other interests going on. We are not sure of the health implications inflicted on any population nearby especially with incineration because the toxic fly ash would be able to blow around.

2. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10 Planning for Sustainable Waste Management, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. With regards to health, PPS10 states that 'Modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health'. Furthermore, the detailed consideration of a waste process and the implications, if any, for human health is the responsibility of the pollution control authorities. PPS10 also states that, 'where concerns about health are raised, waste planning authorities should avoid carrying out their own detailed assessments, rather they should ensure, through drawing from Government advice and research and consultation with the relevant health authorities and agencies, that they have any advice on implications for health'. The WPA duly sought the advice from the PCT/NHS through the site options consultation. APC (fly-ash) residues would be regulated by the Environment Agency through the Environmental Permitting regime.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch		X	
4. Javelin Park, Haresfield		X	
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

Number 122 Type IND Name Helen Fletcher Organisation not applicable/not provided

The sites which are suitable are near housing (health risks) extra traffic. These sites should be away from the population.

4. Officer Response.

See previous response in relation to impact on residential areas and health.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

6. Please give a reason for your answer to Question 5.

Can't comment as the RSS has not been sorted out yet

6. Officer Response.

Comment noted. The potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I'm not sure/I don't know

8. Please give a reason for your answer to Question 7.

Would not like to inflict incineration on another area. If there were no incineration on the agenda then may support as there are area of less population.

8. Officer Response.

Comment noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. In reference to the mention of incineration, at the present time the Council is 'technology neutral' with no decision having been made on the technology or combination of technologies that will be used to treat Gloucestershire's residual municipal waste. See previous response in relation to potential impact on populated areas. With regard to sites outside Zone C it has been decided that on balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period no strategic site allocations outside Zone C will be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

Number 122 Type IND Name Helen Fletcher Organisation not applicable/not provided

11. Do you support the approach of using a combination of sites within and outside Zone C?

I do not support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

as answered in Q10

12. Officer Response.

See previous response.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

NO

13. Officer Response.

Noted

Number 286 Type IND Name R Fletcher Organisation not applicable/not provided

17. Do you have any comments on Section 3?

As a Conservative supporter, I was very surprised to see from the Lib-Dem newssheet Spotlight that you have introduced a proposal to install a waste incinerator on land off Myers Road. As this area, adjacent to Armscroft Park, is a pleasant residential area which houses a number of young families with children, it is difficult to imagine a more inappropriate location for such a facility. I should be very interested to learn your reasons for thinking otherwise. Since the prevailing wind is from the South West, it would seem more sensible to locate an incinerator beyond the Northern By-Pass or at the industrial estate at Brockworth, or at Hempsted where there are already waste disposal facilities. Gloucester is a fairly compact city surrounded by open country. It should not be necessary to subject those citizens who live in a well-established residential area to the nuisance which would inevitably arise from the implementation of this plan.

17. Officer Response.

Comments noted. Dealing with each in turn. With regards to location, clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10 which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. With regard to Site 7, it has not been taken forward into the Publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the Publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 356 Type IND Name Christine Fletcher Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Zone C is the area where most of the waste eill be produced

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre	X		
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park	X		
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

Suitability dependent on access to major road networks & location with regards to residential housing - not in the middle of a housing estate or near to schools etc. Think the Wingmoor Park sites already over developed with regard to waste disposal

4. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. The Wingmoor farm sites have been considered in terms of the cumulative impact of waste development, but Government guidance in PPS10 also seeks to co-locate waste facilities together with complementary activities.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

Number 356 Type IND Name Christine Fletcher Organisation not applicable/not provided

6. Please give a reason for your answer to Question 5.

You cannot consider building more housing etc without consideration for the disposal of the increased waste that will be created

6. Officer Response.

Noted. The WCS has a role to play in ensuring all new development is underpinned by appropriate waste management infrastructure (e.g. recycling facilities). The site options consultation paper however focuses on identifying a site or sites suitable for accommodating a strategic waste management facility and there has been no interest from either waste operators or the developers leading the urban extensions in providing this type of facility as part of the development. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

Gloucestershire is a large County - some areas quite rural. Pre-processing local sites acting as feeder stations would be a good idea

8. Officer Response.

Support noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

Not familiar with these particular sites. Do not know how they fit the criteria I gave in Question 4

10. Officer Response.

Noted.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

Using a numer of sites for different operations will cut down on transportation costs, CO2 emissions and any benefits heat/generating power could be used locally

12. Officer Response.

Support noted. The scope for recovering heat from waste is acknowledged subject to availability of suitable heat clients. Electricity can be exported to the national

Number 356 Type IND Name Christine Fletcher Organisation not applicable/not provided

grid.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

The potential of any site would always be defined by the type of treatment system chosen or deemed suitable for that particular site. Not aware of any other sites.

13. Officer Response.

Comment noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.

14. Do you have any comments on the Executive Summary?

Have not read all or any of the above - went to an exhibition at Stonehouse community hall. Believe waste management should be about re-cycling as much as possible. Treating food & organic waste separately i.e Anaerobic digestion. Hopefully leaving very little residual waste - so uneconomic to consider Incineration

14. Officer Response.

Comment noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. The County Council's target is to achieve at least 60% recycling and composting by 2020 with an aspiration for 70%. This is an ambitious target that exceeds the national target of 50% over the same period. However, even with effective recycling and composting initiatives there will always be an element of residual waste (i.e. the waste leftover after composting and recycling) that will need to be managed. In terms of reducing waste at source, the Publication WCS will include a policy on waste minimisation aimed at reducing the amount of waste produced by development such as housing and employment. The Council also has a number of separate initiatives including its real nappies, junk mail and love food hate waste schemes.

Number 165 Type IND Name Nigel Flory Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I write to object to the use of the Javelin Park Site at Haresfield for possible waste treatment in Gloucestershire on the grounds that: Incineration creates toxic fly ash residue which is toxic and dangerous, and which has to be transported and buried, creating a risk to nearby residents which is unacceptable. I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. The long term costs to the taxpayer will be higher with incineration. Incinerators act as a disincentive to reduce, reuse and recycle. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative, that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. Large incinerators in other areas of the country are already deemed to be a mistake (i.e. Allington, Kent).

17. Officer Response.

With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 166 Type IND Name Louise Flory Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I write to object to the use of the Javelin Park Site at Haresfield for possible waste treatment in Gloucestershire on the grounds that: Incineration creates toxic fly ash residue which is toxic and dangerous, and which has to be transported and buried, creating a risk to nearby residents which is unacceptable. I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. The long term costs to the taxpayer will be higher with incineration. Incinerators act as a disincentive to reduce, reuse and recycle. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative, that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. Large incinerators in other areas of the country are already deemed to be a mistake (i.e. Allington, Kent).

17. Officer Response.

With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 317 Type IND Name Ashely Foale Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	

4. Please give a reason for your answers to Question 3.

Please accept this letter as a formal objection to the proposed further development of the Wingmoor Farm site near Bishops Cleeve. Whilst I understand the drive to increase recycling in waste management, the reasons for my objection in this case are based on two specific and valid areas. Firstly, I live approximately 3 miles from the Wingmoor Farm site and know the area and roads well. I have seen the WF site expand and develop over the years. Everyone knows the access around WF is limited to small windy single carriageway roads which are ill suited to the volume of waste lorry traffic they are currently exposed to; let alone any increase. WF is considerably further from motorway access when compared to other proposed sites, and unlike the majority of other proposed sites currently supports a number of business activities. The increased traffic will also directly affect businesses near the household recycling centre, even if the sites are not themselves requisitioned. The WF site already handles (to the objection of the majority of the local residents and many councillors), toxic waste from outside the vicinity and to force yet more waste handling/processing on the area of Bishops Cleeve is frankly unfair. I also understand from the SWARD and council websites that no decision has even been made as to the nature of the reprocessing facilities, which would cast even more uncertainty over the future of the area.

4. Officer Response.

Comments noted. In terms of transport, PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. For the Wingmoor Farm sites the assessment identified a likely net increase in traffic and the need for capacity improvements in certain locations. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. In terms of delivering further waste facilities at Wingmoor Farm, the re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community. In terms of treatment types, the Council is currently technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.

17. Do you have any comments on Section 3?

I am and have been a member of the Cheltenham & District Clay Club at The Park for many years. As far as I can see, there has been very little comment about the effects on the club by the proposals and absolutely no provision for an alternative site for the club to be made available. Nor has there been any recognition what the club brings to the community. Over the years the C&DCC has invested a sizeable amount of money and effort in to developing the site to become one of the best clubs in the region - a fact supported by many of the members coming from outside the county boundary. To remove the club from the site would destroy a well-established facility and reduce the provision for sport in the area, at a time where the Government is actively encouraging greater participation. There is no doubting

Number 317 Type IND Name Ashely Foale Organisation not applicable/not provided

the club's popularity; the membership is capped at around 200, holds national level shoots for specific disciplines, and has donated the proceeds from a memorial shoot to the local Cobalt Appeal Fund for a number of years. To develop the sites at Wingmoor Farm would have a detrimental effect on the quality of life of the area surrounding Bishops Cleeve and Stoke Orchard, and therefore I implore you to dismiss these sites from the proposal.

17. Officer Response.

Comments noted. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the inclusion criteria for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that this site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 253 Type IND Name S Ford Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I felt compelled to write to you with regard to the proposed application to use Cheltenham & District Clay Club part of Wingmoor Farm estate as a waste treatment site. The road access to WIngmoor farm is over used already and the Stoke Road has too many Lorries using it daily. The area of Bishops Cleeve & Stoke Prior is used as a recycling area and is not central to Gloucester. This will make not only for more traffic but extra miles for lorries to travel, thereby making the carbon footprint for the area increased. NOT VERY GREEN. Other sites mentioned in the consultation have better access to major roads and motorways and are not being utilised at the moment. Our club has been built up over a number of years with the area landscaped. This provides an area planned for shooting keeping the disturbance to local people to a minimum. It provides a local activity for regular club users and visitors. There is no mention of provision for land to be set aside for the use of our facilities elsewhere in the proposal. Please think again in your choice to use the area covered by our club.

17. Officer Response.

Comments noted. Dealing with each in turn. PPS10 Planning for Sustainable Waste Management emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. For the Wingmoor sites, the assessment identified a potential net increase in traffic and the need for mitigation in certain locations to help increase capacity. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. Whilst the Wingmoor Farm sites are in the northern part of the County rather than the geographical centre, they are located close to Gloucester and Cheltenham which is where most of Gloucestershire's waste is generated. They are also close to Tewkesbury. Treating this waste as close to source as possible is consistent with national and regional policy. The transport impacts of waste being moved from further afield in the County will be minimised through the use of appropriate bulking and transfer facilities. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the inclusion criteria for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from TBC and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that this site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 24 Type DC Name Anouska Francis Organisation Tewkesbury Borough Council

4. Please give a reason for your answers to Question 3.

That facilities of the scale proposed should be located close to the M5 but on a site which is not as constrained by issues such as proximity to business and residential properties as is the case at Easter Park, Ashchurch.

4. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10 which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. Notwithstanding the above, the site has not been taken forward into the publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

17. Do you have any comments on Section 3?

That facilities of the scale proposed should be located close to the M5 but on a site which is not as constrained by issues such as proximity to business and residential properties as is the case at Easter Park, Ashchurch.

17. Officer Response.

Please see response to Question 4.

Number 32 Type IND Name Colin Frith Organisation not applicable/not provided

17. Do you have any comments on Section 3?

Having attended many meetings in order to make an informed decision I regret that I must register my opposition to any form of waste disposal by incineration, As you are aware even with current technology incineration produces potentially toxic emissions and leaves residual contaminated ash to be processed, I recognise that Gloucestershire County Council has to comply with Governmental Directives regarding future waste disposal but the inclusion of incineration into the equation reduces the incentive to reduce, reuse and recycle, and to consider and investigate the developing alternative technologies, Mechanical Biological Treatments including Anaerobic Digestion technology is a proven alternative and it is obvious that there are other developing technologies, I understand that the Javelin Park site was used as a model for a large incinerator to obtain government waste disposal funding and consequently if this project does go ahead we will be forced to find sufficient fuel to keep it going for up to 30 years, during which time even better alternatives will, in all probability, be developed, I also object to all of the proposed 13 additional waste treatment sites throughout the county as, under GCC current thinking, any could be used for incineration, Gloucestershire County Council must make substantial efforts to standardise current recycling throughout the county, to promote "Reduce, Reuse and Recycle" for both domestic and industrial waste, and to properly investigate alternatives to incineration.

17. Officer Response.

Comment noted. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 22 Type PC Name Stuart Fry Organisation Brookthorpe with Whaddon

17. Do you have any comments on Section 3?

I am a Parish Councillor on Brookthorpe with Whaddon Parish Council, and have recently made a contribution to your Waste Core Strategy-Questionnaire October 2009. However, since completing the questionnaire I have read an interesting article in a publication entitled Professional Engineering. I hope I am not too late to make one further contribution as a general comment. I copied this email to the other Councillors so that they are aware of this late contribution. The article makes an important distinction between Energy from Waste (EfW) plants and simple incinerators. In the article it states: "The most common EfW plants are combustion plants. The second most used EfW technology is anaerobic digestion. There are 25 combustion plants in the UK with more planned. They are often confused with incinerators, waste disposal plants that do not produce energy." My feeling is that "EfW plants are preferable to simple incinerators because they provide useful energy from waste."

17. Officer Response.

Comment noted. 'Energy from Waste' is a generic term for any waste treatment process that is able to capture energy in the form of heat and/or power. It includes for example thermal treatment or combustion (incineration), anaerobic digestion, advanced thermal treatment (pyrolisis, gasification etc.) and mechanical biological treatment (MBT).

Number 380 Type IND Name Rob Gaffney Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

This Zone is fundimentalt flawed due to the fact it does cover areas of AONB and parts of it fall in a flood plain, particularly the Javelin Park site which has flooded in the lsat two years and either falls in or adjoins an AONB

2. Officer Response.

Comment noted. The boundary of Zone C has been drawn contiguously with the boundary of the AONB. It therefore does not include any of the AONB. In terms of flood risk, whilst there are some floodplain areas within Zone C it does exclude the main areas of flood risk within the County which lie to the west. All of the sites included in the consultation paper were subjected to a strategic flood risk assessment. All are located outside the floodplain, i.e. in low risk Flood Zone 1. Notwithstanding this, any proposal of more than 1 hectare in size on any of the sites will require a site-specific Flood Risk Assessment (FRA). There are no recorded incidents of flooding at Javelin Park.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X		X
4. Javelin Park, Haresfield		X	
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

If we are going to have this process the most suitable sites must be where this type of activity already exists

4. Officer Response.

Comment noted. The use of existing waste management facilities is consistent with national policy however, regard must be had to the cumulative effect of previous waste disposal facilities on the care and well being of the local community including any significant adverse impacts on environmental quality, social cohesion and inclusion or economic potential. (PPS10). The sites identified in the site options consultation paper included a mix of sites, mainly previously developed land or land with planning permission for development. This included several sites that accommodate existing waste management operations. It should be noted that modern waste management facilities are acknowledged to be compatible with employment uses.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

6. Please give a reason for your answer to Question 5.

Number 380 Type IND Name Rob Gaffney Organisation not applicable/not provided

A combination of sites in areas accross the county seems more suitable than building one vast plant.

6. Officer Response.

Support noted. However, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the Government's intention to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

A combination approach seems preferable.

8. Officer Response.

Support for combination approach noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney	X		

10. Please give a reason for your answers to Question 9.

Spreading this process around the county will allow local communities to feed into this process rather than concentrating on one vast processing plant.

10. Officer Response.

Support for sites 1a and 3a noted, however, on balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. These sites will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the sites forward as allocations at this stage does not mean that the sites are unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

13. Are you aware of any other sites that might be suitable for treating municipal waste?

Sharpness Docks allowing us to use the Canal system to lessen the enviromental effect hundreds of lorries travelling all over the county 24 hours a day.

13. Officer Response.

Number 380 Type IND Name Rob Gaffney Organisation not applicable/not provided

Comment noted. The Sharpness Docks area did have some technical assessments carried out on it and two other parcels of land were submitted as part of the call for sites exercise. However, the landowners of the Sharpness Docks area (Site 547) indicated that the land was not available for residual waste management treatment and of the other parcels submitted one was in conflict with the landowners wishes and the other did not fulfil the inclusion criteria outlined in Technical Evidence Paper WCS-N. For details of site 547 assessments please see Technical Evidence Paper WCS-N and its appendix C.89 and for the other parcels please refer to Technical Evidence Paper WCS-O (pages 30 and 31).

17. Do you have any comments on Section 3?

The Javelin Park site our councils preferred option is flawed on many points. The current planning restricts the height of any buildings on this site. only has permission for light industrial use not for 24 hour Industrial waste processing, sits within 50 yards of a residential neighbour, has flooded at least 3 times in the last two years, sits is on the most dangerous B road in Gloucester, has only one access for 7.5t vehicles accessed by a single carriage road which already causes traffic to queue in both ways on the M5 at junction 12.

17. Officer Response.

Comments noted. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the county. With regard to building height, Javelin Park currently has planning permission for employment use. It was also allocated for waste use in the adopted Waste Local Plan (2004). The site is also previously developed land. The principle of development in this location has already been accepted. Any proposal for a waste facility on this site would require a separate planning application. Any restrictions attached to the current permission would be largely irrelevant as the new application would need to be considered on its merits. Building height would be one of a number of design considerations for negotiation at the planning application stage should a detailed proposal come forward. Notably the landscape assessment carried out in support of the site options consultation identified this site as having medium-high suitability in landscape terms. Although there is one property close to the site there are no areas of housing within close proximity the closest settlement Haresfield being approximately 1 km away. With regard to flood risk, the Strategic Flood Risk Assessment (SFRA) carried out in support of the site options consultation, demonstrates that there are no significant flooding issues associated with this site. It is located entirely in Flood Zone 1 (low risk). Notwithstanding this any proposal of more than 1 hectare in size, would in accordance with Government policy need to be supported by a detailed Flood Risk Assessment (FRA). In terms of transport, PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. For Javelin Park, the assessment suggests a likely net decrease in traffic (compared to situation if existing permission were to be implemented) and highlights the very good trunk road accessibility of the site. Potential impacts on Junction 12 of the M5 will need to be explored should a detailed proposal come forward. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan.

19. Do you have any comments on the Sustainability Appraisal reports?

This proceess cannot function without enough waste to fuel it one large plant will not be able to run on waste from Gloucestershire alone leading to waste having to be imported from Bristol,Birminham or Cardiff adding more harm to the environment.

19. Officer Response.

Comment noted. The council endeavours to deliver a solution to manage Gloucestershire's residual waste, not waste from outside the county. To promote flexibility of the solution and further recycling above the minimum 60% target, the council would be open to views on the treatment of Gloucestershire's commercial waste. It is important to note that household waste represents only about a third or maybe less of the total waste produced in Gloucestershire.

Number 383 Type IND Name Bernard Gant Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I object strongly to the proposal of an incinerator to be sited at Wingmoor Farm Stoke Orchard. Firstly the road Infrastructure would have to be upgraded to cope with the extra traffic. Secondly, if waste is still to be brought in from Bristol junction 10 on the M5, the M5 would also have to be upgraded to allow access to and from the South. From a personal point of view using area C, the Cheltenham & District Clay Club grounds would mean the closeure of the club and unless compensation was paid the club would not survive. This club is not a rich man's club but predominately working class and having to move to a commercial ground would be too expensive. The club over the years have turned around an area of waste land into parkland and is enjoyed by many, it would be a real shame to spoil it. The clay club has over 200 members and many visitors. We also hold the National Mussel Loaders Championships and have hosted the World Mussel Loading Championships. In making your decision I would like the above points taken into consideration.

17. Officer Response.

Comments noted. PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. For the Wingmoor Farm sites, the assessment highlighted a potential net increase in traffic and potential capacity issues in some locations which may require mitigation such as junction improvements. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the inclusion criteria for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that this site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 174 Type IND Name Jacqueline Gardener Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

I do not believe it is best to concentrate the waste handling in a small area - it should be more evenly spread around the country.

2. Officer Response.

Comment noted. It is essential that the WCS provides a clear steer on the preferred location for new waste management facilities. 'Zone C' has been identified as the preferred location for a number of reasons which are clearly articulated within the site options consultation document including the fact that it avoids the floodplain and AONB, is consistent with Government Policy (PPS10) and the Regional Waste Strategy and the fact that Gloucester and Cheltenham are where most of the County's waste is produced. The focus on Zone C has been taken forward in the Publication WCS. Sites outside this area may come forward where there is market demand and such proposals will be considered on their merits having regard to relevant criteria.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
5. Land adjacent to Quadrant Business Centre		X	
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

This area already supports a disproportionate amount of waste handling.

4. Officer Response.

Comment noted. The re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Disagree

6. Please give a reason for your answer to Question 5.

I do not agree with the principle of the urban extensions

6. Officer Response.

Comment noted. The WCS has a role to play in ensuring all new development is underpinned by appropriate waste management infrastructure (e.g. recycling facilities). The site options consultation paper however focuses on identifying a site or sites suitable for accommodating a strategic waste management facility and there has been no interest from either waste operators or the developers leading the urban extensions in providing this type of facility as part of the development. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

Number 174 Type IND Name Jacqueline Gardener Organisation not applicable/not provided

I do not support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

I find this question misleading - it assumes that the main sites within Zone C are a foregone conclusion

8. Officer Response.

Comment noted. The main sites within Zone C are not a 'foregone conclusion'. The more dispersed sites (outside Zone C) were included in the WCS Site Options consultation as genuinely viable sites. This represented a very clear opportunity for the waste industry or landowners to indicate support for these or other dispersed sites. Deliverability is a key consideration in the selection and allocation process; there is no point in allocating sites that will not be developed for waste, or that the industry, for various reasons, views as a poor option. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

11. Do you support the approach of using a combination of sites within and outside Zone C?

I do not support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

I am not fundamentally against the processing of Gloucestershire waste in the area providing all appropriate recycling efforts are made first and suitable controls are in place but I do not believe that either of these considerations currently apply at Wingmoor Farm

12. Officer Response.

Comment noted. The County Council's target is to achieve at least 60% recycling and composting by 2020 with an aspiration for 70%. This is an ambitious target that exceeds the national target of 50% over the same period. However, even with effective recycling and composting initiatives there will always be an element of 'residual' waste (i.e. the waste leftover after composting and recycling) that will need to be treated or disposed of. In terms of reducing waste at source, the publication WCS includes a policy on waste minimisation aimed at reducing the amount of waste produced by development such as housing and employment. The Council also has a number of separate initiatives including its 'real nappies', 'junk mail' and 'love food hate waste' schemes.

Number 27 Type DNS Name Richard Geary Organisation Cheltenham Borough Council

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

4. Please give a reason for your answers to Question 3.

The Council welcomes the introduction of specific sites into the Waste Core Strategy, which will provide increased certainty for the public, stakeholders and waste services providers. However, we would also encourage the Waste Core Strategy to include a criteria based approach to additional/alternative sites that may come forward in the future. Furthermore, while we understand that this document focuses on strategic sites, a criteria based approach is considered most suitable for bringing forward smaller sites close to new or increased waste arisings. The Council would like to make the following comments about several specific sites, all of which are located relatively close to waste arisings within the Council's administrative boundaries. Wingmoor Farm In principle, the Council supports the use of existing waste treatment sites, as opposed to building new sites. We understand that there will be increases in traffic movements, with potential for associated increased noise, dust and lowering of air quality but feel that this is over-ridden by the benefits that result in terms of economies of scale and carbon savings that result from utilising central sites close to waste arisings. However, the consultation document does not specify the type of waste treatment facilities proposed at the suggested sites and, as such, potential hazards cannot properly be assessed. The Council would have very significant concerns if support for a specific site implied the processing of hazardous waste, and/or the production of toxic end products in a location close to centres of population. We are therefore restricted to commenting on the principle of waste treatment on these sites and reserve the right to object to specific uses at a later date. We have the following observations about the principle of waste treatment at these sites. Site 1 - Areas A, B & C at Wingmoor Farm East.The proximity of area C to the proposed urban extension at North West Cheltenham needs to be considered and, in practice, may prove unacceptably close. The Council reserves the right to object to specific uses on this site. Development of this site may have impacts on the Wingmoor Farm Meadow Gloucestershire Wildlife Trust Reserve and suitable mitigation measures may be required at the application stage. Development of this site has the potential to increase traffic on the A435, A4019 and A40 in and around Cheltenham. This increase in traffic needs to be considered in conjunction with increases which could result from the proposed urban extension at North West Cheltenham. Site 2 - Areas A, B & C at Wingmoor Farm West Area A is close to existing residential properties and the proposed urban extension at North West Cheltenham and, in practice, may prove unacceptably close. The specific type of facility promoted on the site will need to take into account the potential impact on existing residential properties and those that may come forward in the future. The Council reserves the right to object to specific uses on this site. Although the site is correctly shown outside the floodplain, consideration will need to be given to the potential for increased surface water flooding resulting from development of the site. This needs to be considered in conjunction with the proposed urban extension to the south of the site. Development of this site has the potential to increase traffic on the A435, A4019 and A40 in and around Cheltenham. This increase in traffic needs to be considered in conjunction with increases which could result from the proposed urban extension at North West Cheltenham. Site 10 - The Park, Wingmoor Farm West, The Council reserves the right to object to specific uses on this site. Development of this site has the potential to increase traffic on the A435, A4019 and A40 in and around Cheltenham. This increase in traffic needs to be considered in conjunction with increases which could result from the proposed urban extension at North West Cheltenham.

4. Officer Response.

The support for strategic site allocations is noted. The WPA agrees that the use of criteria-based policy is appropriate for dealing with smaller scale facilities as well as speculative development proposals. This will be reflected in the Publication WCS. The in principle support for waste treatment in the Wingmoor Farm area is noted. The site is close to Cheltenham, one of the major sources of waste in Gloucestershire and the treatment of waste close to source is consistent with national and regional policy. With regard to noise and dust, these are matters that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any sensitive receptors. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning conditions. Modern waste management facilities are not associated with deterioration in air quality. In terms of facility type, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable

Number 27 Type DNS Name Richard Geary Organisation Cheltenham Borough Council

of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10 which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. In any case, the focus of the facility will be treatment of residual municipal (mainly household) waste. It will not be intended to treat hazardous waste. Such waste will need to go to a specialist facility. With regard to Wingmoor Farm East, clearly the provision of new waste management facilities in urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source and the urban areas of Gloucester and Cheltenham are where most of Gloucestershire's waste is generated. This approach is consistent with national policy in PPS10, which emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. It is also consistent with the Regional Waste Strategy. It is also pertinent to note that the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. It is also the case that the NW extension to Cheltenham has not yet been confirmed. The RSS is potentially being abolished and as such there is some doubt as to whether the proposal will come forward. The Council is aware of the proximity of the sites to the Wingmoor Farm Meadow Key Wildlife Site. Should a detailed proposal come forward, suitable mitigation would be sought if necessary. With regard to traffic impact, the 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. For the Wingmoor Farm sites, the assessment highlighted a likely net increase in traffic and potential capacity issues at some locations requiring probable mitigation such as junction improvements. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. In relation to Wingmoor Farm West, see comments above in respect of proximity to residential properties. In terms of flood risk, whilst the site is outside the floodplain, any proposal of more than 1 hectare would need to be supported by a detailed Flood Risk Assessment (FRA). This would address the issue of potential surface water run-off and associated flood-risk. The use of sustainable drainage would also help to reduce surface water run-off. See comments above in respect of traffic impact. In relation to The Park, see comments above in respect of traffic impact.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

17. Do you have any comments on Section 3?

This consultation response relates to the specific issues raised by the Waste Core Strategy - Site Options Consultation Document in terms of the general suitability of sites for waste treatment. However, as the document does not specify the methods of treatment under consideration for each site, the Council reserves the right to make specific representations at a later date. The Council would also like to make it clear that any references to urban extensions proposed by the draft Regional Spatial Strategy for the South West (RSS) do not imply that they are supported and the Council remains opposed to significant elements of the RSS. The Council is specifically opposed to the construction of the so-called NW extension, for reasons which include its proximity to existing and proposed waste treatment sites. The Council has previously made representations on the Preferred Options Waste Core Strategy and this response should be read in the context of those representations.

17. Officer Response.

Comments noted.

Number 44 Type IND Name Claire Gee Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
4. Javelin Park, Haresfield		X	

4. Please give a reason for your answers to Question 3.

I particularly oppose JAVELIN PARK, near Haresfield, as a site because it is sited in an AONB and the development of a large incinerator would destroy this. The local road network, particularly the motorway junction 12, would not be able to support the inevitable increase in traffic. I would urge you to look to other areas of the country that have made mistakes in their choice of waste disposal methods and also to give great consideration to the views of the local residents, after all it is their homes, health and livelihood that will be at stake.

4. Officer Response.

Comments noted. Javelin Park is not located within the Cotswold Area of Outstanding Natural Beauty (AONB). This is located to the east of the site. The site is however visible from the AONB. In terms of incineration, the Council is currently technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10 which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. In terms of impact on the road network, the 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. For Javelin Park, the assessment shows the potential for a net decrease in traffic compared with that which could be generated if the current planning permission were to be implemented. The proximity to Junction 12 of the M5 is noted and if necessary contributions towards improving this junction may be sought should a waste facility come forward on this site. Any strategic site allocation made in the publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. In terms of health impact, PPS10, states that modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health. Furthermore, the detailed consideration of a waste process and the implications, if any, for human health is the responsibility of the pollution control authorities. PPS10 also states that where concerns about health are raised, waste planning authorities should avoid carrying out their own detailed assessments rather they should ensure, through drawing from Government advice and research and consultation with the relevant health authorities and agencies, that they have any advice on implications for health. The WPA duly sought the advice from the PCT/NHS through the site options consultation. The site has been taken forward into the Publication WCS because there is support from the landowners which greatly increases the prospects of delivery, the site is located close to Gloucester one of the county's main urban areas, the site enjoys good access to the strategic road network (SRN) is not at risk of flooding, has no other significant nearby environmental constraints and there are relatively few sensitive uses located nearby. Furthermore whilst the site is not currently in waste management use, it is previously developed (brownfield) land.

17. Do you have any comments on Section 3?

I write to object to the use of all 13 of the sites listed for possible waste treatment in Gloucestershire on the grounds that: Any of these sites could be used for incineration, which I strongly oppose for the following reasons: - Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. I understand that incineration contracts will be for at least 24 years, locking us into a 'solution' which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies

Number 44 Type IND Name Claire Gee Organisation not applicable/not provided

which are being rapidly developed. The long term costs to the taxpayer will be higher with incineration. Incinerators act as a disincentive to reduce, reuse and recycle. The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alterative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. Large incinerators in other areas of the country are already deemed to be a mistake.

17. Officer Response.

Comment noted. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 221 Type IND Name Rita Gerry Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Waste should be treated within minimum mileage from source to save the impact on the roads and to ensure no impact on the flood plain or AONB

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre	X		
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works		X	
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

I strongly object to any such development on green field sites, greenbelt areas or on sites which could have a potentially negative affect on wildlife or residents. I also do not feel it suitable to build such sites near to major rivers regardless of the current flood risk status. The sites that I have marked as being suitable are slightly further from the major cities but are on brown field sites such as old airfields which also have good existing transport links.

4. Officer Response.

Comments noted. Prioritising the use of previously developed land is consistent with Government policy however this does not mean that Greenfield sites cannot be considered at all. Most of the Greenfield sites identified in the site options consultation paper either have planning permission for employment use or have been allocated in a local plan for employment use. In terms of sites within the Green Belt, whilst it is acknowledged that the Green Belt should generally be protected, PPS10 emphasises that local authorities should 'recognise the particular locational needs of some types of waste management facilities when defining detailed green belt boundaries and, in determining planning applications. In line with the PPS10 companion guide, should any sites within the Green Belt be specifically allocated within the WCS, it will need to be clearly indicated that they are for waste management purposes only. In terms of impact on wildlife, the 13 sites have been subjected to an initial ecological assessment and deemed suitable. In terms of impact on residents, clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10 which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential

Number 221 Type IND Name Rita Gerry Organisation not applicable/not provided

development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. In terms of flood risk, all sites have been subjected to a flood risk assessment and deemed suitable. None are located in a flood risk area. Notwithstanding this, any proposal of more than 1 hectare in size would need to be supported by a site-specific Flood Risk Assessment (FRA) should a planning application come forward. Support for sites indicated noted.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

6. Please give a reason for your answer to Question 5.

Any such developments should be self-sufficient when it comes to disposal of additional waste.

6. Officer Response.

Support noted. The integration of waste management facilities into the urban extensions would allow waste from these developments and the wider Gloucester and Cheltenham area to be treated close to source in line with national and regional policy. However, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the Government's intention to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I'm not sure/I don't know

8. Please give a reason for your answer to Question 7.

As long as the purpose is purely to support the main sites then a site or sites outside of Zone C would be OK but there seems to be significant concerns about each of the currently identified potential sites.

8. Officer Response.

Comment noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester		X	
2. Hurst Farm, Lydney		X	
3. Land at Lydney Industrial Estate, Lydney		X	

10. Please give a reason for your answers to Question 9.

there seems to be concerns about each of these either for various environmental reasons

Number 221 Type IND Name Rita Gerry Organisation not applicable/not provided

10. Officer Response.

Comment noted. The sites have been identified from a long list of 329 sites taking into account a variety of factors including size, location, flood risk, landscaping, biodiversity, highways and availability. These three sites have the least constraints and have therefore been included. It is also important to note that statutory bodies such as the Environment Agency and Natural England are key consultees in relation to environmental issues. Both have been consulted on the site options and provided comments as part of this consultation process. Their comments will be used to help determine which sites are selected for inclusion within the WCS. Please also see response to Q8 in relation to sites outside of Zone C.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I'm not sure/I don't know

12. Please give a reason for your answer to Question 11.

Some use of sites outside of Zone C would seem to be practical as currently exists but the HRA risk levels seem high for 2 of the sites and I am concerned about the Foss Cross site being so close to a key Wildlife site and also being over a major high aquifer as well as the transport concerns expressed in the summary.

12. Officer Response.

Comment noted. A detailed HRA is being undertaken on all of the sites within the consultation document. In addition the Environment Agency is the statutory body responsible for issues such as the major high aquifer and they have provided detailed comments in relation to this. These comments will be taken into account in deciding which sites are taken forward into the Publication WCS.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

none

13. Officer Response.

Noted.

14. Do you have any comments on the Executive Summary?

good summary

14. Officer Response.

Support noted.

15. Do you have any comments on Section 1?

none

15. Officer Response.

Noted.

16. Do you have any comments on Section 2?

none

16. Officer Response.

Noted.

17. Do you have any comments on Section 3?

well laid out - good presentation of the options, maps etc.

17. Officer Response.

Number 221 Type IND Name Rita Gerry Organisation not applicable/not provided

Support noted.

18. Do you have any comments on Section 4?

none

18. Officer Response.

Noted.

19. Do you have any comments on the Sustainability Appraisal reports?

none

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

very useful especially the colour coding

20. Officer Response.

Support noted.

Number 168 Type DC Name Nigel Gibbons Organisation Forest of Dean District Council

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

It is considered preferable to use sites that already have waste related uses.

2. Officer Response.

Support noted. The use of existing waste sites is advocated in Government policy set out in PPS10 subject to careful consideration regarding the cumulative impact of development.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

Subject to environmental criteria being met there may be scope for smaller (possibly non strategic) waste site(s) for processing residual municipal waste within the Forest of Dean.

8. Officer Response.

Comment noted. The site options consultation identified 13 sites including 10 in Zone C and 3 outside. Sites were identified in all Districts with the exception of Cheltenham Borough where no suitable sites were available. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

10. Please give a reason for your answers to Question 9.

The site constraints as identified in the two site profiles for Lydney (attached) are supported but to them should be added comments about the proposed LDF strategy. This, as expressed in the emerging Core Strategy relies on encouraging higher quality development at Lydney, in particular mixed development on the Harbour Road site and a good range of employment on the Hurst farm site. A strategic brief in the form of an Area Action Plan is being prepared and it is considered vital that any emerging Waste allocation is compatible with the regeneration based aspirations of the District Council. Given the size of the two areas shown in the WCS document at Lydney, it is considered that they should be re considered with a view to defining smaller areas within them and in particular not indicating the frontage of the Harbour Rd site as suitable nor the land to the rear of Pine End Works. Should any sites be developed for strategic or more local waste related uses, it is vital that they are compatible with the regeneration plans for the areas concerned. The uses concerned should take account of the emerging Core Strategy and the AAP, and be compatible with the likely patterns of uses that are envisaged.

10. Officer Response.

Comments noted. The Waste Planning Authority accepts that there needs to be constructive compatibility with the emerging Forest of Dean Core Strategy and the AAP. Clearly, if an area of land at Hurst Farm is to be allocated then further clarification on a number of detailed matters is needed. Discussions will need to take place between the landowner, Developers with options on the land the District Council and the County Council in its role as Waste Planning Authority. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. These sites will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the sites forward as allocations at this stage does not mean that the sites are unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 168 Type DC Name Nigel Gibbons Organisation Forest of Dean District Council

17. Do you have any comments on Section 3?

The Forest of Dean District Council welcome further dialogue on the emerging waste plans, especially in respect of the potential for combined heat and power or other energy from waste projects and the potential for these within the district at Lydney or the Cinderford Northern Quarter.

17. Officer Response.

Comment noted. GCC will continue to engage with the Forest of Dean District Council in preparing the WCS.

Number 164 Type IND Name Dee Gibson-Wain Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I write to object strongly to the use of the 13 sites listed for possible waste treatment in Gloucestershire - but in particular to Javelin Park, Haresfield - on the grounds that: Any of these sites could be used for incineration, which I oppose. Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. The long term costs to the taxpayer will be higher with incineration. Incinerators act as a disincentive to reduce, reuse and recycle. The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. Large incinerators in other areas of the country are already deemed to be a mistake.

17. Officer Response.

With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 363 Type IND Name Caroline Gladstone Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

I understand that the suggested Waste sites are nearest to urban development

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre	X		
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester	X		
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

'Suitable' - I know the areas 'Don't know' - I do not know these areas 'Not Suitable' - Seems too near to residential properties

4. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10 which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Agree

6. Please give a reason for your answer to Question 5.

If the extensions are large, they will need facilities to dispose of their own rubbish

Number 363 Type IND Name Caroline Gladstone Organisation not applicable/not provided

6. Officer Response.

Support noted. The integration of waste management facilities into the urban extensions would allow waste from these developments and the wider Gloucester and Cheltenham area to be treated close to source in line with national and regional policy. However, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the Government's intention to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I'm not sure/I don't know

8. Please give a reason for your answer to Question 7.

I am not knowledgeable enough to answer this question

8. Officer Response.

Noted.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

I don't know these areas, but if you have convictions that you feel they are suitable, and have carried out sufficient research, then they are suitable

10. Officer Response.

Comment noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. These sites will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the sites forward as allocations at this stage does not mean that the sites are unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

I think the idea is good

12. Officer Response.

Support noted.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No

Number 363 Type IND Name Caroline Gladstone Organisation not applicable/not provided

13. Officer Response.

Noted.

14. Do you have any comments on the Executive Summary?

I have not had sufficient time to investigate this fully

14. Officer Response.

Comment noted.

15. Do you have any comments on Section 1?

I have not had sufficient time to investigate this fully

15. Officer Response.

Noted.

16. Do you have any comments on Section 2?

I have not had sufficient time to investigate this fully

16. Officer Response.

Comment noted.

17. Do you have any comments on Section 3?

I have not had sufficient time to investigate this fully

17. Officer Response.

Noted.

18. Do you have any comments on Section 4?

Yes. Junction 12 of the M5 needs to be enlarged whether or not local sites are built for the purpose of recycling

18. Officer Response.

Comment noted. The Publication WCS will specify any highway improvements needed to support the strategic site allocations.

19. Do you have any comments on the Sustainability Appraisal reports?

I have not had sufficient time to investigate this fully

19. Officer Response.

Comment noted.

20. Do you have any comments on the Habitat Regulations report?

I have not had sufficient time to investigate this fully

20. Officer Response.

Noted.

Number 250 Type IND Name Kevin Glass Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch		X	
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre	X		
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester	X		
8. Nastend Farm, Stroudwater Business Park	X		
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

I think the waste site would be better suited to be in the Gloucester area. Gloucester is the largest town/city in the area and this is where most of the waste will come from.

4. Officer Response.

Comment noted. A number of sites in and around Gloucester have been identified. Gloucester along with Cheltenham is where most waste in Gloucestershire is generated. Treating this waste as close to source as possible is consistent with national and regional policy.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

6. Please give a reason for your answer to Question 5.

Each new development should include possible waste treatment areas as they will comtribute to the waste.

6. Officer Response.

Support noted. However, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the Government's intention to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

The areas identified seem to be low population. Waste sites should be located in low population areas.

Number 250 Type IND Name Kevin Glass Organisation not applicable/not provided

8. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source and the urban areas of Gloucester and Cheltenham are where most of Gloucestershire's waste is generated. This approach is consistent with national policy in PPS10, which emphasises that planning strategies should 'provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities'. It is also consistent with regional policy. It is also pertinent to note that the companion guide to PPS10 states that, 'with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development'. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney	X		
3. Land at Lydney Industrial Estate, Lydney	X		

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

14. Do you have any comments on the Executive Summary?

No

14. Officer Response.

noted

15. Do you have any comments on Section 1?

No

15. Officer Response.

noted

16. Do you have any comments on Section 2?

As stated in section 2.17 'The focus of new waste management facilities should be the region's 'Strategically Significant Cities and Towns' (SSCTs) which includes Gloucester and Cheltenham' 'in 'close proximity' to the urban area primarily served by the facility (defined as within 16km).'. I think the waste site should be located in the town which contributes the most to the waste problem. Ideally within 1-2 miles of the town.

16. Officer Response.

Support for the RSS sequential approach noted. This has been a key consideration in determining the preferred locational strategy and individual sites identified.

17. Do you have any comments on Section 3?

Site Number 3. Section Environmental & other constraints: I do not agree will the following text highlighted in the highways part. 'There are limited amounts of residential properties nearby' There are many residental properties in the nearby area. After all the problems wuth flooding in the area, a waste site located next to

Number 250 Type IND Name Kevin Glass Organisation not applicable/not provided

their property would not be fair. Also Tewkesbury will NOT be producing a much waste compared to Gloucester and Cheltenham. Ideally a waste site should not be located within 1 mile of any residential property. The site would be better used for commerical building to replace the previous commerical building located their.

17. Officer Response.

Comment noted. Please see response to Q8. In relation to Easter Park, the site has not been taken forward into the Publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

18. Do you have any comments on Section 4?

No

18. Officer Response.

Noted.

19. Do you have any comments on the Sustainability Appraisal reports?

Note 12 'Limited number of sites in or very close to the RSS named settlements of Cirencester, Coleford, Tewkesbury, Stroud, and Lydney' I do not think these areas should have been considered. There relative small population compared to Chelthenham and Gloucester should remove them from the list.

19. Officer Response.

Comments noted. These areas were looked at as part of a more dispersed strategy. The consideration of sites suitable for meeting the needs of smaller towns and rural areas is consistent with regional waste policy. It is essential that the WCS provides a clear strategy setting out what will be built and where. This will provide certainty and confidence to the development industry and help bring proposals forward. The Council's preferred strategy is to focus the location of new strategic waste management facilities on the area defined as Zone C. This approach is considered to be consistent with national policy (PPS10) and the Regional Waste Strategy. Although the preferred focus for strategic waste management is Zone C, a number of other sites were identified outside this zone in the Forest of Dean and Cotswold District in order to provide suitable flexibility and support for the Zone C sites. Please see also response to Q8.

20. Do you have any comments on the Habitat Regulations report?

Page 33. Re "Severn Ham SSSI was recorded at just over a distance of 1 km. This assessment only considered International / European sites within 1 km. I think the assesment should extend the enviromental areas to a range of at least 5km.

20. Officer Response.

Comment noted. The Severn Ham SSSI is not an International or European site. All International / European sites have been appropriately screened both through the Habitats Regulations Assessment (HRA) Screening Report of the WCS Site Options and through the further ongoing HRA modelling work in liaison with Natural England.

Number 265 Type CCLLR Name Terry Glastonbury Organisation County Councillors

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

I support the approach to focus the search for strategic waste sites defined on the area defined as Zone C because this seems the best area for substainability, such as road network etc.

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch		X	
4. Javelin Park, Haresfield	X		
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park		X	
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

The sites have marked as suitable I consider the most easy access and less affect on traffic. The three I have selected as unsuitable are to close to heavy traffic flows and to built up.

4. Officer Response.

Comments noted. PPS10 states that waste management should be considered alongside other spatial planning concerns including transport. As part of the process of site selection, all sites were subjected to an initial assessment by Gloucestershire Highways. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways with any necessary mitigation (e.g. junction improvements) clearly identified as site-specific requirements. Should a planning application be progressed on any of the strategic site allocations this would need be supported by a detailed Transport Assessment and Travel Plan. In terms of proximity to the built up area, clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10 , which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

Number 265 Type CCLLR Name Terry Glastonbury Organisation County Councillors

7. Do you support the identification of sites outside Zone C?

I do not support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

These sites would be useful as waste transfer sites, and would cut down on journeys carring large amounts of waste by using a local recycling facility.

8. Officer Response.

Comments noted. It is essential that the WCS provides a clear strategy setting out what will be built and where. This will provide certainty and confidence to the development industry and help bring proposals forward. The Council's preferred strategy is to focus the location of new strategic waste management facilities on the area defined as Zone C. This approach is considered to be consistent with national policy (PPS10) and the Regional Waste Strategy. Although the preferred focus for strategic waste management is Zone C, a number of other sites were identified outside this zone in the Forest of Dean and Cotswold District in order to provide suitable flexibility and support for the Zone C sites. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney	X		
3. Land at Lydney Industrial Estate, Lydney		X	

10. Please give a reason for your answers to Question 9.

1a I dont know the area 2a In the local plan defined land defined as industrial land (a little worried about the new housing development planned opposite this site) 3a already industrial land, concerned about the Lydney area Action Plan proposal for leisure use at the Harbour.

10. Officer Response.

Comments noted. In respect of site 2a Hurst Farm, the WPA recognises that more housing is planned for this area. It should be stated that the close proximity of housing and other sensitive receptors does not necessarily or automatically mean that a nearby waste use is unacceptable. Paragraph 7.31 of the Companion Guide to PPS10 states that "With advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development". In respect of Site 3a Lydney Industrial Estate, the fact that the site is already in industrial use is one of the reasons that it was identified. Modern waste management facilities are acknowledged to be generally compatible with industrial uses. It is acknowledged that there needs to be constructive compatibility with the emerging Forest of Dean Core Strategy and the Area Action Plan (AAP) for the Harbour. There is nothing to suggest that a waste facility located at the industrial estate would impinge on the objectives of these strategies/proposals. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. These sites will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the sites forward as allocations at this stage does not mean that the sites are unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

Number 265 Type CCLLR Name Terry Glastonbury Organisation County Councillors

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

Perhaps less transport mileage by treating waste local

12. Officer Response.

Support noted. Whilst the Council's preferred strategy is to provide strategic waste management facilities within Zone C, there is likely to be a role for sites outside this area e.g. smaller scale provision or supporting infrastructure e.g. waste transfer. On balance having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the publication Waste Core Strategy (WCS). It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the Waste Core Strategy (WCS) national policy and any other material considerations.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No

13. Officer Response.

Noted.

17. Do you have any comments on Section 3?

The main issue I have is sustainabilty and affect on local poulation. I favour the site that means less easier road transport and leased density of housing.

17. Officer Response.

Comments noted. Dealing with each in turn. With regard to sustainability, the site options have been subjected to a Sustainability Appraisal (SA) with the SA report published separately alongside. A final SA report will be published alongside the publication WCS prior to submission to the Secretary of State. In terms of affecting local populations, clearly the provision of new waste management facilities in urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source and the urban areas of Gloucester and Cheltenham are where most of Gloucestershire's waste is generated. This approach is consistent with national and regional policy. In terms of transport, PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan.

Number 108 Type IND Name Francis Gobey Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I write to object to the use of all 13 of the sites listed for possible waste treatment in Gloucestershire on the grounds that: a.. Any of these sites could be used for incineration, which I oppose. b.. Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. c.. I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. d.. The long term costs to the taxpayer will be higher with incineration. e.. Incinerators act as a disincentive to reduce, reuse and recycle. f.. The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas. g.. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. h.. Large incinerators in other areas of the country are already deemed to be a mistake.

17. Officer Response.

With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 362 Type IND Name Francis Gobey Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

But only on condition that the waste disposal technology is the best available in low impact & energy - that is not incineration.

2. Officer Response.

Support for Zone C noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. AD is not a residual waste technology as such; it treates biodegrabable waste. There are developing markets for the outputs from AD, such as using the biogas produced, but the process has not been proven on residual waste alone. A key aspect of evaluating the residual waste project bids will be the balance between the deliverability and risk associated with new technologies against the risk of the technology and markets failing.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

Depends on technology. No sites suitable for incineration.

4. Officer Response.

Comment noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to

Number 362 Type IND Name Francis Gobey Organisation not applicable/not provided

PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Agree

6. Please give a reason for your answer to Question 5.

All new development must include local waste treatment to minimise transport & CO2 and maximise composting & recycling. If clean disposal is ok for Zone C it is ok for anywhere.

6. Officer Response.

Support noted. The integration of waste management facilities into the urban extensions would allow waste from these developments and the wider Gloucester and Cheltenham area to be treated close to source in line with national and regional policy. However, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the Government's intention to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

As above: Localising waste treatment

8. Officer Response.

Support noted, however, on balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney	X		
3. Land at Lydney Industrial Estate, Lydney	X		

10. Please give a reason for your answers to Question 9.

depends on technology as above

10. Officer Response.

Comment noted. See previous response.

11. Do you support the approach of using a combination of sites within and outside Zone C?

Number 362 Type IND Name Francis Gobey Organisation not applicable/not provided

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

as above - no nimbyism

12. Officer Response.

Support noted. See previous response.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

no

13. Officer Response.

Noted.

14. Do you have any comments on the Executive Summary?

avoids key discussion of clean technology & transport factors

14. Officer Response.

Comment noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW).The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by a further highway assessment with any necessary mitigation (e.g. junction improvements) clearly identified as site-specific requirements. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan.

Number 430 Type LAC Name janet Goddard Organisation Sunhull Action Group

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Zone C is more urban, therefore less distance to transport waste, thereby less use of fuel and less emissions and fewer lorries on the roads.

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre	X		
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Agree

6. Please give a reason for your answer to Question 5.

Less distance to transport it.

6. Officer Response.

Support noted. The integration of waste management facilities into the urban extensions would allow waste from these developments and the wider Gloucester and Cheltenham area to be treated close to source in line with national and regional policy. However, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I do not support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

Same reasons as for the above. Logistically, environmentally, it makes sense not to transport waste for miles. Also why spoil the few remaining unspoilt ares that are

Number 430 Type LAC Name janet Goddard Organisation Sunhull Action Group

left.

8. Officer Response.

Comment noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

11. Do you support the approach of using a combination of sites within and outside Zone C?

I do not support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

Keep the countryside as countryside..not urbanize it and spoil it.

12. Officer Response.

Comment noted. Whilst the Council's preferred strategy is to provide strategic waste management facilities within Zone C, there is likely to be a role for sites outside this area e.g. smaller scale provision or supporting infrastructure e.g. waste transfer. There will therefore be no despoiling of countryside. On balance having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the publication Waste Core Strategy (WCS). It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the Waste Core Strategy (WCS) national policy and any other material considerations.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

Sunhill. Between Barnsley Cross and Poulton. Roads FAR too narrow to cope with heavy traffic, particularly as there are some blind corners and would be dangerous. Too far from where the waste is going to come from, therefore again greater use of fuel, more pollution and traffic on rural roads.

13. Officer Response.

Sunhill was initially investigated (ref Site 039) and the landowner promoted the site as being available for residual MSW treatment. However, this site was found to fall outside of the 16km boundary from the fringe of the urban areas of Cheltenham and Gloucester and therefore no further assessment was carried out on the site. Please refer to Section 4 and Appendix A of Technical Evidence Paper WCS-N and page 12 of Technical Evidence Paper WCS-O.

Number 426 Type IND Name Jane Godsell Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

AONB should be avoided. Flooding areas to be avoided.

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield	X		
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

Javelin Park would have a low impact on population and environment, also Moreton Valence site. Both have good access for vehicles. Do not believe it should be one site. Nastend Farm is a very congested area, major impact on local population, traffic and environment so unsuitable.

4. Officer Response.

Support for Javelin Park and Moreton Valence noted. Comment in relation to number of sites noted. At the present time it is not clear whether one large facility will be delivered or several smaller facilities. The site options consultation paper identified 13 potential sites in order to provide a suitable degree of flexibility. The council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the county. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. The advantages and disadvantages would be investigated further during procurement process. With regard to Site 8, Nastend farm, the site has not been taken forward into the publication WCS because although the County Council is the landowner, following discussions with the County Council's Waste Disposal Authority (WDA) it would appear that there is significant uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore, the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this

Number 426 Type IND Name Jane Godsell Organisation not applicable/not provided

will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Disagree

6. Please give a reason for your answer to Question 5.

Urban areas are not suitable for waste treatment.

6. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should `provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, `with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the `proximity principle' (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. Notwithstanding this, it is significant to note that the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a waste treatment facility or facilities as part of those proposals. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I do not support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

AONB should be avoided. Flooding areas to be avoided Populated areas to be avoided

8. Officer Response.

Comment noted. Importantly, Foss Cross was the only site in the WCS Site Options consultation document located within the AONB. It is also relevant to note that the site already accommodates an existing household recycling centre (HRC). On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS national policy and any other material considerations. Major flood risk areas have been avoided through the process of undertaking a Strategic Flood Risk Assessment (SFRA). Notwithstanding this, any proposal of more than 1 hectare would need to be supported by a site-specific Flood Risk Assessment (FRA). With regard to populated areas, clearly the provision of new waste management facilities in urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source and the urban areas of Gloucester and Cheltenham are where most of Gloucestershire's waste is generated. This approach is consistent with national policy in PPS10, which emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. It is also consistent with regional policy. It is also pertinent to note that the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste

Number 426 Type IND Name Jane Godsell Organisation not applicable/not provided

facilities may also be considered as light industrial in nature and therefore compatible with residential development.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester		X	
2. Hurst Farm, Lydney		X	
3. Land at Lydney Industrial Estate, Lydney		X	

10. Please give a reason for your answers to Question 9.

As Q8

10. Officer Response.

See previous response.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I do not support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

As Q8

12. Officer Response.

See previous response.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

no

13. Officer Response.

Noted.

14. Do you have any comments on the Executive Summary?

no

14. Officer Response.

Noted.

16. Do you have any comments on Section 2?

no

16. Officer Response.

Noted.

18. Do you have any comments on Section 4?

no

18. Officer Response.

Noted.

19. Do you have any comments on the Sustainability Appraisal reports?

Number 426 Type IND Name Jane Godsell Organisation not applicable/not provided

no

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

no

20. Officer Response.

Noted.

Number 77 Type IND Name J Godwin Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

I'm writing to protest about the proposed use of my shooting club - Cheltenham and District Clay Club, Stoke Orchard, to be used for the treatment of waste. The club is very popular, always a waiting list for members to join. There is very poor provision of our sport and I feel very upset that it might be taken away; particularly as other sites being considered don't have an activity located on them. The area has been carefully developed with over 400 trees being planted - an important consideration in view of the fact of the greenhouse gas effect! Site access by big Lorries is poor - the local inhabitants have to contend with a lot of traffic already. The area has poor access to main roads and to the motorway, some proposed sites have almost direct/adjacent access to the motorway and again more of the others already have a very popular activity upon them. As a family myself, my husband and two sons come to Stoke Orchard to shoot. We often bring guests to shoot. Please re-consider our club. We cause no harm to anyone, it is extremely well run and everyone on the club membership is law abiding - we would not be allowed gun permits by the police if we were not. Indeed we are more 'checked' than anyone else.

4. Officer Response.

Comment noted. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the 'inclusion criteria' for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that his site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 332 Type IND Name David Goodhall Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

It allows for the safe disposal of waste without having to transport it over great distances.

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X	X	
4. Javelin Park, Haresfield		X	
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence		X	
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West			

4. Please give a reason for your answers to Question 3.

This allows for the waste to be disposed of without impacting on the business community, and the need for a safe working environment. Also for future expension.

4. Officer Response.

Support for Wingmoor Farm sites noted. The re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

6. Please give a reason for your answer to Question 5.

I have no opinion on this matter.

6. Officer Response.

Comment noted.

7. Do you support the identification of sites outside Zone C?

I do not support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

I see no need to expand beyond thos areas identified.

8. Officer Response.

Number 332 Type IND Name David Goodhall Organisation not applicable/not provided

Comment noted.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester		X	
2. Hurst Farm, Lydney	X		
3. Land at Lydney Industrial Estate, Lydney		X	

10. Please give a reason for your answers to Question 9.

I do not like waste sites on industrial/trading estates.

10. Officer Response.

Comment noted. PPS10 states that when searching for sites waste planning authorities should consider a broad range of locations including industrial sites.The Companion Guide to PPS10 also indicates that industrial estates / sites can be suitable areas for waste management facilities. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. These sites will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the sites forward as allocations at this stage does not mean that the sites are unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I do not support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

I consider zone 'C' as suitable, therefore no need to seek alternatives.

12. Officer Response.

Comment noted.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No.

13. Officer Response.

Noted.

14. Do you have any comments on the Executive Summary?

Well thought out and presented.

14. Officer Response.

Support noted.

15. Do you have any comments on Section 1?

Gave sufficient information.

15. Officer Response.

Support noted.

Number 332 Type IND Name David Goodhall Organisation not applicable/not provided

16. Do you have any comments on Section 2?

Well considered.

16. Officer Response.

Support noted.

17. Do you have any comments on Section 3?

Generaly well presented and clearly identified.

17. Officer Response.

Support noted.

18. Do you have any comments on Section 4?

Should be managable to deliver in the time allocated.

18. Officer Response.

Support noted.

19. Do you have any comments on the Sustainability Appraisal reports?

Spells out the needs very well.

19. Officer Response.

Support noted.

20. Do you have any comments on the Habitat Regulations report?

As for Q19.

20. Officer Response.

Support noted.

Number 51 Type IND Name John Goolden Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	

4. Please give a reason for your answers to Question 3.

I am writing to you to put forward my objections to the potential development of the site, Area C at Wingmoor Farm East, as suggested in the consultation of the identified site in the area. The reasons for my objections, from the details that have been made public, are the potential impact the proposed development will have on my recreational sport, clay shooting, which I undertake at the Cheltenham & District Clay Club, The Park, Stoke Orchard, Cheltenham. I have been a full member of the clay club for two years now, along with my sons, Andrew (17) and Edward (15), who are both junior members of the club. Myself and my sons are enjoying being members and shoot regularly on a Sunday morning. I would be concerned if any development would disrupt my regular shooting. The current site of the clay club has been very well run for many years and appears to be in an excellent location. This location could be difficult to replicate in another area, if another site for the clay club had to be found. I know the Committee of the Cheltenham & District Clay Club are making their objections known to you, though I thought I would add my letter on behalf of myself and my sons.

4. Officer Response.

Comments noted. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the 'inclusion criteria' for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that his site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 346 Type PC Name Peter Gough Organisation Longford Parish Council

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Forest of Dean need to recylce their share of waste generated in this area - possible site owned by Robert Hitchins, if planning consent for houses is not given this site could be used perhaps this is the reason why forest district council will relent on this proposed development. Many areas in Zone C would not be flooded, the access road roads wold be flooded in severe weather conditions. This should be obvious?

2. Officer Response.

Comment noted. The Site Options consultation paper identified 2 potential sites within the Forest of Dean area. Other sites were identified in an initial long-list but excluded for a number of reasons including site size, location, flood risk, highways and deliverability.
In terms of flood risk within Zone C, although it does include some areas of flood risk, Zone C has been delineated in order to avoid the large areas of floodplain located in the western part of the County thereby minimising risk. It is pertinent to note that should a planning application come forward, any development over 1 hectare in size would need to be accompanied by a site-specific Flood Risk Assessment (FRA) with any necessary mitigation identified as appropriate.

4. Please give a reason for your answers to Question 3.

All of the sites need to be included and more have to be brought forward depending on the process used. We all have to take responsibility for waste generated in our area. Cotswolds, forest of dean, Stroud, Cheltenham, Tewkesbury, Gloucester. Cotwolds - Stroud must be forced to have sites in their localities to comly

4. Officer Response.

Comments noted. It is worth noting that the Site Options consultation paper included sites in all Gloucestershire Districts/Boroughs other than Cheltenham where no suitable sites were found to be available and therefore deliverable. The council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites whether multiple or a single site is proposed. However GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Agree

6. Please give a reason for your answer to Question 5.

Having a responsibility for waste generated in your area in more likely people.

6. Officer Response.

Support noted. The WCS has a role to play in ensuring all new development is underpinned by appropriate waste management infrastructure (e.g. recycling facilities). The site options consultation paper however focuses on identifying a site or sites suitable for accommodating a strategic waste management facility and there has been no interest from either waste operators or the developers leading the urban extensions in providing this type of facility as part of the development. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

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40% of proposed sites are located in the Tewkesbury Borough. Do you realisticaly think residents will support this daft proposal,

8. Officer Response.

Comment noted. The 13 sites were identified from a long-list of 329 sites having regard to a number of factors such as site size, location, flood risk, highways and availability. With the exception of Cheltenham Borough where no suitable sites were available, sites have been identified in each District. No particular weighting has been applied to Tewkesbury Borough it just happens to be the case that most of the suitable available sites are located there. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney	X		
3. Land at Lydney Industrial Estate, Lydney	X		

10. Please give a reason for your answers to Question 9.

These sites would process waste from the locality they were generated from. Again we must all share this responsibility through the County with no exception.

10. Officer Response.

Support noted. The WCS has a role to play in ensuring all new development is underpinned by appropriate waste management infrastructure (e.g. recycling facilities). The site options consultation paper however focuses on identifying a site or sites suitable for accommodating a strategic waste management facility and there has been no interest from either waste operators or the developers leading the urban extensions in providing this type of facility as part of the development. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead their waste management requirements will be addressed through the general policies and requirements of the WCS.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

Al the sites are suitable for certain elements of the waste disposal system. Sme have distinct advantages over others. Transportation of waste is a major contribution to polution.

12. Officer Response.

Support noted.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

Perhaps better publication would lead to more appropriate sites taken into consideration

13. Officer Response.

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Noted. A call for sites was made which was sent to all waste operators and interested parties on the minerals and waste database. Over 300 sites were initially identified within the county. Technical assessments were carried out on over 100 of these sites. As part of the technical assessment work, a deliverability study was undertaken and landowners were contacted to see whether the parcel of land in question was available. Landowners were also asked if they had any other land available within Gloucestershire. The consultation was formally advertised in Gloucestershire papers on 2 occasions with a full and double-page spread. Each edition had a readership of 164,423; 130 posters were circulated to offices and libraries in the county. A pre-mail out and a consultation letter was sent to 350 business managers and 1,710 residents within 250m+ of the sites and the consultation launch letter was also sent to 1,200 stakeholders. All Area Liaison Officers, Village and Community Agents, Parish Clerks, County Councillors and MPs were notified. Roadshows were held and further advertising and information was made available on GCC's website.

14. Do you have any comments on the Executive Summary?

as per included letter

14. Officer Response.

Comments noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. It is essential that the WCS provides a clear strategy setting out what will be built and where. This will provide certainty and confidence to the development industry and help bring proposals forward. The Council's preferred strategy is to focus the location of new strategic waste management facilities on the area defined as Zone C. This approach is considered to be consistent with national policy (PPS10) and the Regional Waste Strategy. Although the preferred focus for strategic waste management is Zone C, a number of other sites were identified outside this zone in the Forest of Dean and Cotswold District in order to provide suitable flexibility and support for the Zone C sites. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

15. Do you have any comments on Section 1?

Not enough thought has gone into this process, you should be recomending processes and sites and giving good reason for their inclusion. You know the answer so why ask the public.

15. Officer Response.

Comment noted. As a WCS prepared in line with appropriate guidance, the consultation focused on sites only. This is because at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology.

16. Do you have any comments on Section 2?

none

16. Officer Response.

Noted.

17. Do you have any comments on Section 3?

none

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17. Officer Response.

Noted.

18. Do you have any comments on Section 4?

none

18. Officer Response.

Noted.

19. Do you have any comments on the Sustainability Appraisal reports?

none

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

none

20. Officer Response.

Noted.

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1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

environmental logic

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X		
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park	X		
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			

4. Please give a reason for your answers to Question 3.

I marked three sites as 'don't know' because this questionnaire does not allow for the following answers: 5. this site is close to residential housing and so the size and technology proposed will be very sensitive. Also the impact of any residual waste facility on the busy side of the M5 J12 (ie Gloucester side) on traffic needs to be considered 7. This site already has a recycling facility (waste transfer) and the additional land purchased here by the owner might support additional waste transfer. But it is even closer to residential land and the highways access is a serious issue. this would not be an appropriate site for eg an incinerator. 9. the access here is over a very narrow bridge through a residential road. the impact of eg an anerobic digestion plant eg for food waste should not have a large impact on nearby residents compared to the current sewage treatment, but this needs to be analysed carefully

4. Officer Response.

Site 5 - Notwithstanding the above, the site has not been taken forward into the Publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations. Site 7 - Notwithstanding the above, the site has not been taken forward into the Publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of

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particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the Publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.Site 9 - Notwithstanding the above, the site has not been taken forward into the Publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore, the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the Publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. The site's existing Anaerobic Digestion (AD) capacity for waste water and other assorted wastes is recognised and any additional increase in these facilities would be considered through other criteria-based policies in the WCS.

6. Please give a reason for your answer to Question 5.

The answers do not relate to the question. I strongly disagree with the entire RSS document, which has no democratic support and whose consultation was a farce. However the RSS is now dead in the water: only the last rites need to be said over this much unloved regional policy. So does that not make this question redundant?

6. Officer Response.

Comment noted. The Government's intention to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

Local waste handling of local waste is an attractive concept. It reduces transport costs, and counters opposition in any one place to a large single solution. This has to be balanced against the cost of several different sites. The use of different technologies in different sites may also be attractive, and reduces the hazard of one site having difficulties - 'don't have your eggs in one basket'

8. Officer Response.

Support noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It

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should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

Haven't visited the Lydney sites. Fosse Cross may only work on a small scale as rural - quite a distance for the transport of much waste?

10. Officer Response.

Foss Cross would not be considered suitable for a large-scale facility and would only be suitable for a small-scale facility to support a strategic network of sites. It is highly unlikely that waste would be imported to Foss Cross from outside of the AONB because the purpose of including smaller dispersed sites would be allow waste to be treated closer to its arisings and improve sustainability. At this stage, without detailed modelling, it would not be possible to say for certain how this would affect lorry movements. Please also see response to Q8.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

As above.

12. Officer Response.

See previous responses.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

I am surprised a site at Sharpness, in combination with using the canal for transport, and working with landowner BW for additional housing - where waste to energy plant could generate cheap heating for housing - has not been considered. NO doubt there would be many technical difficulties but to rule out so early seems curious.

13. Officer Response.

The Sharpness Docks area did have some technical assessments carried out on it and two other parcels of land were submitted as part of the call for sites exercise. However, the landowners of the Sharpness Docks area (Site 547) indicated that the land was not available for residual waste management treatment and of the other parcels submitted one was in conflict with the landowners wishes and the other did not fulfil the 'inclusion criteria' outlined in Technical Evidence Paper WCS-N. For details of site 547 assessments please see Technical Evidence Paper WCS-N and its appendix C.89 and for the other parcels please refer to Technical Evidence Paper WCS-O (pages 30 and 31)

14. Do you have any comments on the Executive Summary?

Odd that there is no date attached to the 60% recycling target. Strange later too that there seems to be no risk assessment of whether eg the 150,000 tonnes of residual waste projected p.a. might be too much if we seriously improve our recycling rates: how would any considerable reduction affect the type of facility

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required; likewise what iof there was a significant increase in nos of residents within the county and the 150,000 tones figure proved an under estimate?

14. Officer Response.

Comment noted. The County Council's target is to achieve at least 60% recycling and composting by 2020 with an aspiration for 70%. This will be clearly explained in the publication WCS. In terms of risk assessment, it is important to note that the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces.

16. Do you have any comments on Section 2?

as above

16. Officer Response.

See previous response.

18. Do you have any comments on Section 4?

as above

18. Officer Response.

Comment noted. The 60% recycling target is derived from the Joint Municipal Waste Management Strategy (2007 -2020). The strategy states that the 60% recycling and composting target will be achieved by 2019/20. As stated in the site options consultation paper (refer page 24), the 150,000 tonnes of residual waste per annum is an estimate based on how much waste is being produced now, how much is likely to be produced in the future and assumes the Council achieves its recycling target of 60%. This estimate takes into account future likely population increases. The amount of residual waste having to be treated could however be as much as 270,000 tonnes per annum. The RSS assumes a maximum secondary treatment facility of 200,000 tonnes per annum which lies in the middle of this range. All of the sites identified in the site options consultation paper are capable of accommodating a facility of at least 50,000 tonnes per annum, thereby providing a suitable degree of flexibility.

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1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

The approach of focusing the search for strategic waste sites in the area of 'Zone C' is supported as it is consistent with the EU Waste Framework Directive 2008, national planning policy i.e. Planning Policy Statement 10: Planning for Sustainable Waste Management and the Waste Strategy for England 2007 and Draft Regional Spatial Strategy (RSS) for the South East, which all aim for waste to be disposed of in one of the nearest appropriate installations (Paragraph 3 of PPS10). This will contribute to reducing the level of waste miles travelled and provide a more sustainable facility. The sites within 'Zone C' are all located beyond the floodplain and the Cotswolds AONB.

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch			
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre	X		
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works		X	
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

1. This site comprises three separate parcels of land and is adjacent to an existing landfill / landraise site. Although the sites are not ecologically rich there is a key Wildlife Site within 500m of Areas A and B. There are considered to be no significant flood issues, as the site is in Flood Zone 1 (EA Flood Data). There are residential properties, a farm and a business park within 250m of the boundary. The site lies within the Green Belt where development of the type necessary to deliver a strategic waste facility is considered to be 'inappropriate' unless very special circumstances can be demonstrated. The harm, by reason of inappropriateness, and any other harm, should be outweighed by the very special circumstances (PPG2). This is not considered to be the case in this instance. 2. This site also consists of three separate parcels of land and is located to the west of the existing Wingmoor Farm West landfill site. There are relatively few sensitive receptors such as residential dwellings in the vicinity and it is not clear if there would be an effect on biodiversity. The site lies within the Green Belt and is not considered to be suitable for the same reasons as site 1, as a strategic waste development of this type would constitute inappropriate development in the Green Belt. Traffic levels on the local road network would increase and lead to problems at junctions of the A435. 3. This site is considered suitable as there is good access to the M5 at Junction 9 and the traffic levels resulting from the waste development would not be significantly higher than the existing situation. There are no significant areas of biodiversity, the site lies within Flood Zone 1. As the site is within a large business park / industrial estate the waste development would not have a significant visual impact on the area. There are residential properties within 250m of the site; however these are north of existing buildings located between the site and the dwellings. 4. Javelin Park is

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considered to be the most suitable of the ten identified sites. It is previously developed land and priority is given to the re-use of previously developed land (Paragraph 21 pf PPS10). There are no significant ecological or flooding issues and the there is only one residential property within 250m of the site. The access to the site is very good due to the proximity to Junction 12 of the M5 motorway. The site is available and deliverable as it is partially owned by Gloucestershire County Council and the owner of the remainder of the site has indicated it is potentially available. 5. This site is previously developed land and is considered to be suitable as there are no known ecological or flooding issues and it is set within an existing business park. There are few sensitive receptors such as residential dwellings within 250m and the site is available and deliverable. Although the waste development could increase the levels of traffic on the local road network, in the longer term highway improvements could be made to mitigate the traffic issues. 6. This site is generally considered to be suitable as it is an existing C&D and C&I waste facility with good access to the M5 motorway. There are no biodiversity or flooding issues and there are only a few residential properties within 250m of the boundary of the site. The land owners have confirmed the site is available and deliverable. 7. This is an existing waste transfer site; however it is not considered to be suitable for a strategic waste one site solution due to the configuration of the site and the difficult access to the strategic road network. There are residential areas in close proximity to the site as well as additional proposed new housing. 8. This site is allocated in the Stroud Local Plan for future employment uses although it is not previously developed land. There could be a potential negative effect on biodiversity due to the proximity of BAP habitats and there are residential properties and businesses within 250m of the boundary of the site. The increase in traffic levels would exacerbate existing congestion issues on nearby local roads and junctions. It is therefore not considered a suitable site. 9. Netheridge Sewage Treatments Works is not considered to be a suitable site as it would require configuration and could not accommodate a one site solution. There could potentially be ecological and flooding issues and the site is within 250m of residential properties. There are existing capacity constraints on the local road network which would be made worse as a result of the waste facility being located at this site. 10. This identified industrial estate has existing waste management uses, is close to a HRC and an active landfill. There would be no significant effects on biodiversity and no flooding risks. This site lies within the Green Belt however, where a development of this type is inappropriate unless very special circumstances exist that outweigh the harm that would be caused to the Green Belt. This site is not considered to be suitable for a strategic waste use as it conflicts with national Green Belt planning policy (PPG2).

4. Officer Response.

Support for sites (Easter Park, Javelin Park, Quadrant, Moreton Valence) noted. Objections considered in turn below. 1. Areas A, B, C Wingmoor East - The presence of the Key Wildlife Site (KWS) is acknowledged. An initial biodiversity assessment of each site was carried out in support of the site options consultation. Should a detailed proposal come forward through a planning application, this would need to be supported by a more detailed assessment with any mitigation identified as necessary. Although there are properties within relatively close proximity of the three sites, this is not considered to preclude the possibility of development. In respect of the Green Belt, the whilst it is acknowledged that the Green Belt should generally be protected, PPS10 emphasises that local authorities should 'recognise the particular locational needs of some types of waste management facilities when defining detailed green belt boundaries and, in determining planning applications'. In line with PPS10 companion guidance, should any sites within the Green Belt be specifically allocated within the WCS, it will need to be clearly indicated that they are for waste management purposes only. The Publication WCS identifies part of Area C as a strategic site allocation under Core Policy WCS4. This site has been taken forward because it forms part of an existing waste management facility with support from the landowner/waste operator, which greatly increases the prospect of delivery. The site is also close to Cheltenham one of the county's two main urban areas. Furthermore the site is not at risk from flooding and there are relatively few sensitive uses located nearby. The importance of traffic issues in this area is recognised and any development would need to be supported by a Transport Assessment (TA) as appropriate. Area A is closest to a number of sensitive receptors and Following discussions with the waste operator it is evident that Area B is likely to be needed for other waste uses associated with the existing landfill operation and subsequent site restoration. For these reasons and having regard to the level of additional waste recovery capacity needed over the plan period, Areas A and B will not be taken forward into the Publication WCS. It should be noted that by not taking either Area forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having

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regard to the relevant general policies of the WCS, national policy and any other material considerations. 2. Areas A, B, C Wingmoor West - The initial assessment of biodiversity has revealed an uncertain impact. Should a planning application come forward on any of these three sites it would need to be accompanied by a more detailed assessment with any mitigation identified as necessary. In terms of the Green Belt please refer to comments on Wingmoor Farm East above. PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. In relation to the three Wingmoor Farm West sites, The Publication WCS identifies Area B as a strategic site allocation under Core Policy WCS4. This site has been taken forward because it forms part of an existing waste management facility with support from the landowner/waste operator, which greatly increases the prospect of delivery. The site is also close to Cheltenham one of the county's two main urban areas. Furthermore the site is not at risk from flooding and there are relatively few sensitive uses located nearby. Area A is unallocated greenfield land within the Green Belt, has some sensitive receptors nearby to the south and there has been no significant interest from the waste industry for strategic waste recovery which raises question marks over the deliverability of a strategic waste management operation on this site. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the inclusion criteria for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Areas A and C will not be taken forward into the Publication WCS. It should be noted that by not taking either Area forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations. 7. Notwithstanding the above, the site has not been taken forward into the Publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over

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the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the Publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations. 8. Nastend Farm - Notwithstanding the above the site has not been taken forward into the Publication WCS because although the County Council is the landowner, following discussions with the County Council's Waste Disposal Authority (WDA) it would appear that there is significant uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore, the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the Publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations. 9. Notwithstanding the above, the site has not been taken forward into the Publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore, the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the Publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. The site's existing Anaerobic Digestion (AD) capacity for waste water and other assorted wastes is recognised and any additional increase in these facilities would be considered through other criteria-based policies in the WCS. 10. The Park - The site has been taken forward into the Publication WCS because it forms part of an existing waste management facility and there is support from the landowner which greatly increases the prospects of delivery, the site is located in close proximity to Cheltenham, one of the County's two main urban areas where most of Gloucestershire's waste arises, the site is not at risk of flooding and has no other significant nearby environmental constraints and there are relatively few sensitive uses located nearby. In relation to Green Belt issues, please see comments on Wingmoor Farm East above.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Disagree

6. Please give a reason for your answer to Question 5.

It is considered the urban areas of Gloucester and Cheltenham should not be extended. Any waste treatment facilities should be located within 'Zone C' which are more sustainable locations proximate to the sources of waste arisings and the strategic road network. If any urban extensions did come forward in the future then a need / sequential assessment could be undertaken to determine whether waste treatment facilities should be incorporated into these areas.

6. Officer Response.

Comment noted. The Government's intention to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I do not support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

Identifying sites outside 'Zone C' to support the main facility is not supported as there should only be a one site solution. In theory it could be considered there is a benefit of locating a waste transfer facility for bulking waste at a location in the east of the county. This would not be a sustainable or economically viable option

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however due to the distance from the main sources of waste arisings. The site at Javelin Park is the most appropriate site as it is proximate to Gloucester and Cheltenham and the strategic road network. There may be existing small scale waste transfer facilities that could support the chosen main site or that could provide opportunities for heat networks for example (i.e. CHP).

8. Officer Response.

Comment noted regarding support for a one site solution at Javelin Park. OIt is essential that the WCS provides a clear strategy setting out what will be built and where. This will provide certainty and confidence to the development industry and help bring proposals forward. The Council's preferred strategy is to focus the location of new strategic waste management facilities on the area defined as Zone C. This approach is considered to be consistent with national policy (PPS10) and the Regional Waste Strategy. Although the preferred focus for strategic waste management is Zone C, a number of other sites were identified outside this zone in the Forest of Dean and Cotswold District in order to provide suitable flexibility and support for the Zone C sites. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester		X	
2. Hurst Farm, Lydney		X	
3. Land at Lydney Industrial Estate, Lydney		X	

10. Please give a reason for your answers to Question 9.

These three sites are not suitable for the treatment of residual household waste. The strategic waste site should be located in 'Zone C'.

10. Officer Response.

Comment noted. Please see response to Q8.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I do not support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

There should be a one site solution located within 'Zone C' rather than a combination of sites. The most suitable site is considered to be Javelin Park. There may be existing small scale waste transfer facilities that could support the chosen main site or that could provide opportunities for heat networks for example (i.e. CHP).

12. Officer Response.

Comment noted. Please see response to Q8.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No

13. Officer Response.

noted

14. Do you have any comments on the Executive Summary?

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No comments

14. Officer Response.

noted

15. Do you have any comments on Section 1?

No comments

15. Officer Response.

noted

16. Do you have any comments on Section 2?

No comments

16. Officer Response.

noted

17. Do you have any comments on Section 3?

No comments

17. Officer Response.

Noted

18. Do you have any comments on Section 4?

No comments

18. Officer Response.

Noted.

19. Do you have any comments on the Sustainability Appraisal reports?

No comments

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

No comments

20. Officer Response.

Noted.

Number 364 Type IND Name Richard Graves Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Although I support the search for strategic waste sites within 'Zone C', providing the sites are centred away from well populated areas, I would prefer to see sites that are in less populated areas outside Zone C.

2. Officer Response.

Support for Zone C noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should `provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, `with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. In terms of siting the facility elsewhere, an initial long-list of 329 sites was drawn up and subsequently reduced on the grounds of site size, location, flood risk, highways and deliverability. Whilst identifying a remote site away from residential areas may seem a good idea such an approach would be contrary to national and regional policy which requires waste to be treated close to source.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch		X	
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre	X		
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park	X		
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

The areas at Wingmor Farm would enlarge what is already a vast development which I consider to be too close to local villages, in particular, Bishops Cleeve. Frequent odour problems occur along with high levels of dust from the waste sites and increasing noise levels generated by heavy traffic transitting to and from the sites. The same reason applies to other waste sites close to populated areas.

4. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants.

Number 364 Type IND Name Richard Graves Organisation not applicable/not provided

However, it is important that waste is managed close to source. See previous comments. The re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community. Odour, noise and dust are matters that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any sensitive receptors. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning conditions. With regard to pollution it should be noted that planning and pollution control regimes are separate but complimentary. Pollution control is concerned with preventing pollution whilst planning controls the development and use of land. Waste planning authorities are expected to work on the assumption that the relevant pollution control regime will be properly applied and enforced.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Disagree

6. Please give a reason for your answer to Question 5.

Although the existing waste treatment capacity is likely to prove inadequate, for environmental reasons, I would prefer to see any new treatment works outside of the new development areas.

6. Officer Response.

Comment noted. See previous comments with regard to waste facilities in urban areas. The site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the Government's intention to abolish RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

As above in Q6.

8. Officer Response.

See previous response.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney	X		
3. Land at Lydney Industrial Estate, Lydney	X		

10. Please give a reason for your answers to Question 9.

The sites appear to be located in less well poulated areas thus minimising the nuisance factors such as noise, odours, dust etc and it is likely that sites will have less impact on the environment.

10. Officer Response.

Number 364 Type IND Name Richard Graves Organisation not applicable/not provided

Comments noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. These sites will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the sites forward as allocations at this stage does not mean that the sites are unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

In order to minimise the environmental impact, locations for sites should be considered away from the most populated areas.

12. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. See previous responses on this. The Council's preferred strategy is to focus the location of new strategic waste management facilities on the area defined as Zone C. This approach is considered to be consistent with national policy (PPS10) and the Regional Waste Strategy. Although the preferred focus for strategic waste management is Zone C, a number of other sites were identified outside this zone in the Forest of Dean and Cotswold District in order to provide suitable flexibility and support for the Zone C sites. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No, but have you considered the use of spent quarries/mines and old industrial areas for depositing residual municipal waste?

13. Officer Response.

Although quarries have historically been associated with waste disposal (namely landfill), this consultation was to discuss sites suitable for residual waste management treatment (not landfill). Quarries do not fall within the inclusion criteria outlined in Technical Evidence paper WCS-N (with the exception of those quarries with existing waste management licenses).

14. Do you have any comments on the Executive Summary?

No

14. Officer Response.

Noted.

15. Do you have any comments on Section 1?

No

15. Officer Response.

Noted.

16. Do you have any comments on Section 2?

No

Number 364 Type IND Name Richard Graves Organisation not applicable/not provided

16. Officer Response.

Noted.

17. Do you have any comments on Section 3?

No

17. Officer Response.

Noted.

18. Do you have any comments on Section 4?

No

18. Officer Response.

Noted.

19. Do you have any comments on the Sustainability Appraisal reports?

No

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

No

20. Officer Response.

Noted.

Number 88 Type IND Name John Green Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I am writing to object to the use of all thirteen of the sites listed for possible waste treatment in Gloucestershire on the grounds that any of these sites could be used for incineration, which I oppose. Until such time as incineration is excluded as an option for these sites, they will remain unacceptable to me. 1. Incineration creates toxic fly ash residue which has to be transported and buried, creating an unacceptable risk to nearby residents. 2. I understand that incineration contracts will be for at least 24 years, locking us into a situation which does not encourage or take into account substantial reduction in the volume of waste or newer more efficient and effective technologies being developed. In fact, it provides an incentive to continue to produce waste for the incinerators in order to recover the investment in them. 3. Incineration has a higher long term cost to the taxpayer. 4. Incinerators do not encourage reduction, reuse or recycling. 5. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that satisfies the criteria you are obliged to use better than does incineration. It is better for the environment and the taxpayer in the long run. 6. Large incinerators in other areas of the country are already being found to be a mistake. I would like to see initiatives which will actively encourage reduction, reuse and recycling such as changes to packaging and increased facilities for recycling. Most of the waste I produce and send to landfill is PLASTIC or based on plastic and is often unnecessarily robust for something that is 'expected' to be discarded. Examples are the plastic bags or other forms of packaging around fruit and vegetables, rather than encouraging us to bring reusable containers; free provision of plastic bags in supermarkets (although this is reducing); containers that are obviously larger than required, simply to provide a bigger 'advertisement' to buyers, and so on. With such an amazingly durable material such as plastic, we should never need to throw it away - it could simply be reused over and over again. The only apparent problem is that we are used to seeing shiny new packaging and would not choose to see a scuffy older variety if we had a choice - but why should we have a choice?

17. Officer Response.

Comments noted. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 302 Type LAC Name Julie Greening Organisation Newtown Area Community

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
3. Easter Park, Ashchurch		X	

4. Please give a reason for your answers to Question 3.

I write on behalf of Newtown Area Community and Residents' Association who strongly urge you to reconsider the suitability of the Easter Park location at Ashchurch in Tewkesbury as a possible recycling site. We are particularly concerned that during previous industrial use the site experienced leaks which caused contamination of local water sources and still has a natural water course running through the grounds which could exacerbate further pollution. The surrounding area has now also been developed substantially for residential use so any contamination risk would impact on a massive number of households as well as businesses and schools. The other factor that concerns us as local residents is the increase in the number of lorries that will be using an already extremely busy road which during certain times of the working day is at a standstill. We trust you will give our concerns serious consideration and reach the conclusion that this location is not suitable for a recycling/incinerator site.

4. Officer Response.

Comments noted. The Council is aware of the culvert running through the site. With regards to potential pollution, PPS10, states that modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health. Furthermore, the detailed consideration of a waste process and the implications, if any, for human health is the responsibility of the pollution control authorities. Pollution control is concerned with preventing pollution whilst planning controls the development and use of land. Waste planning authorities are expected to work on the assumption that the relevant pollution control regime will be properly applied and enforced. Notwithstanding the above, the site has not been taken forward into the publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 5 Type IND Name R J Gregory Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
3. Easter Park, Ashchurch		X	

4. Please give a reason for your answers to Question 3.

With regard to the possibility of a waste treatment site at Easter Park myself and many of my neighbours are very concerned about this. The road itself is very busy and any increase in traffic will lead to congestion which will probably stretch back to the entry and exit roads on the nearby motorway. That stretch of road was liable to severe flooding a couple of years ago and with the increase of traffic this problem could well arise again. As the proposed site is opposite a petrol station surely the danger of an incinerator nearby can only lead to problems. I can only speak for Easter Park but I would imagine that unless you consider sites far removed from residential areas you will meet opposition at every turn.

4. Officer Response.

Comments noted. Dealing with each point in turn. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. For Easter Park, the assessment highlighted a potential decrease in traffic, compared with that which could be generated under the existing planning permission for employment use. The site enjoys good access to the A46 and the M5. Any strategic site allocation made in the publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. The site has been subjected to Strategic Flood Risk Assessment (SFRA) which demonstrates that the site is not located within the floodplain. Whilst the A46 may have been impassable after flooding in July 2007, that was an extreme event which may not be repeated for several hundreds of years. Any proposal of more than 1 hectare would need to be supported by a site-specific Flood Risk Assessment (FRA). Importantly the principle of built development on this site has already been accepted through the granting of planning permission. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.Clearly the provision of new waste management facilities in urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source and the urban areas of Gloucester and Cheltenham and to a lesser extent Tewkesbury are where most of Gloucestershire's waste is generated. Whilst there is residential development to the north of the site, this is largely buffered by a number of existing employment uses. Notwithstanding the above, the site has not been taken forward into the publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 293 Type PC Name M Gribble Organisation Eastington Parish Council

Number 422 Type IND Name Stephen Gribble Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Reasonably close to road network

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

I am only concerned about the site at Nastend. It is adjacent to an historic hamlet containing many listed buildings. The land has also been identified in the SHLAA as suitable for housing. It is also earmarked for industrial development. All in all, this land seems to be a massive target for development. It would link Stonehouse to Eastington and erode the nature of the parish of Eastington.

4. Officer Response.

Comments noted. With regard to Site 8, Nastend farm, the site has not been taken forward into the publication WCS because although the County Council is the landowner, following discussions with the County Council's Waste Disposal Authority (WDA) it would appear that there is significant uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore, the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

6. Please give a reason for your answer to Question 5.

I have not researched this question

6. Officer Response.

Number 422 Type IND Name Stephen Gribble Organisation not applicable/not provided

Comment noted.

7. Do you support the identification of sites outside Zone C?

I'm not sure/I don't know

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

11. Do you support the approach of using a combination of sites within and outside Zone C?

I'm not sure/I don't know

14. Do you have any comments on the Executive Summary?

I think much more emphasis should be given to reducing waste, and recycling. Incineration or other disposal methods should be made so very expensive that alternatives to producing waste are more attractive. I guess this is what has happened with landfill - it is now expensive so we are looking at burning the rubbish instead.

14. Officer Response.

Comments noted. The Council is already doing a great deal to promote waste reduction, re-use and recycling. The Publication WCS will set out policies accordingly. However there will always be an element of leftover 'residual' waste that cannot be re-used or recycled. This must be treated in order to divert it from landfill. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.

15. Do you have any comments on Section 1?

I understand other European countries are moving away from incineration. Why would Gloucestershire be embracing it? How can we be so certain that the minute particles in the air are are not detrimental to health?

15. Officer Response.

At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. Notwithstanding the above, incineration is an established

Number 422 Type IND Name Stephen Gribble Organisation not applicable/not provided

technology that is well used in continental Europe. In 2007 Germany incinerated 35% of its waste, Belgium 34%, the Netherlands 38% and Sweden 47% (source: Eurostat 2007)

16. Do you have any comments on Section 2?

Would we end up taking waste in from outside Gloucestershire in order to make the facilities return benefits. Are they to be run on commercial lines - if yes, then the temptation would be to take waste from outside the immediate area to make money. This would incur costs in terms of pollution, and increase the carbon footprint in the miles the waste would travel.

16. Officer Response.

Comment noted. The council endeavours to deliver a solution to manage Gloucestershire's residual waste, not waste from outside the county. To promote flexibility of the solution and further recycling above the minimum 60% target, the council would be open to views on the treatment of Gloucestershire's commercial waste. It is important to note that household waste is only 25% of the total waste produced by Gloucestershire. Waste management and the move away from landfill are driven by the Climate Change agenda. Climate change is a wider issue to which the development of this solution can positively contribute.

17. Do you have any comments on Section 3?

I have only really focused on the site that would affect me directly.

17. Officer Response.

Noted

18. Do you have any comments on Section 4?

no

18. Officer Response.

Noted.

19. Do you have any comments on the Sustainability Appraisal reports?

no

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

no

20. Officer Response.

Noted.

Number 93 Type IND Name Michael Griffiths Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Waste should be treated on the area where it is generated. Waste should not be transported more than 16KM. To reduce traffic and the carbon footprint. We must have legislation to minimise the amount of waste that is generated by reducing packaging and reusing containers and recycling at source of use.

2. Officer Response.

Comment noted. The Council is already doing a great deal to promote more waste reduction, re-use and recycling. The Council's target of at least 60% recycling/composting by 2020 is 10% higher than the national target over the same period. There will however always be an element of leftover 'residual' waste that needs to be managed.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

If recycling & composting are processed efficiently, the residual waste can only be landfilled as there will be no combustible waste remaining (No incineration). These sites are in the green belt. These sites can be seen from the AONB. Further development at these sites will increase traffic movements. These sites are not operating efficiently at present. Many problems with landfill gas odours, composting odours, windblown litter, noise, scavenging birds, uncovered waste deposits. No further expansion of this vast and complex site of waste treatment and landfill. It is too close to existing and proposed housing.

4. Officer Response.

Comments noted. There are potentially combustible elements of the residual waste stream which cannot be recycled or safely composted such as sanitary products, disposable nappies and wood-based cat litter. Due to the biodegradable content of such items, they are not suitable for landfilling and some pre-treatment would be required using one of the technologies identified within the consultation. Whilst it is acknowledged that the Green Belt should generally be protected, PPS10, emphasises that local authorities should recognise the particular locational needs of some types of waste management facilities when defining detailed green belt boundaries and, in determining planning applications. In line with PPS10 companion guidance, should any sites within the Green Belt be specifically allocated within the WCS, it will need to be clearly indicated that they are for waste management purposes only. Although the sites may be visible from the AONB, importantly, they are not located within the AONB. There would therefore be no direct impact. In terms of traffic movements, the initial highway assessment carried out in support of these sites acknowledges a likely net increase in traffic. It suggests that improvements may be needed at certain locations (e.g. junction improvements) in order to increase capacity. Any strategic site allocation made in the publication WCS will be supported by a further highway assessment with any necessary mitigation (e.g. junction improvements) clearly identified as site-specific requirements. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. Current operational issues are not within the scope of the WCS. If there are any existing site conditions not being properly met this is a matter for planning enforcement or waste licensing. Odour, noise and dust are matters that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any sensitive receptors. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning

Number 93 Type IND Name Michael Griffiths Organisation not applicable/not provided

conditions. Importantly the site options consultation seeks to identify sites suitable for waste treatment not disposal. This will mean factors such as landfill gas, odour, litter, scavenging birds etc. will not be an issue with modern waste management facilities, as the waste is delivered into an enclosed environment.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

6. Please give a reason for your answer to Question 5.

Composting and recycling should be treated in the location where it is produced. Remaining waste to be landfilled.

6. Officer Response.

Support noted. The integration of waste management facilities into the urban extensions would allow waste from these developments and the wider Gloucester and Cheltenham area to be treated close to source in line with national and regional policy. However, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

To treat waste in areas produced. To reduce transportation.

8. Officer Response.

Comment noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney	X		
3. Land at Lydney Industrial Estate, Lydney	X		

10. Please give a reason for your answers to Question 9.

Outside of Zone C (the M5 corridor).

10. Officer Response.

Support noted.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I do not support the approach of using a combination of sites from within and outside Zone C

Number 93 Type IND Name Michael Griffiths Organisation not applicable/not provided

12. Please give a reason for your answer to Question 11.

Should be as small a treatment site and in the area of waste production.

12. Officer Response.

Comment noted. Whilst the Council's preferred strategy is to provide strategic waste management facilities within Zone C, there is likely to be a role for sites outside this area e.g. smaller scale provision or supporting infrastructure e.g. waste transfer. On balance having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the publication Waste Core Strategy (WCS). It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the Waste Core Strategy (WCS) national policy and any other material considerations.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

Old airfields in the county. Forestry commission land in the Forest of Dean. Old quarries - coal mines (Brownfield Sites).

13. Officer Response.

Defence Estates were contacted in relation to land at Ashchurch, but indicated that they did not have any other land in Gloucestershire that was suitable for residual waste treatment. The following sites may have at some time been an airfield and/ or under MOD ownership: Babdown Airfield (Site 012); Weston Industrial Estate/Honeybourne Airfield (Site 027); RAF Quedgeley (122/543) Javelin Park/Former Moreton Valence Airfield (Site 145); Old Moreton Valence Airfield (155/159/546); Former MOD Site 4, Hardwicke (203); Former MOD Site 2, Hardwicke (204/555); Former MOD Site 6, Hardwicke (205); The Park at Wingmoor Farm West (272); Ashville Business Park (296/560); Gloucester/Brockworth Business Park (243/297/559); Innsworth Technology Park (298/558); Waterwells Business Park (377/538); Green Farm Business Park (378/379/538); Olympus Park (380/381/537); Staverton Technology Park (423/562); Additional Land at Staverton Technology Park (424); Aston Down (433); Kemble Airfield (438); Upper Rissington Business Park (454); Anson Business Park (460) Please refer to Technical Evidence Paper WCS N and its appendices for information on the above sites. Many of the above sites had technical assessments carried out on them and of those, the following parcels of land associated with old MOD land formed part of the consultation process: Javelin Park (Moreton Valence Airfield) The Park (Wingmoor West) Land adjacent to Quadrant Business Centre (Former MOD Site 2) Smiths (Old Moreton Valence Airfield). Although quarries and mines have historically been associated with waste disposal (namely landfill), this consultation was to discuss sites suitable for residual waste management treatment (not landfill). Quarries and mines do not fall within the inclusion criteria outlined in Technical Evidence paper WCS N (with the exception of those quarries with existing waste management licenses).

14. Do you have any comments on the Executive Summary?

As you are aware I am not happy with the process of consultation. Only 0.6% of the population of Gloucestershire were consulted by letter. Other members of the public were expected to be contacted by local newspapers or radio.

14. Officer Response.

Comments noted. The site options consultation was extensive, via newspapers, radio, advertising, direct mail, email, roadshows and online. Consultation was undertaken in line with the Council's adopted Statement of Community Involvement (SCI).

17. Do you have any comments on Section 3?

Sites have been selected on the basis of proposed developers and processors. Not on distribution throughout the County.

17. Officer Response.

Comment noted. The sites have been selected based on a number of factors including size, location, availability, flood risk, highways, deliverability and so on. They

Number 93 Type IND Name Michael Griffiths Organisation not applicable/not provided

have not been selected having regard to potential operators or technology. In terms of distribution throughout the County, the site options consultation paper identified 13 sites including 10 within Zone C and 3 outside. This included sites in all Districts/Boroughs other than Cheltenham, where no suitable sites were available. Views were invited on whether a combination of sites should be used. At the present time no decision has been made on whether residual municipal waste will be managed at one large facility or at several smaller sites. The council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the county. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. The advantages and disadvantages would be investigated further during the procurement process.

18. Do you have any comments on Section 4?

No incineration in Gloucestershire. Make it environmentally friendly to everyone. (C.H.P??)

18. Officer Response.

Comment noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. Importantly, the type of technology chosen has no direct bearing on the delivery and implementation element of the WCS (the principles of which will apply regardless of which technology or technologies come forward).

Number 162 Type IND Name G Griffiths Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I'm not sure/I don't know

2. Please give a reason for your answer to Question 1.

Most answers have been marked 'don't know'. This is because I don't see how I can make any meaningful comments without knowing what sort of waste treatment you are talking about. You have pictures of incinerators but the word is never mentioned, although most people I talk to are convinced that is what is proposed. To my mind what is needed is a reasoned explanation of the types of waste treatment being considered and the pros and cons of each. We then might be able to make sensible comments.

2. Officer Response.

Comment noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

Most answers have been marked 'don't know'. This is because I don't see how I can make any meaningful comments without knowing what sort of waste treatment you are talking about. You have pictures of incinerators but the word is never mentioned, although most people I talk to are convinced that is what is proposed. To my mind what is needed is a reasoned explanation of the types of waste treatment being considered and the pros and cons of each. We then might be able to make sensible comments.

4. Officer Response.

Comment noted. See previous response.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Number 162 Type IND Name G Griffiths Organisation not applicable/not provided

Neither Agree nor Disagree

6. Please give a reason for your answer to Question 5.

Most answers have been marked 'don't know'. This is because I don't see how I can make any meaningful comments without knowing what sort of waste treatment you are talking about. You have pictures of incinerators but the word is never mentioned, although most people I talk to are convinced that is what is proposed. To my mind what is needed is a reasoned explanation of the types of waste treatment being considered and the pros and cons of each. We then might be able to make sensible comments.

6. Officer Response.

Comment noted. See previous response.

7. Do you support the identification of sites outside Zone C?

I'm not sure/I don't know

8. Please give a reason for your answer to Question 7.

Most answers have been marked don't know. This is because I don't see how I can make any meaningful comments without knowing what sort of waste treatment you are talking about. You have pictures of incinerators but the word is never mentioned, although most people I talk to are convinced that is what is proposed. To my mind what is needed is a reasoned explanation of the types of waste treatment being considered and the pros and cons of each. We then might be able to make sensible comments.

8. Officer Response.

Comment noted. See previous response.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

Most answers have been marked "don't know". This is because I don't see how I can make any meaningful comments without knowing what sort of waste treatment you are talking about. You have pictures of incinerators but the word is never mentioned, although most people I talk to are convinced that is what is proposed. To my mind what is needed is a reasoned explanation of the types of waste treatment being considered and the pros and cons of each. We then might be able to make sensible comments.

10. Officer Response.

Comment noted. See previous response.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I'm not sure/I don't know

12. Please give a reason for your answer to Question 11.

Most answers have been marked 'don't know'. This is because I don't see how I can make any meaningful comments without knowing what sort of waste treatment you are talking about. You have pictures of incinerators but the word is never mentioned, although most people I talk to are convinced that is what is proposed. To my mind what is needed is a reasoned explanation of the types of waste treatment being considered and the pros and cons of each. We then might be able to make

Number 162 Type IND Name G Griffiths Organisation not applicable/not provided

sensible comments.

12. Officer Response.

Comment noted. See previous response.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No

13. Officer Response.

noted

17. Do you have any comments on Section 3?

Most answers have been marked 'don't know'. This is because I don't see how I can make any meaningful comments without knowing what sort of waste treatment you are talking about. You have pictures of incinerators but the word is never mentioned, although most people I talk to are convinced that is what is proposed. To my mind what is needed is a reasoned explanation of the types of waste treatment being considered and the pros and cons of each. We then might be able to make sensible comments.

17. Officer Response.

Comment noted. See previous response.

Number 313 Type IND Name Michael Griffiths Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Waste should be treated within 16km of its source. To reduce transportation and the carbon footprint.

2. Officer Response.

Comment noted. The proposed spatial strategy focusing on Zone C will allow most of Gloucestershire's waste (which is generated at Gloucester and Cheltenham) to be managed close to source in line with national and regional policy.

Number 65 Type IND Name Anne Griffths Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

I WISH TO MAKE THE FOLLOWING COMMENTS ON THE DOCUMENTS I HAVE READ CONCERNING THE WASTE CORE STRATEGY CONSULTATION WITH PARTICULAR REFERENCE TO THE SITES KNOWN AS WINGMOOR FARM EAST AND WEST The consultation on the Waste Core Strategy states: - LETS END LANDFILL. Landfill sites are releasing harmful greenhouse gases, including methane and carbon dioxide. Landfill sites will have to be managed for many years because of these gases. Therefore all the sites on Wingmoor Farm are not suitable sites for installing new technologies. The fact that toxic hazardous waste, known as incinerator ash, has been buried over many years on the site can remain dangerous for millennia and will have to be continuously monitored. What ever type of technologies are chosen by the County Council, these will no longer be dependent on being located on landfill sites, and therefore should not be sited at Wingmoor Farm. Wingmoor Farm is a GREEN BELT site, therefore if the need for landfill is reducing, then 'SPECIAL CIRCUMSTANCE' will no longer apply to other forms of waste treatment proposed there. If there is a need for emerging new sites then they should be located close to the communities where the waste is produced. If the Counties strategy is to RE-USE AND RECYCLE and therefore REDUCE the waste going to landfill then it would be wrong to concentrate so many technologies on one huge area at Wingmoor Farm, to the north of Cheltenham. In fact they need not be sited at Wingmoor Farm at all. Special attention should be given to the possibility of a major incident at these sites, which could result in their closure (Remember the County's experiences of the flooding of 2007) therefore there would not be alternative facilities nearby to carry out the processing. (Especially as a lot of these technologies, under consideration by the County, operate on a 24-hour system, needing to be continuously fed) Particular attention should be paid to the fact that there is only one access to these sites along the A 4019, and to Wingmoor Farm West, using an ancient road bridge over the railway line. The access is therefore totally dependent on the use of this bridge. No plans have been made as to how the sites would be accessed should the road bridge be de-commissioned. A major TRAFFIC RISK ASSESSMENT should be made to establish the current impact of the combined activities of all the sites along the A435, A4019 and the A40 in and around Cheltenham, along with the impact of the proposed new sites. WP08 Environmental Acceptability 'significant adverse impact' There is an existing significant adverse impact on residents living around the proximity of the sites, from stress, noise, odours, flies, vermin, seagulls and litter. These adverse impacts can only magnify if the sites are allowed to develop further with whatever technologies the County Council decides to use to process its waste. DRAFT DOCUMENT Statement of Risk - No relevant corporate risk. I would challenge this statement, as we are still awaiting the publication of the HEALTH IMPACT ASSESSMENT. This is the first attempt at assessing the impact on the physical and mental health of communities living around the landfill sites, namely the community of Bishops Cleeve. This assessment, as yet, has not been extended to other communities living within 3 km of the WF sites, which will include CHELTENHAM. There must be a corporate risk if there is an incident with escaping of incinerator ash, which is air-borne, or if one of the vehicles carrying the hazard waste was involved in a major road accident on one of the counties roads. FROM SEEKING YOUR VIEW (GCC) If the Government adopts the RSS then development proposals may be brought forward by developers. Therefore in addition to receiving your views on the ten specific sites identified we would welcome your views on whether we should be looking to incorporate residual municipal waste treatment into the potential urban extensions, if and when they are brought forward. It is vital that all new developments should incorporate appropriate technologies to process the waste SAFELY where it is produced. This should also incorporate community compost facilities and re-cycling stations. Therefore reducing the carbon footprint for transportation and preventing the concentration of waste technologies in any one location. However, the cumulative effects of living within close proximity to the Wingmoor Farm operations will have a major effect on the 5000 people who will live in the new community to the south side, known as the Proposed North West Extension to Cheltenham. This new town will run along the sides of both Wingmoor Farm East, and West. I cannot comment on the 10 new specific sites in Zone C, as I do not know what is proposed for them, I can only

Number 65 Type IND Name Anne Griffths Organisation not applicable/not provided

comment on the effects my family have experienced in living next to the Wingmoor Farm land fill sites for the past 30 years.

4. Officer Response.

Comments noted. Dealing with each in turn. The need to move away from landfill is fully acknowledged. The site options consultation focuses on finding a site or sites suitable for the provision of a waste treatment facility. The provision of such a facility will help divert waste from landfill. The sites proposed at Wingmoor Farm in the consultation paper do not form part of the landfill sites. In this regard, there is no reason why a facility may not be developed on these sites. Whilst it is acknowledged that the Green Belt should generally be protected, PPS10, emphasises that local authorities should 'recognise the particular locational needs of some types of waste management facilities when defining detailed green belt boundaries and, in determining planning applications'. In line with PPS10 companion guidance, should any sites within the Green Belt be specifically allocated within the WCS, it will need to be clearly indicated that they are for waste management purposes only. Para 7.34 states 'In their search for sites, and in line with the Key Planning Objectives in PPS10, the WPA are expected to protect Green Belts but recognise the particular locational needs of some types of waste management facilities when defining detailed Green Belt boundaries. In certain circumstances, in particular where a local authority's area contains a high proportion of Green Belt land and an inadequate range of suitable sites outside the Green Belt exist, an authority may, exceptionally, wish to consider a limited alteration to the defined Green Belt boundary, to meet a specific, identified need for a waste management facility. The alteration might be to accommodate a site inset with the Green Belt." PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. For the Wingmoor sites the assessment flagged up some capacity issues which may need to be addressed e.g. through junction improvements. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. In terms of proximity to housing (existing and proposed).Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. Although some of the technologies operate on a 24-hour system, this does not necessarily mean that they will be accepting deliveries 24/7. Most facilities would include a storage bay to accommodate enough feedstock to enable the facility to operate efficiently during periods when waste is not being delivered (evenings, weekends & bank holidays). The north west Cheltenham urban extension is currently a draft proposal only and indeed with the potential abolition of the RSS may not come forward at all. In terms of health impact, PPS10, states that 'modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health'. PPS10 also states that, where concerns about health are raised, waste planning authorities should avoid carrying out their own detailed assessments rather they should ensure, through drawing from Government advice and research and consultation with the relevant health authorities and agencies, that they have any advice on implications for health..' The WPA duly sought the advice from the PCT/NHS through the site options consultation. Support for waste provision within the urban extensions noted. The integration of waste management facilities into the urban extensions would allow waste from these developments and the wider Gloucester and Cheltenham area to be treated close to source in line with national and regional policy. However, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason,

Number 65 Type IND Name Anne Griffths Organisation not applicable/not provided

although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

I do have a suggestion for a possible new site to be considered that is the decommissioned BERKLEY NUCLEAR POWER STATION, which has all the necessary infrastructure in place, and could accommodate hazardous waste.

13. Officer Response.

Berkley Power Station was initially investigated (ref Site 434) but this was found to fall outside of the 16km boundary from the fringe of the urban areas of Cheltenham and Gloucester and therefore no further assessment was carried out on the site. Please refer to Technical Evidence Paper WCS-N (Section 4 and Appendix A). Furthermore the consultation does not relate to the provision of waste facilities for hazardous waste. It focuses on municipal (mainly household) waste which is not generally hazardous.

Number 419 Type IND Name Peter Grinnell Organisation not applicable/not provided

17. Do you have any comments on Section 3?

With reference to your outline plans to add more recycling facilities to the site at Stoke Orchard, I would like my objection noted. I am a member of the Cheltenham & District Clay club and it is the only leisure activity I am able to enjoy. If the club loses its ground it will have a big impact on me and all the members who have worked hard to get the club run properly. The club has good officers with safety being of great importance; it is one of the few grounds where it is open on a regular basis, regardless of the weather. I have noticed when driving to the club that the surrounding roads are not really suitable for lots of heavy vehicles and I travel by a school which is presumably used Monday to Friday by small children, surely this would put them at an increased risk if you go ahead with any such plans. I feel certain that Gloucestershire has more appropriate sites and hope that you will consider some of those rather than Stoke.

17. Officer Response.

Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishops Cleeve Strategic Site and as such fulfilled the inclusion criteria for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that this site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 125 Type IND Name Kate Haigh Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

I prefer more distributed sites, minimising transport across the county

2. Officer Response.

Comment noted. Zone C includes Gloucester and Cheltenham which is where most of Gloucestershire's waste is generated. This will ensure that this waste is able to be treated close to source thereby minimising transport requirements. In terms of a network of small, local facilities the site options consultation paper identifies 13 potential sites, 10 within Zone C, 3 outside Zone C. Views are invited on using a combination of different sites. The consultation makes it clear that whilst some of the sites are capable of providing a one-site solution, it may be that strategic waste management of municipal waste comes forward on several different sites. The council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the county. The publication WCS identifies 4 strategic sites within Zone C. Proposals may come forward on other sites subject to relevant criteria.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X		
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre	X		
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park	X		
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West			

4. Please give a reason for your answers to Question 3.

The railway traingle site is too close to residential areas, the traffic would create more danger as the road access is unsuitable. It would blight the redevelopment of the railway triangle for residetial development.

4. Officer Response.

Comments noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. In terms of Site 7, Land North of Railway Triangle, notwithstanding the above, the site has not been taken forward into the

Number 125 Type IND Name Kate Haigh Organisation not applicable/not provided

publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the Publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Disagree

6. Please give a reason for your answer to Question 5.

small heat & power plants may be acceptable.

6. Officer Response.

Comment noted. The urban extensions do present the opportunity to use locally generated heat and power recovered through waste treatment. However, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a waste treatment facility or facilities as part of those proposals. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

I furrow a dispersed approach and sharing facilities with close neighbours, and a low carbon solution

8. Officer Response.

Support for dispersed approach noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 125 Type IND Name Kate Haigh Organisation not applicable/not provided

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney	X		
3. Land at Lydney Industrial Estate, Lydney	X		

10. Please give a reason for your answers to Question 9.

see Q8

10. Officer Response.

See previous response.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

see Q8

12. Officer Response.

See previous response.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

the Tetbury area, Chipping Camden

13. Officer Response.

Over 300 individual parcels of land in the county were originally identified as fulfilling the 'inclusion criteria' discussed in Technical Evidence paper WCS-N. These included Tetbury industrial Estate Extension (Site 040), Tetbury Industrial Estate (Site 041), Hampton Street Industrial Estate, Tetbury (Site 314), Priory Street Industrial Estate, Tetbury (Site 317), Campden Business Park, Chipping Campden (Site 448) and Campden and Chorleywood Food Research Association, Chipping Campden (Site 449) as well as other sites in nearby villages such as Blockley, Mickleton and Weston Subedge. However, these sites were found to be less than 2ha and/or fell outside of the 16km boundary from the fringe of the urban areas of Cheltenham and Gloucester and therefore no further assessment was carried out on these sites.

14. Do you have any comments on the Executive Summary?

Q5 of this questionnaire does not need to mention the Councils approach to the RSS it is not relevant

14. Officer Response.

Comment noted.

Number 182 Type IND Name Stuart Haines Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Why should the whole county's waste problems be solely dumped along the M5 corridor.Does the east of the county not produce waste?Surely,some facility should be close to the source of their production.

2. Officer Response.

Comment noted. The rationale underpinning Zone C is that it includes Gloucester and Cheltenham which is where most of Gloucestershire's waste is generated. Treating this waste close to source is consistent with national and regional policy. 329 sites across the County were identified on an initial 'long-list' of sites and reduced on the basis of various factors including site size, location, flood risk, highways and deliverability. Following this, the site options consultation paper identified 3 sites outside Zone C to provide flexibility and support. It should be noted that much of the County is remote from Gloucester and Cheltenham and the designation of waste sites here would be contrary to national and regional policy. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works		X	
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

3,4 & 6 are just off the M5 with little residential nearby. 7 has a large amount of housing nearby, traffic is already a problem and the amount of HGV's would make this considerably worse.

4. Officer Response.

Support for sites (Easter Park, Javelin Park and Moreton Valence) noted. With regard to Site 7, Land North of Railway Triangle, clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more

Number 182 Type IND Name Stuart Haines Organisation not applicable/not provided

responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Notwithstanding the above, the site has not been taken forward into the publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

see Q2

8. Officer Response.

See previous response to Question 2.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

see Q2

12. Officer Response.

Number 182 Type IND Name Stuart Haines Organisation not applicable/not provided

See previous response to Question 2.

17. Do you have any comments on Section 3?

Referring to the land North of railway triangle:The rest of the land at the railway triangle has been earmarked for regeneration, including more housing, and an extension to Armscroft Park.How would that sit, if this site was developed into a large waste treatment developement.Lastly this derelict land is the gateway into the city centre for rail travellers,Gloucester needs improving, it will look terrible if a waste management site (of any description) is the first thing visitors see. I think it will give a harmful impression, put off both further visitors/investment.

17. Officer Response.

Comment noted. See previous response to Question 4.

Number 378 Type BUS Name John Hale Organisation Wellington Park Properties

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
2. Areas A, B & C at Wingmoor Farm West		X	

4. Please give a reason for your answers to Question 3.

I am writing in my capacity as owner and managing director of Wellington Park Properties Ltd, who are the owners of The Park, Wingmoor Farm West, which is featured as site number 10 in your consutation document. My comments however, do not apply to The Park and are based on the presumption that the current use of The Park will continue. I would like to record my objection to the proposed inclusion of "Area A" Wingmoor Farm West, part of site number 2 in your consultation document. Area A is a green field area situated in the green belt and its development for waste processing purposes would entail unnecessary new encroachment into the green belt, contrary to planning policy. A previous planning application for waste processing on the area was turned down, I believe, principally on that basis. There is currently no suitable hard access to the site. We would object to any proposed new access being formed which would further increase traffic on the road leading off the Stoke Orchard/ Bishops Cleeve road, which currently serves as access both to the landfill and The Park. The various businesses currently using buildings on The Park, employ a significant number of workers, many on-site full time but also many others using the site as a base depot. Area A is directly to the South-West of The Park, in very close proximity and, as such, the prevailing wind would, almost continually be carrying any odours, dusts or other emissions from operations on Area A to the obvious detriment of the working conditions at The Park. Any excessive noise generated on Area A would also effect The Park. In conclusion therefore, I strongly suggest that that Area A should be withdrawn from the list of potential sites.

4. Officer Response.

Comments noted. It has been decided that on balance, Area A (Wingmoor Farm West) will not be taken forward into the Publication WCS. This area is unallocated greenfield land within the Green Belt, and has some sensitive receptors to the south. There has been no significant interest from the waste industry for strategic waste recovery raising question marks over the deliverability of a strategic waste management operation on this site. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 333 Type IND Name - Haliday Organisation Village Farm

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

1. Motorway access 2. Includes major waste generation areas.

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
3. Easter Park, Ashchurch		X	

4. Please give a reason for your answers to Question 3.

B4077 would be a major access road for the area east of the site and it runs through our village. It is becoming increasingly busy and is over-used by heavy vehicles.

4. Officer Response.

Comment noted. PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Notably for the Easter Park site, the assessment indicated a potential decrease in traffic compared to that which could be generated if the existing planning permission for employment use were to be implemented. The site also enjoys good access to the Strategic Road Network (SRN). Notwithstanding the above, the site has not been taken forward into the Publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Agree

6. Please give a reason for your answer to Question 5.

It seems obvious. Waste should be dealt with as close to source as possible.

6. Officer Response.

Support noted. The integration of waste management facilities into the urban extensions would allow waste from these developments and the wider Gloucester and Cheltenham area to be treated close to source in line with national and regional policy. However, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the intention of Government to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

Number 333 Type IND Name - Haliday Organisation Village Farm

I do not support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

This site covers the main conurbations. Waste should be disposed of as close to the generators of waste.

8. Officer Response.

Comment noted.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester		X	
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

aonb

10. Officer Response.

Comment noted. Although Foss Cross is located within the AONB, the site accommodates an existing waste facility (household recycling centre). Furthermore, the site was included on the basis of it having the potential for a smaller scale facility as part of a network of sites. There was never any proposal for this site to be used for a large-scale facility, thereby minimising any impact. Notwithstanding the above, having regard to forecast capacity requirements (i.e. the number of sites needed) and the need to manage waste close to source in line with national policy, it has been decided not to allocate any strategic sites outside the area referred to as Zone C (the central area of Gloucestershire). As this site is outside Zone C it is not being taken forward. Also, the lack of waste industry interest in response to this site through the site options consultation (2009) raises question marks over the deliverability of the site for waste management purposes. Furthermore, the Environment Agency (EA) has raised concerns in response to this site in relation to groundwater issues. Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I'm not sure/I don't know

Number 84 Type PC Name Gervase Hamilton Organisation Woodchester Parish Council

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Consistent with government policy (PPS10), the Regional Waste strategy 'From Rubbish to Resource' and the draft S.W Regional Spatial Strategy (W2). Whatever the outcome of further development and housing growth in the Gloucester/Cheltenham area, there will always be a need to dispose of residual domestic waste, after all other biological approaches to waste disposal have been effectively used. Logically such sites should avoid the flood plain and preferably be located away from residential areas.

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X	X	
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			

4. Please give a reason for your answers to Question 3.

Most of these sites are already used for waste disposal. The sites at Ashchurch and the Railway Triangle are close to housing (within 250 metres) and at Gloucester there are potential problems with traffic / accessibility in a residential area. Nastend Farm is zoned but use of existing Greenfield sites should be regarding as a last resort when other brownfield sites are still available. From the options point of view an ideal site is the one at Javelin Park, (11 hectares) close to the motorway and not near residential land. (An argument can be made for concert ration of waste disposal on 2 or 3 sites to avoid excessive traffic movement as opposed to scattered sites).

4. Officer Response.

Support for sites (Wingmoor Farm East & West, Javelin Park, Moreton Valence, The Park) noted. The use of existing waste management facilities is consistent with national policy however, regard must be had to the cumulative effect of previous waste disposal facilities on the care and well being of the local community including any significant adverse impacts on environmental quality, social cohesion and inclusion or economic potential'. (PPS10). In terms of proximity to housing, clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities.

Number 84 Type PC Name Gervase Hamilton Organisation Woodchester Parish Council

With regard to Site 3, Easter park, the site has not been taken forward into the publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). In terms of traffic/accessibility issues and Site 7, the site has not been taken forward into the publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). With regard to Site 8, Nastend farm, the Waste Planning Authority has carefully considered all the issues on this site. Since the site options consultation was undertaken in October 2009 and following discussions with the County Council as Waste Disposal Authority, there is significant uncertainty over the prospect of delivering a strategic waste management facility on this site. For this reason, it has been decided that this site will not be taken forward into the publication WCS. It should be noted that by not taking any site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS national policy and any other material considerations. The site options consultation identifies 13 sites, 10 within Zone C and 3 outside. The questionnaire invited views on the relative merits of these sites as well as the relative merits of using a combination of different sites. At this stage it is not known whether residual municipal waste in Gloucestershire will be managed at one site or several sites. The council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement process all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the county. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered by the waste industry.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Disagree

6. Please give a reason for your answer to Question 5.

The density of housing (and consequent increase in traffic) in the proposed urban extensions would make siting close to these areas environmentally unsuitable and raise potential health and safety issues.

6. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to

Number 84 Type PC Name Gervase Hamilton Organisation Woodchester Parish Council

develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. Notwithstanding this, it is significant to note that the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

Such sites should only be used when all other options have been exhausted. Better to concentrate waste disposal facilities on as few sites as possible.

8. Officer Response.

Comment noted, however, on balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period, and the need to manage waste close to source in line with national policy it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester		X	
2. Hurst Farm, Lydney	X		
3. Land at Lydney Industrial Estate, Lydney	X		

10. Please give a reason for your answers to Question 9.

Existing land at Lydney is zoned for industrial purposes. Transport links for waste through the Forest of Dean constitute a major difficulty. Consideration to using water borne transport (eg. through Lydney docks) could be considered. Foss Cross industrial estate is located in an area otherwise important for its agricultural and historical importance - close to Roman site at Chedworth etc and therefore should not be considered as suitable for waste disposal.

10. Officer Response.

Comments noted. Support for Lydney sites noted. It is acknowledged that transport is a key consideration. PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely

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to need to be supported by a detailed Transport Assessment and Travel Plan. The potential for sustainable modes of transport is noted. Lydney Docks has significant potential but currently there are no barged freight movements. In relation to Foss Cross whilst the agricultural and historic importance of the local area is acknowledged, the site itself is already in use as a household recycling centre. Any impact of further development on the historic or natural environment will therefore be limited. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. These sites will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the sites forward as allocations at this stage does not mean that the sites are unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

nb. Overlaps with options set out in Q7. Same argument applies - concentrate services on as few sites as possible. Those outside Zone C are less suitable but could be used if options are restricted (especially applies to Lydney Site - see previous comments)

12. Officer Response.

Support noted. Also see previous responses.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

NO

13. Officer Response.

Noted.

14. Do you have any comments on the Executive Summary?

Concisely expresses the major issues to be addresses in disposal of residual waste. Composting and recycling alone will not address the total need for waste disposal. More could be made of the need to recycle at domestic level and reduce the amount of packaging used by shops / supermarkets. Site options argument clearly made.

14. Officer Response.

Comments noted. The publication WCS will set out the Council's policy approach towards recycling and waste reduction.

15. Do you have any comments on Section 1?

NO

15. Officer Response.

Noted.

16. Do you have any comments on Section 2?

Clearly addresses the need for the Gloucestershire WCS to conform to EEC Landfill Directive (1999/31/EC) with need to reduce levels of biodegradable municipal waste to 35% of 1995 levels by 2020. Also noted the point that even with recycling and composting residual waste treatment sites will be required making incineration and combined heat & power plants essential.

16. Officer Response.

Support noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of

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different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.Where bidders have proposed incineration as part of their solution for Gloucestershire, the Bidders will be expected to explore the possibility of CHP and ensure that the plant is CHP enabled.

17. Do you have any comments on Section 3?

Aside from concerns about development of Greenfield rules (eg Nastend) makes the case for using existing sites in Zone C clearly. Case for development outside Zone C less clear - with possible exception of Lydney.

17. Officer Response.

See response to Q4. Support for Zone C noted.On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period and the need to manage waste close to source in line with national policy it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS national policy and any other material considerations.

18. Do you have any comments on Section 4?

Good to see that a clear monitoring framework to see if strategy is succeeding or failing is in place. I would like to see more detail and observations on cost-benefit analysis of various observations in this section. Notwithstanding argument for multiple sites, still feel there is need to concentrate WDS in two or three sites.

18. Officer Response.

Support noted. The proposed monitoring framework is included for illustrative purposes only and will be worked up in more detail in support of the publication WCS having regard to comments made in response to the site options consultation.

19. Do you have any comments on the Sustainability Appraisal reports?

No

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

No

20. Officer Response.

Noted.

Number 206 Type IND Name Gervase Hamilton Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

There are a limited number of sites for waste disposal in Gloucestershire. The proposed sites conform to Govt.policy document PP10,the Regional Waste Strategy and draft SW Regional Policy document W2,. They are outside the Severn Valley flood plain and ,have reasonable road access to the population to be served.Some are rather close to existing /proposed housing developments and therefore those sites far from housing should be favoured in the first instance eg:Javelin Park,Moreton Valence.

2. Officer Response.

Support for Zone C noted. It is acknowledged that within Zone C, some sites are closer to existing and/or proposed development than others. However, where sensitive receptors such as housing, do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning conditions. Whilst the provision of new waste management facilities within urban areas has the potential to have some impact on existing occupant, it is important that waste is managed close to source and the urban areas of Gloucester and Cheltenham are where most of Gloucestershire's waste is generated. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. Support for Javelin Park and Moreton Valence noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X		X
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester	X		
8. Nastend Farm, Stroudwater Business Park	X		
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

As stated previously,larger sites not close to existing or planned residential areas and with good transport links should be favoured over other dsmaller more inconvenient locations.

Number 206 Type IND Name Gervase Hamilton Organisation not applicable/not provided

4. Officer Response.

Comment noted. Please see response to Q2.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Disagree

6. Please give a reason for your answer to Question 5.

Sites adjacent to residential areas should be avoided where possible.They are likely to cause problems with trafffic access,noise,fumes and environmental issues generally.

6. Officer Response.

Comment noted. Please see response to Q2.

7. Do you support the identification of sites outside Zone C?

I do not support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

The proposed sites,although already zoned for industrial use,are small and have inadequate transport links.If used they should only be considered for small scale residual household waste recycling.Small scale sites of this type are unlikely to be economically viable and expensive to run.

8. Officer Response.

Comment noted. It is essential that the WCS provides a clear strategy setting out what will be built and where. This will provide certainty and confidence to the development industry and help bring proposals forward. The Council's preferred strategy is to focus the location of new strategic waste management facilities on the area defined as Zone C. This approach is considered to be consistent with national policy (PPS10) and the Regional Waste Strategy. Although the preferred focus for strategic waste management is Zone C, a number of other sites were identified outside this zone in the Forest of Dean and Cotswold District in order to provide suitable flexibility and support for the Zone C sites. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester		X	
2. Hurst Farm, Lydney	X		
3. Land at Lydney Industrial Estate, Lydney	X		

10. Please give a reason for your answers to Question 9.

Road links at Lydney are better.Consideration might be given to transporting waste by water through Lydney Dock.

10. Officer Response.

Support for Lydney sites noted. Please see response to Q8 in relation to the allocation of sites outside of Zone C. The Publication WCS contains Core Policy WCS14 which covers sustainable transport.

11. Do you support the approach of using a combination of sites within and outside Zone C?

Number 206 Type IND Name Gervase Hamilton Organisation not applicable/not provided

I do not support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

Zone C sites are favoured because of their size and location and are likely to be more economiucally viable than smaller sites outside.

12. Officer Response.

Support for Zone C noted. Please see response to Q8 in relation to sites outside of Zone C.

17. Do you have any comments on Section 3?

There is much to be said for concentrating waste disposal on two or three sites in the County.Experience elsewhere has shown that are economic gains from such concentration particularly if the proposed sites are close to roads/rail links.Two or three large sites in Zone C might be more acceptable from the environmental point of view than multiple smaller sites.

17. Officer Response.

Comment noted. The site options consultation paper identifies 13 potential sites, 10 in Zone C, 3 outside. At the present time it is not known whether one large residual waste treatment facility will come forward or several smaller ones. The council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the county. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. The advantages and disadvantages would be investigated further during the procurement process. Waste management and the move away from landfill are driven by the Climate Change agenda. Climate change is a wider issue which the development of this solution can positively contribute. Carbon footprint is assessed as part of the life cycle analysis (WRATE). GCC will ask for details of emissions management as well as any other foreseeable environmental impacts and plans to mitigate these will be requested during competitive dialogue. DEFRA have commented on this issue directly by stating: "The plans could also make an important contribution to the drive to tackle climate change by delivering estimated net carbon savings of 33,800 tonnes in 2020, compared to the current arrangements, or 64,700 tonnes if the final technology solution includes combined heat and power."

18. Do you have any comments on Section 4?

Incineration alone (even with built-in environmental protection) is unlikely to be as effective or as economic as incineration combined with heat and power schemes.

18. Officer Response.

Comment noted. At the present time the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. Importantly, the type of technology chosen has no direct bearing on the delivery and implementation element of the WCS (the principles of which will apply regardless of which technology or technologies come forward). The potential role of Combined Heat and Power (CHP) is fully acknowledged.

Number 389 Type ENV Name Tom Hancock Organisation Campaign to Protect Rural

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	

4. Please give a reason for your answers to Question 3.

The Cheltenham and Tewkesbury District of the Campaign to Protect Rural England (CPRE) have considered the proposals for waste treatment facilities in Gloucestershire and wish to comment on the sites at Wing moor listed as numbers 1, 2, and 10 in Zone C in your consultation paper. There is a long history of concerns about the waste disposal operations at Wingmoor Farm East and West. These concerns include, in particular, issues over unpleasant odours emanating from the disposal sites and increasing lorry movements on unsuitable roads. Despite objections raised by the local community, these problems still persist. In our view no increase in waste disposal or waste treatment operations should be entertained at the Wingmoor sites unless and until better access can be provided to the trunk road system and the other highly unsatisfactory issues at Wing moor are resolved to the satisfaction of the local communities affected. We have not commented on specific sites outside Tewkesbury Borough. We suggest, however, as a principle, a preference for locations which are further away for residential areas and with better access to the main road and motorway network.

4. Officer Response.

Comments noted. The re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community. In terms of odour, the consultation focuses on finding sites suitable for waste treatment, not disposal. Whilst landfill can give rise to problems of odour, waste treatment facilities involve waste being delivered into an enclosed building, with little opportunity for odours to escape to the air. Importantly, the areas of Wingmoor Farm (East and West) currently used for landfill do not form part of this consultation and the operational status of these sites is also beyond the scope of the consultation. Furthermore, odour, along with noise and dust, is a detailed matter that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any sensitive receptors. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning conditions. In terms of increasing lorry movements, PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. In terms of the final comment relating to locations away from residential areas, clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. To identify sites in remote areas away from Gloucester and Cheltenham would be contrary to national and regional policy.

Number 405 Type IND Name G A Handley Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I feel that it would be an expensive mistake to choose the Cheltenham and District Clay Club site for inclusion in the expansion of the Wigmoor Tip. Many thousands of man hours have been expended in making this Club one the best layouts in Gloucestershire, not to mention the enormous cost of raising the earthworks that surround the site. There are too few shooting facilities in Gloucestershire, but a surfeit of tips and landfills, quarries and such blots on the landscape. Bishops Cleeve was once a lovely place surrounded by wide open spaces, airfields and green fields. Since the buzz word is now recycling why the need to expand a tip and destroy a paying concern? Why not tip alongside the River Severn and prevent the repeated flooding? I here is also the matter of compensation; I cannot imagine the Council dipping into the coffers and creating an equal clay club for us. We have many members from all walks of life. Closure of the club would mean the travelling of many miles to find a similar facility which would add traffic and pollution to the area - therefore increasing carbon foot printing. The old Labour cry "No confiscation without compensation", does not make sense. Leave us alone. Go somewhere else. The alternative will be too expensive.

17. Officer Response.

Comments noted. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the 'inclusion criteria' for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that his site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 192 Type PC Name Sue Hanman Organisation Cam Parish Council

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

There should be a range of smaller facilities around the County, which would minimise the distance that waste would have to be moved.

2. Officer Response.

Comment noted. The focus on Zone C ensures that the majority of waste which is produced at Gloucester and Cheltenham is treated close to source, thereby reducing the distance the waste needs to travel. The use of transfer facilities to 'bulk-up' waste from smaller collection vehicles into larger vehicles, will help to reduce the number of separate trip movements that need to be made for the waste to reach the treatment/recovery facility/facilities. On balance having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

Without much more information on both the sites and the technology proposed, it is very difficult to make an informed judgement.

4. Officer Response.

Comment noted. The site options consultation paper included a descriptive site schedule of each of the 13 sites as well as photographs and maps. Further information was made available as part of the supporting evidence base. This information is considered to be sufficient. In terms of technology, the Council is currently technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that

Number 192 Type PC Name Sue Hanman Organisation Cam Parish Council

would stifle innovation in line with the waste hierarchy.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

6. Please give a reason for your answer to Question 5.

It is beleived that waste treatment should be local where possible. New developments should at least include such measures as community composting, technology to deal with food waste etc.

6. Officer Response.

Support noted. See previous response to Question 2 in relation to local facilities. In terms of new developments, the Publication WCS includes a core policy on waste reduction requiring a waste minimisation statement for all major development. This will help to ensure the provision of recycling, composting facilities etc.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

It is beleived that waste treatment should be dealt with locally wherever possible.

8. Officer Response.

Support noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

Without much more information on both the sites and the technology proposed, it is very difficult to make an informed judgement.

10. Officer Response.

Comment noted. See previous response to Question 4.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

See above

12. Officer Response.

See previous response.

Number 435 Type IND Name A R Harber Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I refer to your recent communication to the Cheltenham and District Clay Club, where you state the shooting ground has been identified as a possible site for waste treatment. It is also noted that the shooting ground is the only site which has an activity already in place and is being used successfully for sporting purposes. Shooting grounds are in very short supply in this and other areas, to lose this ground would have a devastating affect on local sporting people. The club has spent a lot of money and time developing this site, it would be a sad day indeed to lose it. Attached is a document from Clay Shooting Magazine (November 2009) showing Political Support for Shooting Sports, perhaps Gloucestershire County Council would like to continue to be a leader in providing a sports facility for shooters in this area.

17. Officer Response.

Comments noted. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the 'inclusion criteria' for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that his site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

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1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Waste should be treated as close to its arising as possible. Having sites only in zone C will mean large transport overheads from outlying areas of Cotswold district and the Forest-of-Dean, and transport costs will rise steeply with peak oil ocurring early in the contract period.

2. Officer Response.

Comment noted. The proposed focus on Zone C means that the majority of waste generated in Gloucestershire (i.e. that produced at Gloucester and Cheltenham) will be treated as close to source as possible. The use of transfer facilities (as happens currently) to bulk-up waste from smaller collection vehicles into larger vehicles, will help to reduce the number of separate trip movements that need to be made from rural areas to proposed facility/facilities.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch			
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre	X		
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester	X		
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

Given the track record of the operators, we believe that all of the Wingmoor sites should be closed at the end of the current capacity licence. Nastend Farm is greenfield: other sites are available and there is clear GCC self-interest which should be countered. All of the other sites are suitable for most processes, however I discount mass burn incineration because of the lack of flexibility cf. the unknowns of future residuals tonnage from fig. 4 of the main report. Netheridge should be used as an AD plant for sewage, municipal food waste, and other food waste only.

4. Officer Response.

Comments noted. The areas of Wingmoor Farm (East and West) currently used for landfilling do no form part of this consultation and the operational status of these sites is also beyond the scope of the consultation. Whilst Nastend Farm is Greenfield, importantly it is allocated for employment use in the Stroud District Local Plan. However, the site has not been taken forward into the Publication WCS because, although the County Council is the landowner, following discussions with the County Council's Waste Disposal Authority (WDA) it would appear that there is significant uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore, the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the Publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

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In respect of Netheridge, the site has not been taken forward into the Publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore, the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the Publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. The site's existing Anaerobic Digestion (AD) capacity for waste water and other assorted wastes is recognised and any additional increase in these facilities would be considered through other criteria-based policies in the WCS. In terms of incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10 which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Agree

6. Please give a reason for your answer to Question 5.

Waste treatment should be proximate to its arising.

6. Officer Response.

Support noted. The integration of waste management facilities into the urban extensions would allow waste from these developments and the wider Gloucester and Cheltenham area to be treated close to source in line with national and regional policy. However, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. It is the Government's intention to formally abolish the South West RSS. Importantly however, the evidence that informed the preparation of the RSS may still be considered a material consideration. Furthermore, despite the potential abolition of the RSS, local authorities are expected to continue to progress their own development plan documents including waste plans, with enough land being provided for waste management facilities to support the sustainable management of waste.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

Waste treatment should be proximate to its arising. But note also the restrictions in the WLP for waste facilities in the AONB. Facilities should be in scale and unobtrusive in the AONB.

8. Officer Response.

The WPA notes the support for identifying sites outside of Zone C. However, on balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations. The WPA agrees with the comments on the desirability of waste treatment being proximate to arisings. With respect to facilities in the AONB, the WCS does avoid the allocation of strategic sites in the AONB but recognises the potential need for appropriate

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local facilities serving local waste management needs.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney	X		
3. Land at Lydney Industrial Estate, Lydney	X		

10. Please give a reason for your answers to Question 9.

See Q08 answer.

10. Officer Response.

See previous response.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

See Q08 answer.

12. Officer Response.

See previous response.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

Bourton industrial estate. Sharpness - various sites.

13. Officer Response.

Bourton Industrial Estate was initially investigated (Ref Site 013) but it was found to fall outside of the 16km boundary from the fringe of the urban areas of Cheltenham and Gloucester and therefore no further assessment was carried out on the site. Please refer to Technical Evidence Paper WCS-N (Section 4 and Appendix A). The Sharpness Docks area did have some technical assessments carried out on it and two other parcels of land were submitted as part of the call for sites exercise. However, the landowners of the Sharpness Docks area (Ref Site 547) indicated that the land was not available for residual waste management treatment and of the other parcels submitted one was in conflict with the landowners wishes and the other did not fulfil the inclusion criteria outlined in Technical Evidence Paper WCS-N. For details of site 547 assessments please see Technical Evidence Paper WCS-N and its appendix C.89 and for the other parcels please refer to Technical Evidence Paper WCS-O (pages 30 and 31).

14. Do you have any comments on the Executive Summary?

No additional comments to my applicable responses above, apart from to point out that a figure of 60% is used for recycling, whereas the WCS-A data report says that 70% is possible, so this figure should replace 60% throughout the reports and associated documents.

14. Officer Response.

Comment noted. The WCS Technical Paper WCS-A Waste Data does state that Approximately 70% of the materials produced by a household can be re-used recycled or composted. (Page 9, Para 24). The County Council in it role as Waste Disposal Authority (WDA) has set a target of at least 60% by 2020. This is 10% higher than the national target of 50% over the same period. Clearly, Gloucestershire (and indeed all WDAs in the country) want to get to the position where they recycle and

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compost as much waste as possible. However, this is not just dependent on waste collection systems; significantly it is also dependent on people taking more responsibility.

15. Do you have any comments on Section 1?

1.15 Of course the WCS is about the residual waste project - it is ablout selecting the sites for the RWP and the two are inextricably linked: 2.39 says the RWP is key, and 2.41 says the wcs has a role to,play in delivering the RWP ... Hence also the WCS MUST be adopted before a residual waste contract selection is made other wise it has little point. This has been far too much work and cost to just tick a box!

15. Officer Response.

Comment noted. Whilst the WCS and residual project are inter-related the site options consultation focused on sites only. The residual project is about much more including technology, contract length, value for money etc. Whilst a key role of the WCS is to guide the residual project site selection process it is not just about sites. The Publication WCS will also deal with a broad range of waste-related issues such as waste minimisation and recycling/composting.

16. Do you have any comments on Section 2?

I don't happen to accept the RSS reccomendations. There is a conflict between 2.39 saying the RWP is key and 1.15 saying it is nothing to do with the RWP!

16. Officer Response.

Comment noted. It is the intention of Government to abolish RSS. Importantly however, the evidence that informed the preparation of the RSS may still be considered as a material consideration. Furthermore, local authorities are expected to continue to progress their own development plan documents including waste plans, with enough land being provided for waste management facilities to support the sustainable management of waste. In terms of the linkages between the site options consultation and the residual project, whilst the two are linked, the site options consultation was focused solely on the merits of the overall locational strategy and specific sites identified whereas the residual project is concerned with a range of factors including technology, value for money etc.

17. Do you have any comments on Section 3?

Site options should include lists of which technologies and processes are acceptable and unacceptable for each site, as in the Habitat regs document, plus environmental (70% "most important" score) and other constraints such as noise and times of operation, etc, if sites are near to residential areas. I have already commented on specific sites in Q4 and Q8.

17. Officer Response.

Comment noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. In terms of proximity to residential areas, clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10 which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the Companion Guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which

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states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. Operational hours and noise mitigation are detailed matters to be addressed should a detailed proposal come forward on any of the sites identified.

18. Do you have any comments on Section 4?

4.10 once again demonstrates the direct link with the RWP and shows the fallacy of 1.15. Otherwise section 4 is very sensible.

18. Officer Response.

Comment noted. The WCS is linked to the residual waste project as set out in paragraph 4.10, however the site options consultation was designed to inform the WCS only, hence the statement at paragraph 1.15 that the consultation is not about the Council's residual waste PFI project.

19. Do you have any comments on the Sustainability Appraisal reports?

The SA headline objectives in table 1 are laudable, and will be used to hold GCC to account. BUT the summary by objectives table 3 is indecipherable to a lay person, making it somewhat laughable to call the stage 1 SA a "non-technical summary". In the stage 2 SA, the tables are somewhat clearer but the objectives could have been named in the actual tables.

19. Officer Response.

Comments noted. Essentially, the SA Objectives test the broad sustainability of the emerging plan. The SA is one part of the overall evidence base that needs to be considered in preparing the WCS. Other factors include specific pieces of technical evidence e.g. on highways or flood risk, as well as market/deliverability considerations. It is acknowledged that the SA reports are quite lengthy and require thorough reading. However this is largely due to the technical nature of the process. Non-technical summaries were available and these were made as simple as possible to understand. The WPA contends that the SA process does add value to the planning process.

20. Do you have any comments on the Habitat Regulations report?

Very interesting. Again, useful evidence to be used to hold GCC to account farther down the RWP selection process.

20. Officer Response.

Comment noted.

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3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
2. Areas A, B & C at Wingmoor Farm West		X	

4. Please give a reason for your answers to Question 3.

After talking to your officers at the Bishops Cleeve open day regarding the County WCS, I now have a better understanding of the need to have a modem and efficient waste unit or even a combination of one or more units. I have a personal interest in not having the new waste plant at Wingmore Farm as I am a member of the Cheltenham Clay Shooting Club. The club has been long established and is the only site, under consideration, to fulfill an active social use. The club has over the years spent a great deal of time, effort and money in order to achieve what is regarded as a fine shooting ground, so much so that the membership is full and there is a waiting list to join. The club has spent many years changing a piece of waste ground into a landscaped area that is of real use (and would take many years to replace), even though the lease runs out in 4 years time we would hope to extend it if Wing more Farm is not chosen as the preferred site in the WCS. One of the main objections many people will have to the plant being sited at Wingmore Farm is the increase of traffic. The roads are already very busy and the many extra lorry loads would exasperate the situation greatly. Lf the Government force through its RSS plans (which I hope they do not) then I can foresee real problems with the present road system coping. There are some proposed sites which are not near large areas of population where the traffic would not be such a big issue. Wingmore Farm is quite northerly (only Easter Park is more so) and I would of thought that as all the waste from the whole of Gloucestershire will be taken by road to the waste plant ,then a site more centrally located within the County would be more beneficial. Please would you consider using a site which would not cause traffic problems for the Bishops Cleeve area. Please consider a site which at the present does not have a useful social purpose and regenerate one of the less used or derelict sites. Thank you for the opportunity to have my say.

4. Officer Response.

Comments noted. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the 'inclusion criteria' for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that his site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations. PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. For the Wingmoor sites, potential capacity issues were flagged up which are likely to necessitate mitigation such as junction improvements. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and

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highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. The Wingmoor sites are in close proximity to Cheltenham, which, along with Gloucester is where most of Gloucestershire's waste is generated. Treating this waste as close to source as possible is consistent with national and regional policy. The transport impacts of moving waste from further afield will be reduced through the use of appropriate waste transfer and bulking.

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3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
7. Land north of Railway Triangle, Gloucester		X	

4. Please give a reason for your answers to Question 3.

We write in response to the current review and plans being discussed for a "waste site" in Gloucester area. As a long term resident of Armscroft Place it is very alarming that the "Meyers Road plan for waste treatment is even being considered. The area is a well very established residential area, with a lot of wildlife and local residential population. The area off Meyers Road should clearly be considered for either further housing - it is not on a flood plain - or public open space. Since the Council agreed to the "Allstone" development several years ago, against some strong local protests, there has been regular and consistent noise pollution (throughout the day and night) and it is both unfair and inappropriate to consider further development of this kind. Within the plans and strategy drawn up by the Council, there are other locations which clearly have a far better access point and would not have such a disruptive influence on the local residency and wildlife. Surley it makes sense for a proactive and supportive Council to use sites or venues that have as little impact and influence on the Community. The area off Meyers Road would clearly be better suited to extended Park facility and possibly more Housing - helping the environment in the City Centre as well as maintaining and helping the development of wildlife and facilities for the residents of Gloucester. We would along with the majority of residents will be clearly be against any plans to develop the site off Meyers Road for anything to do with Waste treatment.

4. Officer Response.

The WPA is aware of the close proximity of the Armscroft estate to this site. It is an established and attractive residential area. There are also various businesses in the area as well as large areas of vacant brownfield land on the Railway Triangle / Railway Corridor. In terms of the reference to local wildlife, given the nearby Armscroft Park and overgrown areas on the currently disused Railway Triangle, it is likely that there are small populations of e.g. urban foxes, hedgehogs, various bird species. However, the biodiversity assessment for this site and the wider railway corridor area has a neutral impact score and highlights that there are no wildlife designations or protected species on or very close to Site 7. It is presumed that the respondents use of term 'the area off Myers Road' is actually a reference to Site 7. The suggestion that this be used for more housing or public open space is not a matter for the County Council it is a matter for the land owner. Notwithstanding the above, the site has not been taken forward into the Publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material

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considerations.

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1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

It is important to look at all available space within a more significant and wider geographical area that Zone c - it is clearly possible that an area outside of Zone c that is far more suitable has been missed out that does not impact on congestion/public nuisance and health and other areas

2. Officer Response.

It is essential that the WCS provides a clear strategy for the location of new waste management facilities. The designation of Zone C is consistent with national and regional policy and reflects the fact that most of Gloucestershire's waste is produced at Gloucester and Cheltenham. It also takes account of environmental constraints including AONB and floodplain. A number of other sites outside Zone C were identified in preparing the site options consultation paper. Many were ruled out for various reasons such as flood risk, deliverability, landscape impact etc. Three sites outside Zone C were included in the consultation and offer the potential to provide flexibility and support for the sites in Zone C. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre	X		
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

Some areas are clearly already established for treating waster - i.e. Number 9 - some areas like 7 are clearly going to impact on a number of issues - residential impact/wildlife and transport

4. Officer Response.

Comment noted. The use of existing waste management facilities is consistent with national policy however regard must be had to the cumulative effect of previous waste disposal facilities on the care and well being of the local community including any significant adverse impacts on environmental quality, social cohesion and inclusion or economic potential. (PPS10). The sites identified in the site options consultation paper included a mix of sites, mainly previously developed land or land with planning permission for development. This included several sites that accommodate existing waste management operations. In respect of Site 7 - Land North of

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Railway Triangle, the site has not been taken forward into the publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

6. Please give a reason for your answer to Question 5.

Worth considering any location that does not interfere with residential welfare or transport and congestion

6. Officer Response.

Comment noted. The WCS has a role to play in ensuring all new development is underpinned by appropriate waste management infrastructure (e.g. recycling facilities). The site options consultation paper however focuses on identifying a site or sites suitable for accommodating a strategic waste management facility and there has been no interest from either waste operators or the developers leading the urban extensions in providing this type of facility as part of the development. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

There are clearly going to be opportunities to consider sites that are far better based for this - i.e. not near City Centre or large urban residential areas

8. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source and the urban areas of Gloucester and Cheltenham are where most of Gloucestershire's waste is generated. This approach is consistent with national policy in PPS10, which emphasises that planning strategies should 'provide a framework in which communities take more

Number 181 Type IND Name Rob Harris Organisation not applicable/not provided

responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities'. It is also consistent with regional policy. It is also pertinent to note that the companion guide to PPS10 states that, 'with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development'. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney	X		
3. Land at Lydney Industrial Estate, Lydney	X		

10. Please give a reason for your answers to Question 9.

They are not as urban residential based locations and would be far better suited in preventing transport issues etc

10. Officer Response.

Support noted. See previous response to Question 8.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

It would depend on what sites within Zone C is to be used - 1,2 and 9 are placed well

12. Officer Response.

Support for Sites 1, 2 and 9 noted.

14. Do you have any comments on the Executive Summary?

It is well constructed and compilied but not sure that all the facts have been considered - whilst there is clearly issues to be resolved and taken in account a site needs to be prioritised based on the most limiting impact on local residents, urban conservation and transport etc

14. Officer Response.

Support noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should `provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements.

Number 181 Type IND Name Rob Harris Organisation not applicable/not provided

15. Do you have any comments on Section 1?

Clearly laid out and structured - but appears to provide a feeling that a judgement has taken place

15. Officer Response.

Comment noted. No judgement has taken place. The results of the consultation have been taken into account in preparing the Publication WCS. Whilst the site options consultation sets out the Council's preferred strategy, this is not been finalised and views are invited.

16. Do you have any comments on Section 2?

No

16. Officer Response.

noted

17. Do you have any comments on Section 3?

Yes - at no stage until now have any residents - particularly in our area of Barnwood but consulted and I believe this is similar in other areas for Zone C - I would have thought it common practise to have at least liased with the residents in the areas being considered

17. Officer Response.

Comment noted. Properties close to the 13 sites were written to in advance of the consultation through a pre-consultation mail-out and were written to again during the consultation. The consultation involved a broad range of activities with a considerable number of businesses, residents and other organisations being advised and invited to comment.

18. Do you have any comments on Section 4?

No

18. Officer Response.

Noted.

19. Do you have any comments on the Sustainability Appraisal reports?

Very comprehensive and thorough

19. Officer Response.

Support noted.

Number 189 Type IND Name Jackie Harris Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

To minimise transportation of waste and to limit development to areas of the county which are already under development (i.e. to protect AONBs and other areas of beauty such as Forest of Dean).

2. Officer Response.

Support for Zone C noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X		
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre	X		
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester	X		
8. Nastend Farm, Stroudwater Business Park	X		
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West			

4. Please give a reason for your answers to Question 3.

I know all of the areas except Moreton Valence. Several are already associated with waste, others are linked to industrial estates. I think devt in areas that are away from housing and away from our built and natural heriateg are important.

4. Officer Response.

Comments noted. The re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community. In terms of development away from housing, clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

Number 189 Type IND Name Jackie Harris Organisation not applicable/not provided

6. Please give a reason for your answer to Question 5.

I agree as long as waste facilities are located in business/industrial areas and not in residential areas.

6. Officer Response.

Comment noted. See previous response in relation to proximity of waste uses to housing. In relation to the RSS, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I'm not sure/I don't know

8. Please give a reason for your answer to Question 7.

Lydney Ind est sounds OK

8. Officer Response.

Comment noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney	X		

10. Please give a reason for your answers to Question 9.

Lydney Ind est sounds OK. i don't know the other two sites

10. Officer Response.

Comments and support noted. See previous response to Question 8.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

I support the proposal as loing as it protects natural and built heritage and keeps transportation costs (financial and environmental) to a minimum .

12. Officer Response.

Comment noted.

14. Do you have any comments on the Executive Summary?

The map is confusing. It says Zone C is in purple, but there are two shades of purple! Is zone C all purple or only the light/dark. it's impossible to tell until you start

Number 189 Type IND Name Jackie Harris Organisation not applicable/not provided

looking at specific sites.

14. Officer Response.

Comment noted. Maps of Zone C are provided on pages 28 and 29 of the site options consultation document. Both maps show Zone C as shaded purple. There is only one shade of purple clearly showing the extent of Zone C.

Number 334 Type IND Name Graham Harris Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

We live in the area adjacent to the railway triangle and do not wish to see the value of our property affected by these plans, we consider the land not suitable for the use suggested.

2. Officer Response.

Comment noted. In relation to Site 7, Land North of Railway Triangle, the site has not been taken forward into the Publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
7. Land north of Railway Triangle, Gloucester		X	

4. Please give a reason for your answers to Question 3.

This land is too close to local housing and therefore not suitable for the purpose suggested.

4. Officer Response.

Comment noted. See previous response.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

Suitable Not Suitable Don't Know

Number 334 Type IND Name Graham Harris Organisation not applicable/not provided

1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

11. Do you support the approach of using a combination of sites within and outside Zone C?

I do not support the approach of using a combination of sites from within and outside Zone C

Number 354 Type IND Name Mike Harris Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I am writing to voice my concern over the inclusion of the Wingmoor farm east, site designation "C" in your proposal for an extension at the Bishops Cleeve refuse site. I am writing on selfish grounds, because I am a member of the clay pigeon club currently situated on the site, firstly there are very few sites for clay shooting in the area, and this is the best I have come across. I use the club on a regular basis along with my father and son; it is a true family friendly club. With many members who are always willing to help and make everyone feel welcome, I understand that the members have spent a great deal of money and time to build this facility over the years. A lot of landscaping and tree planting have taken place to help improve the appearance of the site. If this site was chosen for the next phase of expansion, a lot of people who use this facility would feel a little aggrieved. Without the following problem of locating a new venue for this type of sports facility, with the planning permission that would be required, along with the objections from any who live near to the new site who would complain about extra traffic and noise pollution. So in finishing, I would ask for any parties involved in the final decision to bare a few of the previous comments in mind when coming to their conclusion, after all it is only a small area of land that can meet very few needs for the council, but suits it present occupiers very well indeed. I do not envy your position in having to choose a site, and understand that your final choice will no doubt upset a group of people, as I can think of no one who would welcome such a site on their doorstep, but please don't take our facility from us, thank you.

17. Officer Response.

Comments noted. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the inclusion criteria for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that this site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 381 Type IND Name David Harris Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

because it is needed

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park	X		
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

sites are not close to housing

4. Officer Response.

Support for sites (Javelin Park, Moreton Valence, Nastend Farm and Netheridge) is noted. With regard to Site 8, Nastend farm, the site has not been taken forward into the publication WCS because although the County Council is the landowner, following discussions with the County Council's Waste Disposal Authority (WDA) it would appear that there is significant uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore, the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the Publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations. With regard to Netheridge Sewage Treatment Works, the site has not been taken forward into the publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore, the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the Publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. The site's existing Anaerobic Digestion (AD) capacity for waste water and other assorted wastes is recognised and any additional increase in these facilities would be considered through other criteria-based policies in the WCS.

Number 67 Type ENV Name Roisin Harte Organisation Gloucestershire VCS

17. Do you have any comments on Section 3?

The VCS Task Group agreed the following position statement on waste and response to the Consultation on the Waste Core Strategy: 1.The VCS Waste Task Group support a broad and positive approach to waste management. Waste solutions should be local and diverse, and should be planned to take into account climate change, together with global oil and gas depletion. 2.We acknowledge that alternatives to landfill must be found, but these alternative solutions should be part of a broader approach to waste reduction. 3.Greenhouse gas balances should be a critical driver for any waste solutions being explored. 4.The County Council's consultation on Potential Waste Sites in Gloucestershire does not discuss potential technologies for these sites, therefore making response difficult. The VCS Waste Group therefore opposes the use on any of these sites for waste disposal if incineration is the technology used. 5.The VCS Waste Task Group is strongly against incineration for the following reasons: a)Greenhouse gas emissions - a recent study carried out for the current Mayor of London showed that incineration scenarios produce the most greenhouse gas emissions when compared with other forms of waste management b)Loss of natural resources - incineration does not allow recovery of natural resources. It is a linear approach to consumption and waste, promoting the destruction of valuable resources (resources - consumption - waste - incineration = no possibility of waste being re-used as part of the cycle of consumption) c)Health risks - incinerator emissions are a major source of fine particulates, toxic metals and over 200 organic chemicals including known carcinogens and hormone disrupters. Toxic fly ash is light and readily windborne - two large cohort studies in America show that fine particulate air pollution results in increases of all-cause mortality (incidentally, a reduction in all-age all-cause mortality rate is currently a target for the Gloucestershire Local Area Agreement). In addition, there are numerous risks associated with the transport and subsequent treatment of hazardous waste created by incineration d)Inflexibility - once a long-term (25-30 year) contract is entered into, this effectively closes off alternative solutions to waste management. As an incinerator has to operate at maximum capacity, this also acts as a disincentive to recycling (see example of Hampshire, where the majority of local authorities are now failing to meet recycling targets - source Friends of the Earth, England, Wales and Northern Ireland 2007) in order to meet the waste volume contractual commitment. e)Environmental and Visual impact - a large incinerator will have a significant visual impact on the area where it is situated, as well as the amount of traffic it will generate on the county's roads. 6.The VCS Waste Task Group supports the following positive models for waste management: a)Mechanical Biological Treatment (MBT) together with Anaerobic Digestion (AD) - MBT residual waste is inert and non-toxic and can be buried with no additional costs or penalties. Biogas is derived from AD and can be used to generate energy (see Observer 22 Nov 2009 Food waste to provide homes with green gas by Ecotricity, a locally based company). The 'waste' from AD can be spread on land. b)Positive waste management currently carried out in Devon, where a not-for-profit community company has the recycling waste management contract. See http://www.mdcrl.org/ for more details. c)Manchester City Council has recently commissioned 5 MBT plants. Action required from the Gloucestershire Environment Partnership: 7.The VCS Waste Task Group would like the Gloucestershire Environment Partnership to consider the above position statement and consultation response and as a strategic partnership, to respond with its own position statement on waste.

17. Officer Response.

Comments noted. Dealing with each in turn. In terms of the broad approach to waste management, the comments are noted. With regard to greenhouse gases, waste management and the move away from landfill are driven by the Climate Change agenda. Climate change is a wider issue which the development of this solution can positively contribute. One of the key aims of the residual project is carbon reduction and to contribute to GCC's climate change agenda, a move away from landfill will do this in a number of ways. Less waste to landfill means that less greenhouse gases will be produced. In addition, if recyclable materials are able to be extracted using the technologies, this will replace the use of virgin materials and if energy is able to be produced by the solution, this will lessen the pressure on fossil fuels. GCC currently has a climate change strategy and it, along with its district partners, has also produced the Joint Municipal Waste Management Strategy, which also considers such issues. The aim of the residual waste project is not to phase out all of its waste disposal sites, but to find an alternative to landfill and to be less reliant on this unsustainable method of dealing with the county's residual waste. In terms of technology, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a

Number 67 Type ENV Name Roisin Harte Organisation Gloucestershire VCS

matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. With regard to health, PPS10, states that 'modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health'. In terms of incineration acting as a disincentive to recycling, GCC will be procuring a solution that aligns with its recycling and composting objectives. Tonnages are based on achieving 60% recycling capacity and are reviewed regularly using the most up to date figures. 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling as reality proves the contra argument. All sites have been subjected to an initial landscape assessment, with some sites being identified as more suitable than others. The design and layout of any proposal (and therefore its potential visual impact) will be matters for negotiation at the planning application stage should a detailed proposal come forward. A design and access statement and landscape appraisal are likely to be required. PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. In terms of MBT, the Council as explained is currently technology neutral. A response from Simon Pickering of the GEP has been received. See elsewhere in this schedule.

Number 136 Type IND Name Roisin Harte Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I write to object to the use of all 13 of the sites listed for possible waste treatment in Gloucestershire on the grounds that: Any of these sites could be used for incineration, which I oppose. Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. The long term costs to the taxpayer will be higher with incineration. Incinerators act as a disincentive to reduce, reuse and recycle. The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. Large incinerators in other areas of the country are already deemed to be a mistake.

17. Officer Response.

With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 104 Type IND Name Gerald Hartley Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I write to object to the use of all 13 of the sites listed for possible waste treatment in Gloucestershire on the grounds that: a.. Any of these sites could be used for incineration, which I oppose. b.. Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. c.. I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. d.. The long term costs to the taxpayer will be higher with incineration. e.. Incinerators act as a disincentive to reduce, reuse and recycle. f.. The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas. g.. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. h.. Large incinerators in other areas of the country are already deemed to be a mistake.

17. Officer Response.

With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 352 Type IND Name Ian Hartley Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Preservation of rural character elsewhere

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
7. Land north of Railway Triangle, Gloucester		X	
9. Netheridge Sewage Treatment Works	X		

4. Please give a reason for your answers to Question 3.

Ref. Area 7 Uneconomic costs of investigation/infrastructure relative to usable area. Increased road use in area - residential, school and emergency services. Prevailing wind (from S.W) would increase nuisance - litter/odours Increased nuisance due to gull population - nesting site close by at hospital/city Use as waste sites runs contrary to various leisure schemes mooted for railway triangle Residential Development would be more sensible and profitable for the council.

4. Officer Response.

Comments noted. In relation to Site 7, Land North of Railway Triangle, the site has not been taken forward into the publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

Number 352 Type IND Name Ian Hartley Organisation not applicable/not provided

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
3. Land at Lydney Industrial Estate, Lydney	X		

10. Please give a reason for your answers to Question 9.

Minimal impact with regard to access, nuisance

10. Officer Response.

Support for Lydney Industrial Estate noted. However, having regard to forecast capacity requirements (i.e. the number of sites needed) and the need to manage waste close to source in line with national policy, it has been decided not to allocate any strategic sites outside the area referred to as Zone C (the central area of Gloucestershire). As this site is outside Zone C it is not being taken forward. Also, the lack of waste industry interest in response to this site through the site options consultation (2009) raises question marks over the deliverability of the site for waste management purposes. It should be noted that existing facilities for waste management are present on the site and their contribution to the County's waste network is recognised. Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

Other (Network Rail) land alongside railway corridor (s)

13. Officer Response.

Comment noted. Network Rail were consulted in relation to specific sites as part of the deliverability study and in response they indicated that these sites were not available for residual MSW treatment. As part of the same consultation they were also asked if they have any other land in Gloucestershire which would be available and suitable for residual MSW treatment. None of their landholdings were put forward.

Number 345 Type IND Name Ania Hartsoe Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

We would prefer for the site to be in a less inhabited area.

2. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre	X		
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works		X	
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

The area #7 (land north of Railway Triangle, Gloucester) is within walking distance from the centre of the County Seat. It's directly adjacent to a residential area and three primary schools. Widden, St Peter's and Elmbridge, with a large number of parents on foot, taking their children to and from schools and local playgroups. Traffic of the already existing Allstone Company causes disruption and wear to the road surface. A waste site would create even more traffic and would spoil the air in the neighbourhood and also for the county hospital. Road traffic in the area is already an issue - with the level crossing, access to the hospital and cars related to the hospital and schools parked on the road - there really is no space for heavy dump truck traffic!

4. Officer Response.

Comments noted. In relation to Site 7, Land North of Railway Triangle, the site has not been taken forward into the publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves

Number 345 Type IND Name Ania Hartsoe Organisation not applicable/not provided

HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Disagree

6. Please give a reason for your answer to Question 5.

Who wants to live next to a waste disposal/treatment site?!

6. Officer Response.

Comment noted.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

There are areas outside of Zone C that are still central to the County (i.e easily accessible from all over the County) which are not as densely inhabited.

8. Officer Response.

Comment noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

Number 345 Type IND Name Ania Hartsoe Organisation not applicable/not provided

10. Please give a reason for your answers to Question 9.

1(a) seems to be a remote, fairly accessible location.

10. Officer Response.

Comment noted. Having regard to forecast capacity requirements (i.e. the number of sites needed) and the need to manage waste close to source in line with national policy, it has been decided not to allocate any strategic sites outside the area referred to as Zone C (the central area of Gloucestershire). As Foss Cross is outside Zone C it is not being taken forward. Also, the lack of waste industry interest in response to this site through the site options consultation (2009) raises question marks over the deliverability of the site for waste management purposes. Furthermore, the Environment Agency (EA) has raised concerns in response to this site in relation to groundwater issues. Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I do not support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

We disagree with the possibility of having a waste site in central Gloucester.

12. Officer Response.

Comment noted. Site 7 is not going forward into the Publication WCS for the reasons already given.

Number 188 Type IND Name Eva Harvie Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Zone C Gloucester/Cheltenham/Stroud/Tewkesbury is close to residential areas and am not confident of the health and safety risks due to air pollution from HGVs particularly for option 7.

2. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should `provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. In terms of health and safety from air pollution associated with HGV movements, although the construction of a new waste facility could lead to an increase in HGV movements (depending on previous/existing use which could mean a relative decrease in trips) there is nothing to suggest that any such increase would be of such magnitude that it creates a health and safety risk through increased air pollution. Furthermore, any planning application would need to be supported by a detailed Transport Assessment (TA). It is also pertinent to note that PPS10, states that 'modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health'.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		X
2. Areas A, B & C at Wingmoor Farm West	X		X
3. Easter Park, Ashchurch	X		X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works		X	
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

Close to residential areas.

4. Officer Response.

Number 188 Type IND Name Eva Harvie Organisation not applicable/not provided

Comment noted. See previous response to Question 2.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Disagree

6. Please give a reason for your answer to Question 5.

I am in favour of including areas outside zone C - it is expected that in the not too distant future Zone C will be as polluted as other major cities in the UK and we need to ensure that this area retains some quality otherwise people will move elsewhere. It is unrealistic to expect that any area outside Zone C cannot be used for waste disposal.

6. Officer Response.

Comment noted. It is essential that the WCS presents a clear spatial strategy setting out what will be built and where. The designation of Zone C is consistent with national and regional policy which requires waste to be treated close to source. Gloucester and Cheltenham are where most of Gloucestershire's waste is generated and providing facilities within Zone C is therefore consistent with this approach. On balance having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

Concerns about the type of waste disposal (the mechanism) and how it will affect surrounding communities. For this reason the burden needs to be shared not concentrated in one area. Also concerned about air pollution by HGVs and congestion in an already congested urban area.

8. Officer Response.

Support for sites outside Zone C is noted, however, on balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations. In relation to the concerns about how facilities will affect surrounding communities; at the present time the Council is 'technology neutral' with no decision having been made on the technology or combination of technologies that will be used to treat Gloucestershire's residual municipal waste. The concerns about the need to share the burden of waste management and the problems of concentration on one area are recognised. Government guidance in PPS10 does require planning authorities to consider the cumulative effect of previous waste disposal facilities on the well-being of the local community, including any significant adverse impacts on environmental quality, social cohesion and inclusion or economic potential.However Government guidance also indicates that generally modern waste management facilities should not have negative effects on surrounding communities. Paragraph 7.31 of the Companion Guide to PPS10 states that With advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. One of the key planning objectives of PPS10 is to "...enable waste to be disposed of in one of nearest appropriate installations". Paragraph 30 states that "Modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health." In relation to air pollution and congestion as a result of HGVs; as part of the process of site selection, all sites identified in the site options paper have been subjected to an initial assessment by Gloucestershire Highways. Any strategic site

Number 188 Type IND Name Eva Harvie Organisation not applicable/not provided

allocation made in the Publication WCS will be supported by a further highway assessment with any necessary mitigation (e.g. junction improvements) clearly identified as site-specific requirements. Should a planning application be progressed on any of the strategic site allocations this would need be supported by a detailed Transport Assessment and Travel Plan.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney	X		
3. Land at Lydney Industrial Estate, Lydney	X		

10. Please give a reason for your answers to Question 9.

It makes sense to have a site in the Cotswolds and FOD. In order to protect the greenfield sites urban areas seem to be the only places that are expanded whilst residents in outlying villages complain of access issues. Surely, there needs to be a balance?

10. Officer Response.

Comments noted. The WCS seeks to balance competing interests for land and to promote sustainable development. There are many criteria within PPS10 for Waste Planning Authorities to consider when identifying sites for waste management purposes. The WPA followed a due process to arrive at the list of 13 sites presented for consultation. This process is outlined within the consultation document and presented in further detail within Technical Evidence Paper WCS-N. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. These sites will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the sites forward as allocations at this stage does not mean that the sites are unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

To share the burden is preferable

12. Officer Response.

Comment noted. See previous response in relation to sites outside Zone C.

14. Do you have any comments on the Executive Summary?

I have difficulty understanding the Government Policy (PPS10) and the Regional Waste Strategy (Pge 7) that "waste should be disposed of close to where it is produced". Waste is produced all over the County, but it has fallen on the urban areas to dispose of it. However, the WCS states the "preferred sites" are those named within this document.

14. Officer Response.

Comment noted. It is not practical or viable to provide hundreds of small-scale waste facilities across the entire County. The urban areas including in particular Gloucester and Cheltenham are where most of Gloucestershire's waste is produced and as such it is considered appropriate to locate waste management facilities close to these areas. The designation of Zone C is designed to ensure that most of Gloucestershire's waste is treated close to source.

16. Do you have any comments on Section 2?

Number 188 Type IND Name Eva Harvie Organisation not applicable/not provided

with reference to 2.3/4. reduction in tonnage of household waste and the need to identify sites for waste treatment. The new measures for more items to be recycled to be put in place early next year

16. Officer Response.

Comment noted. The focus of the consultation is on residual municipal waste which cannot be recycled or composted. This figure is estimated to be around 150,000 tonnes per annum.

17. Do you have any comments on Section 3?

As above regarding preference for Zone C because it is close to where waste is produced. Concerns over air quality, congestion from HGVs also option of using Railway Triangle - would need to build new infrasture to make it workable.

17. Officer Response.

See previous response in relation to impact on urban areas, air quality and congestion. In relation to Site 7, land north of the railway triangle, the site has not been taken forward into the publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 307 Type IND Name G Hastings Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre	X		
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park	X		
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West			X

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Disagree

7. Do you support the identification of sites outside Zone C?

I do not support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney		X	
3. Land at Lydney Industrial Estate, Lydney	X		

11. Do you support the approach of using a combination of sites within and outside Zone C?

I do not support the approach of using a combination of sites from within and outside Zone C

14. Do you have any comments on the Executive Summary?

No

14. Officer Response.

Noted.

15. Do you have any comments on Section 1?

No

15. Officer Response.

Noted.

Number 307 Type IND Name G Hastings Organisation not applicable/not provided

16. Do you have any comments on Section 2?

No

16. Officer Response.

Noted.

17. Do you have any comments on Section 3?

No

17. Officer Response.

Noted.

18. Do you have any comments on Section 4?

No

18. Officer Response.

Noted.

19. Do you have any comments on the Sustainability Appraisal reports?

No

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

No

20. Officer Response.

Noted.

Number 290 Type IND Name Irene Hatton Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

I think waste sites should be scattered around Gloucestershire near to local need

2. Officer Response.

Comment noted. It is essential that the WCS identifies a clear spatial strategy. The proposed focus on Zone C includes Gloucester and Cheltenham which is where most of Gloucestershire's waste is generated. Treating this waste close to source will reduce the distance travelled and is consistent with national and regional policy. The site options consultation included sites in all Gloucestershire Districts/Boroughs other than Cheltenham (where no suitable sites were found to be available). Ten of these sites were located inside Zone C and 3 outside. Views were invited on whether a combination of sites should be used. At this stage it has not been determined whether treatment of residual waste will take place on one large site or several smaller sites. The council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the county. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. The advantages and disadvantages would be investigated further during the procurement process.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
10. The Park, Wingmoor Farm West			

4. Please give a reason for your answers to Question 3.

We already have waste sites here and they are ideal

4. Officer Response.

Support for Wingmoor Farm sites noted.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Agree

6. Please give a reason for your answer to Question 5.

I feel waste should be dealt with near to area it arises

6. Officer Response.

Support noted. The integration of waste management facilities into the urban extensions would allow waste from these developments and the wider Gloucester and Cheltenham area to be treated close to source in line with national and regional policy. However, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals.

Number 290 Type IND Name Irene Hatton Organisation not applicable/not provided

Furthermore, Government's intention to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

I have already stated my feelings on this question

8. Officer Response.

See previous response.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney	X		
3. Land at Lydney Industrial Estate, Lydney	X		

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

as before

12. Officer Response.

See previous response.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

no

13. Officer Response.

Noted

14. Do you have any comments on the Executive Summary?

no

14. Officer Response.

noted

15. Do you have any comments on Section 1?

no

15. Officer Response.

noted

Number 290 Type IND Name Irene Hatton Organisation not applicable/not provided

16. Do you have any comments on Section 2?

no

16. Officer Response.

noted

17. Do you have any comments on Section 3?

no

17. Officer Response.

Noted

18. Do you have any comments on Section 4?

no

18. Officer Response.

Noted.

19. Do you have any comments on the Sustainability Appraisal reports?

no

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

no

20. Officer Response.

Noted.

Number 301 Type IND Name Terence Hayes Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

We are already overburdened with waste sites Wingmoor Farm East and West and the Park

2. Officer Response.

Comment noted. The re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community. The proposed focus on Zone C is consistent with national and regional policy and reflects the fact that most of Gloucestershire's waste is produced at Gloucester and Cheltenham.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

Area overloaded with waste sites already. Access road and railway bridge unsuitable for HGV's

4. Officer Response.

Comments noted. The re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community. PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. For the Wingmoor Farm sites the assessment identified a likely net increase in traffic and the need for potential capacity improvements in certain locations near the sites. With regards to access, any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

6. Please give a reason for your answer to Question 5.

Environmentally friendly schemes to cut down on traffic movements & reduction of waste to landfill

Number 301 Type IND Name Terence Hayes Organisation not applicable/not provided

6. Officer Response.

Support noted. The provision of waste facilities within urban extensions at Gloucester and Cheltenham would allow a large proportion of Gloucestershire's waste to be treated close to source, thereby reducing the number of waste miles travelled. This would be consistent with a range of national and regional policy. However, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

Need several sites around the County so movement of waste products is reduced to a minimum.

8. Officer Response.

Support noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

Do not know the areas

10. Officer Response.

Noted.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

To reduce movement of waste & residual waste products.

12. Officer Response.

Support noted.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

Number 301 Type IND Name Terence Hayes Organisation not applicable/not provided

No

13. Officer Response.

Noted

14. Do you have any comments on the Executive Summary?

No

14. Officer Response.

Noted.

15. Do you have any comments on Section 1?

No

15. Officer Response.

Noted.

16. Do you have any comments on Section 2?

No

16. Officer Response.

Noted.

17. Do you have any comments on Section 3?

Detailed attention must be taken to consider 1 - Council tax paying residents close to any site 2 - Road access & residential traffic 3 - Road safety - mud on roads 4 - Railway Bridge 5 - Odours from sites 6 - Flies from sites

17. Officer Response.

Comments noted. Dealing with each in turn. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. For the Wingmoor sites, the assessment identified a potential net increase in traffic and the need for mitigation in certain locations to help increase capacity. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. Odour is a matter that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any sensitive receptors. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated

Number 301 Type IND Name Terence Hayes Organisation not applicable/not provided

through the use of appropriate planning conditions.

18. Do you have any comments on Section 4?

same comments as above

18. Officer Response.

See previous comments.

19. Do you have any comments on the Sustainability Appraisal reports?

No

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

No

20. Officer Response.

Noted.

Number 161 Type IND Name Michael Hayward Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
4. Javelin Park, Haresfield		X	

17. Do you have any comments on Section 3?

I write to object to the use of The Javelin Park site, Haresfield as well as any of the other sites listed for possible waste treatment in Gloucestershire on the grounds that: Any of these sites could be used for incineration, which I oppose. Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. The long term costs to the taxpayer will be higher with incineration. Incinerators act as a disincentive to reduce, reuse and recycle. The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. Large incinerators in other areas of the country are already deemed to be a mistake by many of those counties who have already embarked on such a process.

17. Officer Response.

With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 163 Type IND Name Jean Hayward Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I write to object to the use of The Javelin Park site, Haresfield as well as any of the other sites listed for possible waste treatment in Gloucestershire on the grounds that: Any of these sites could be used for incineration, which I oppose. Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. The long term costs to the taxpayer will be higher with incineration. Incinerators act as a disincentive to reduce, reuse and recycle. The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. Large incinerators in other areas of the country are already deemed to be a mistake by many of those counties who have already embarked on such a process.

17. Officer Response.

With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 300 Type IND Name Margaret Hazel Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I write to object to the use of all 13 of the sites listed for possible waste treatment in Gloucestershire on the grounds that: Any of these sites could be used for incineration, which I oppose, Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. The long term costs to the taxpayer will be higher with incineration. Incinerators act as a disincentive to reduce, reuse and recycle. The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. Large incinerators in other areas of the country are already deemed to be a mistake.

17. Officer Response.

With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 271 Type IND Name D Heath Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I wish to make it clear that I strongly oppose the propsed site of a waste incinerator plant within th "Gloucester Triange". The residents of Swallow Park & Armscroft area of Barnwood already have to contend with dust & noise from the ever growing and expanding Allstones site. The construction of a waste site ontop of this would make this a very unpleasant & unbearable area in which to live.

17. Officer Response.

Comments noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. With regard to Site 7, Land North of Railway Triangle, the site has not been taken forward into the Publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the Publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 196 Type IND Name Michael Hedderman Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I'm not sure/I don't know

2. Please give a reason for your answer to Question 1.

Whilst understanding the reasons for focusing the search within the Zone C area, I feel that there is a case for considering sites outside this area. This could be to identify an alternative or a supporting site.

2. Officer Response.

Comment noted. The focus on Zone C is consistent with national and regional policy. Sites outside this area will be considered on their merits having regard to relevant criteria.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch		X	
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

Site should not be close to residential areas or offices. Proposed site 7 is especially unsuitable.

4. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. In relation to Site 7, Land North of Railway Triangle, the site has not been taken forward into the publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto

Number 196 Type IND Name Michael Hedderman Organisation not applicable/not provided

the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the Publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

6. Please give a reason for your answer to Question 5.

Urban extension will increase the need for waste management and should be considered for the location of facilities

6. Officer Response.

Support noted. The WCS has a role to play in ensuring all new development is underpinned by appropriate waste management infrastructure (e.g. recycling facilities). The site options consultation paper however focuses on identifying a site or sites suitable for accommodating a strategic waste management facility and there has been no interest from either waste operators or the developers leading the urban extensions in providing this type of facility as part of the development. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

This increases the options available

8. Officer Response.

Support noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester		X	
2. Hurst Farm, Lydney		X	
3. Land at Lydney Industrial Estate, Lydney	X		

Number 196 Type IND Name Michael Hedderman Organisation not applicable/not provided

10. Please give a reason for your answers to Question 9.

See Q4

10. Officer Response.

See previous response.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

Lessens the burden, and impact, of a single site.

12. Officer Response.

Comment noted. The Publication WCS identifies four strategic site allocations within Zone C. Other sites will be considered on their merits having regard to relevant criteria.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No

13. Officer Response.

Noted.

14. Do you have any comments on the Executive Summary?

No

14. Officer Response.

Noted.

15. Do you have any comments on Section 1?

No

15. Officer Response.

Noted.

16. Do you have any comments on Section 2?

No

16. Officer Response.

Noted.

17. Do you have any comments on Section 3?

Considering sites close to office or residential areas is totally not acceptable. Such sites should be removed from this, and any future consideration. This is not a case of being NIMBY, I consider this condition to apply to any and all residential or office areas.

17. Officer Response.

Comment noted. See previous response to Question 4.

18. Do you have any comments on Section 4?

Number 196 Type IND Name Michael Hedderman Organisation not applicable/not provided

No

18. Officer Response.

Noted.

19. Do you have any comments on the Sustainability Appraisal reports?

No

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

No

20. Officer Response.

Noted.

Number 173 Type IND Name Michael Heenan Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

I believe that there are other sites, within the County but outside zone C, that may be more suitable

2. Officer Response.

Comment noted. It is essential that the WCS provides a clear steer on the preferred location for new waste management facilities. 'Zone C' has been identified as the preferred location for a number of reasons which are clearly articulated within the site options consultation document including the fact that it avoids the floodplain and Cotswold Area of Outstanding Natural Beauty (AONB) is consistent with Government Policy (PPS10) and the Regional Waste Strategy and reflects the fact that Gloucester and Cheltenham are where most of the County's waste is produced. The site selection process started with a long-list of 329 sites both within and outside Zone C. This long-list was reduced to 110 sites taking into account factors such as site size, location and then reduced further to 13 sites having regard to issues such as flood risk, highways and availability. These 13 sites were included in the site options consultation paper. Of the 13 sites, 3 were located outside Zone C and included in the consultation; land at Hurst Farm, Lydney, Lydney Industrial Estate and Foss Cross. Other sites outside Zone C were ruled out for the reasons above. It is pertinent to note that in response to the consultation, no alternative sites outside Zone C were put forward.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West	X	X	X

4. Please give a reason for your answers to Question 3.

I believe that the areas suggested are already in use by reputable organisations, the removal of which would detract from facilities available to the taxpayers of Gloucestershire.

4. Officer Response.

Comment noted. The representation relates to the sites identified at Wingmoor Farm East and Wingmoor Farm West. Although these areas are already in use for waste management including landfill, they are capable of accommodating a new waste management facility without displacing existing operations. Furthermore, the provision of a new residual waste treatment facility will help divert waste from landfill, thereby avoiding landfill taxes to the benefit of the taxpayers of Gloucestershire.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

Number 173 Type IND Name Michael Heenan Organisation not applicable/not provided

6. Please give a reason for your answer to Question 5.

I do not have sufficient knowledge of the subject, besides which the RSS will probably be scrapped following the next General Election so the question is likely to become entirely hypothetical

6. Officer Response.

Comment noted. The integration of waste management facilities into the urban extensions would allow waste from these developments and the wider Gloucester and Cheltenham area to be treated close to source in line with national and regional policy. However, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

Restricting sites to zone C puts too tight a straitjacket on the process, there are likely to be several suitable sites elsewhere.

8. Officer Response.

Comments noted but, on balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

Don't know requires no further explanation.

10. Officer Response.

Noted

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

Seems common sense, see also my answer to Q8

12. Officer Response.

Number 173 Type IND Name Michael Heenan Organisation not applicable/not provided

Support noted. Also see previous response.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No

13. Officer Response.

Noted.

14. Do you have any comments on the Executive Summary?

No

14. Officer Response.

noted

15. Do you have any comments on Section 1?

No

15. Officer Response.

noted

16. Do you have any comments on Section 2?

No

16. Officer Response.

noted

17. Do you have any comments on Section 3?

I disagree with the proposals for Wingmore Farm West.

17. Officer Response.

Comment noted. See Officer responses relating to Site 2 -Areas A, B & C Wingmoor Farm West.

18. Do you have any comments on Section 4?

no

18. Officer Response.

Noted.

19. Do you have any comments on the Sustainability Appraisal reports?

no

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

no

20. Officer Response.

Noted.

Number 414 Type IND Name M Heenan Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I am writing to you, as a member of Cheltenham and District Clay Club, to state my opposition to the inclusion of the Gun Range near Wing moor Farm West in your list of proposed sites for future waste processing. (Site Area: c.5.3.ha.) I note that your consultation document states that 'the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club.' You may rest assured that the current gun club has no intention of moving out of the site and I will be writing to Tewkesbury Borough Council to make my views known. I felt that it would do no harm however to state my objections to you as well. I note that the site is the only one with a current activity located on it where there is no mention I your plan of alternative arrangements. Facilities for clay pigeon shooting are scarce in Tewkesbury Borough and the present site, with its distance from concentrations of housing, is one of the few suitable. Several of the alternative sites are already vacant. The gun club has been in residence for many years and has spent much money, time and effort in improving the site, including the planting of more than 400 trees. If the site were converted to waste processing these would be lost, environmentally unacceptable these days. There are already considerable waste processing facilities near the site. These already generate large volumes of heavy traffic through Cheltenham and Bishops Cleeve. Any expansion would increase these traffic levels to an unacceptable level. Wing more Farm is not central to Gloucestershire, much waste from the centre, east or south of the county would have to be transported long distances by road causing expense and damage to the environment. I hope you will consider the above arguments before reaching your decision.

17. Officer Response.

Comments noted. Dealing with each in turn. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the 'inclusion criteria' for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that his site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 127 Type UTL Name Jane Hennell Organisation British Waterways

4. Please give a reason for your answers to Question 3.

We note that of your preferred specific sites only one in Zone C has an impact on British Waterways, namely the site at Netheridge Sewage Treatment Works, Gloucester. As you are aware the site is adjacent to the Gloucester and Sharpness Canal on the outskirts of Gloucester. British Waterways have no objection to the land being used for a Waste Site however we would wish at this point to state that we may request mitigation measures if necessary which might include landscape/ habitat and visual improvements as possibly towpath improvements as part of the proposal. Also as the site is adjacent to the Canal it may be possible to bring construction materials in the short term and waste to the site in the long term by boat. Commercial waterways, such as the Gloucester and Sharpness Canal are particularly suitable for short-hauls, for the movement of high-volume, low-value products which are not unduly time-sensitive, and for addressing niche market goods where water carriage can provide a cost-effective alternative to the local road network, as outlined in PPG13: Transport. There are also opportunities for waterside developments to use waterborne freight in the construction cycle, in the delivery of supplies and the removal of waste wherever practical, economic and environmentally desirable. Only 0.04% of UK freight is transported on waterways owned or managed by British Waterways. Examples of freight transport projects at present include construction material delivered by water for developments such as the Olympic Park in East London and the new Guardian Media Group HQ at King's Cross; and the 'Waste by Water' waste transfer scheme for Edmonton on the Lee Navigation in East London, which will remove 45,000 lorry movements per year. We would also wish to the Waste Authority of opportunities to use Canal Water in heating and cooling in industrial processes. Further details can be obtained from our Utilities team and we would ask that if this site is taken forwards we explore such opportunities further with you.

4. Officer Response.

Support for Netheridge site noted. The comments relating to potential mitigation measures are noted. The potential for water-borne movement of construction materials is acknowledged as is the potential for canal water to be used in heating and cooling in industrial processes is acknowledged. Notwithstanding the above, the site has not been taken forward into the Publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore, the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the Publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. The site's existing Anaerobic Digestion (AD) capacity for waste water and other assorted wastes is recognised and any additional increase in these facilities would be considered through other criteria-based policies in the WCS.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

Firstly, as discussed recently we are aware that a third party is promoting our land at Sharpness for a MSW. To clarify, British Waterways has not changed its stance from our previous formal response to you dated 29th April 2009 and we do not wish to put forward our land at sharpness for consideration as a potential site at this time.

13. Officer Response.

Comment noted. As highlighted in Technical Evidence papers WCS-N and WCS-O, this site will not be considered unless British Waterways as the landowner wish it to be considered.

Number 155 Type IND Name Margaret Highton Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I write to object to the use of all 13 of the sites listed for possible waste treatment in Gloucestershire on the grounds that: Any of these sites could be used for incineration, which I oppose as there will be CO2 emissions from burning waste which causes global warming, the greatest treat to the planet. Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. The long term costs to the taxpayer will be higher with incineration. Incinerators act as a disincentive to reduce, reuse and recycle. The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas. There will also be emissions from the transportation. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. Large incinerators in other areas of the country are already deemed to be a mistake. Worldwide, America has not built incinerators since 1995 and New Zealand and Eire are no building any incinerators.

17. Officer Response.

With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 223 Type IND Name Rachel Hill Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

I am not clear as to the reasons why the search is focused on this area. This is already a highly populated area and trafic is already a challenge. Why add to the problems?

2. Officer Response.

It is essential that the WCS provides a clear steer on the preferred location for new strategic waste management facilities. 'Zone C' has been identified as the preferred location for a number of reasons including the fact that it avoids the floodplain and Cotswold Area of Outstanding Natural Beauty, is consistent with Government Policy (PPS10), the Regional Waste Strategy and reflects the fact that Gloucester and Cheltenham generate most of the County's waste. These reasons are clearly set out in the consultation paper. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

Accessibility. I cannot begin to imagine the use of the Railway Triangle as a potential site. This site could be much better used for other things. It is too close to the city centre and would cause significant traffic concerns.

4. Officer Response.

Comment noted. In relation to Site 7, Notwithstanding the above, the site has not been taken forward into the Publication WCS because the site does not have direct

Number 223 Type IND Name Rachel Hill Organisation not applicable/not provided

access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the Publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations. Please see response to Q2.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

6. Please give a reason for your answer to Question 5.

Waste planning should be a key part of ALL future developments and not ignored or assumed it will be covered elsewhere.

6. Officer Response.

Support noted. The WCS has a role to play in ensuring all new development is underpinned by appropriate waste management infrastructure (e.g. recycling facilities). The site options consultation paper however focuses on identifying a site or sites suitable for accommodating a strategic waste management facility and there has been no interest from either waste operators or the developers leading the urban extensions in providing this type of facility as part of the development. Furthermore, Government's intention to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

All options could be considered. As previously mentioned we should not add to transport and traffic issues within the city.

8. Officer Response.

Comments noted. Clearly the provision of new waste management facilities in urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source and the urban areas of Gloucester and Cheltenham are where most of Gloucestershire's waste is generated. This approach is consistent with national policy in PPS10, which emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. It is also consistent with

Number 223 Type IND Name Rachel Hill Organisation not applicable/not provided

regional waste policy. Additionally, It is also pertinent to note that the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney	X		

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

Some balance is required. We cannot have people living in rural areas ignoring the issue of waste.

12. Officer Response.

Support noted. It is essential that the WCS provides a clear strategy setting out what will be built and where. This will provide certainty and confidence to the development industry and help bring proposals forward. The Council's preferred strategy is to focus the location of new strategic waste management facilities on the area defined as Zone C. This approach is considered to be consistent with national policy (PPS10) and the Regional Waste Strategy. Although the preferred focus for strategic waste management is Zone C, a number of other sites were identified outside this zone in the Forest of Dean and Cotswold District in order to provide suitable flexibility and support for the Zone C sites. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 103 Type IND Name Elizabeth Hillary Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I write to object to the use of all 13 of the sites listed for possible waste treatment in Gloucestershire on the grounds that: 1) Any of these sites could be used for incineration, which I oppose. 2) Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. 3) I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. 4) The long term costs to the taxpayer will be higher with incineration. 5) Incinerators act as a disincentive to reduce, reuse and recycle. 6) The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas. 7) Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. 8) Large incinerators in other areas of the country are already deemed to be a mistake.

17. Officer Response.

With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 139 Type DCLLR Name Sue Hillier-Richardson Organisation

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

I do not think one large single site is the best option I would prefer to see many smaller local sites with a combination of technologies to include MBT(making compost) and anaerobic digestion. No options which produce 'hazardous waste material such as fly ash' should be considered as this needs landfilling and is a potential health risk In relation to sites outside Zone C - I cannot see why some localised options which could be accommodated inside 'agricultural style' buildings cannot be sited in the AONB or Green Belt This would improve the ability of communities to be connected with the disposal of their own waste and possibly promote reduction, re-using and recycling.

2. Officer Response.

Comment noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. With regards to the use of smaller, local sites outside Zone C, on balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
4. Javelin Park, Haresfield	X		
6. Land at Moreton Valence	X		
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

I would use the following criteria to order sites for consideration: - Sites with the lowest 'disamenity' factor for nearby residents - Sites close to transport links such as M5 or A roads and which would require the fewest highway improvements - Sites which are liable to flood should not even be in the mix Based on these criteria, I believe that the 3 Wingmoor Farm sites at Bishop's Cleeve should be ruled out. There are large housing developments, particularly close to the Wingmoor Farm East and West sites and along the A435 in both directions. Residents experience considerable disamenity, at present, from waste operations at these sites in terms of traffic noise, vibration and exhaust pollution; dirt flies, vermin and odour. Any additional facilities would not improve the situation. There is already an existing hazardous waste site at Wingmoor Farm which may still be in existence in addition to this proposal. This site is disamenity enough for residents as there are siginicant

Number 139 Type DCLLR Name Sue Hillier-Richardson Organisation

impacts on the 'health and well being of residents' as a result of it. The HIA being carried out by the PCT in association with the Wingmoor Farm Liaison Forum have yet to report their findings. The GCC Health O&S are waiting for this report in order to give an opinion on the matter of waste activities at the Wingmoor Site. It is surely a mistake to support this site at this stage until these reports have been produced All three sites would involve a net increase in traffic along the Stoke Orchard/Stoke Road at first, then the A435 either towards Cheltenham or towards Ashchurch. This will mean 'significant traffic on local roads' around Bishop's Cleeve and potential operational problems on A435 junctions in Bishop's Cleeve and Southam requiring junction improvements Part of the Wingmoor Farm West site has flooded in the past and is at risk of flooding from the River Swilgate. In addition, part of the site is occupied by the Gun Club which would mean the removal of this recreational activity. Members of the club have objected strongly, particularly as it is difficult to find sites for this type of activity. I think the following sites offer the least 'disamenity' to residents and the most favourable traffic / highway solutions: Javelin Park Moreton Valence Airfield Netherage Sewage Treatment Works All three would affect the fewest residential sites and are close to M5 and have good transport links.

4. Officer Response.

Comments noted. Dealing with each comment in turn. In terms of the criteria for site-selection, all sites have been subjected to an initial highway and flood risk assessment. Only suitable sites were included in the consultation document. In terms of proximity to neighbouring properties, whilst it is understandable for people to want waste facilities 'out of sight and out of mind', it is essential that waste is managed close to where it arises. In Gloucestershire's case, most waste is generated at Gloucester and Cheltenham. With regard to Wingmoor Farm the following response is made. In terms of the proximity of housing, clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. Odour, noise and dust are matters that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any 'sensitive receptors'. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning conditions. With regard to pollution it should be noted that planning and pollution control regimes are separate but complimentary. Pollution control is concerned with preventing pollution whilst planning controls the development and use of land. Waste planning authorities are expected to work on the assumption that the relevant pollution control regime will be properly applied and enforced. A modern treatment facility located on such a site would effectively treat the waste prior to landfilling in a closed building with strict odour controls and would stabilise the biodegradable element of the waste. Therefore, this is unlikely to exacerbate the existing situation in relation to odour, vermin and flies and could potentially improve it. PPS10 also states that, where concerns about health are raised, waste planning authorities should avoid carrying out their own detailed assessments rather they should ensure, through drawing from Government advice and research and consultation with the relevant health authorities and agencies, that they have any advice on implications for health.' The WPA duly sought the advice from the PCT/NHS through the site options consultation. In terms of traffic impact, the 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. For the Wingmoor sites, potential capacity issues were flagged up which are likely to necessitate mitigation such as junction improvements. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. In terms of flood risk, a desk-top flood-risk assessment was carried out on this site and although a small part of Area

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A appears to be adjacent to the flood zone for the River Swilgate, it does not actually fall within the known flood zone. As outlined in PPS25 a detailed flood risk assessment is required at planning application stage for all developments over 1ha in flood zone 1 and the effective disposal of surface water from development is a material planning consideration in determining proposals for the development and use of land. Therefore, the applicant would need to demonstrate that surface water arising from the site, as far as is practicable, is managed in a sustainable manner while reducing flood risk to the site and elsewhere, taking climate change into consideration. This would need to be demonstrated as part of the flood risk assessment. With regard to the gun club, Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the 'inclusion criteria' for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that his site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations. Support for Javelin Park, Moreton Valence and Netheridge noted.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

They could provide a local solution / combination approach. In relation to sites outside Zone C - I cannot see why some localised options which could be accommodated inside 'agricultural style' buildings cannot be sited in the AONB or Green Belt This would improve the ability of communities to be connected with the disposal of their own waste and possibly promote reduction, re-using and recycling.

8. Officer Response.

Comment noted. The Companion Guide to PPS10 does point to the potential use of redundant agricultural and forestry buildings and their curtilages. However, road access to these buildings is often very poor (county lanes) and no suitable sites were identified through the site selection process.With regard to Green Belts: PPS10 makes clear that green belts should be protected but there is also a 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. A number of the sites identified in the site options consultation are located within the Green Belt. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside

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Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney	X		
3. Land at Lydney Industrial Estate, Lydney	X		

Number 53 Type CCLLR Name Jeremy Hilton Organisation Gloucestershire County

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
7. Land north of Railway Triangle, Gloucester		X	

4. Please give a reason for your answers to Question 3.

I write to raise objections to the inclusion of land to the north of Railway Triangle, as a major waste site, in the council's Waste Core Strategy (WCS). The land is currently in the ownership of Allstone Sand & Gravel. This land is next to one of Gloucester's magnificent seven regeneration sites and was originally included in the embryonic regeneration masterplan for the Railway Triangle, being developed by the Gloucester Heritage Urban Regeneration Company (GHURC). Gloucester City Council has already backed a motion in my name to have the Allstone landholdings reinstated in the GHURC's Railway Triangle regeneration masterplan. I understand that GHURC are actively considering this, which is why the publication of draft masterplan has been delayed. It would be madness to allow land north of the Railway Triangle to become one of ten major waste sites in Gloucestershire - especially as the site is in the centre of Gloucester, next to major housing developments, a primary school and Gloucestershire Royal Hospital. The road network serving Myers Road, where Allstone is located, is already severely congested and certainly could not take any more heavy lorries. Already, the current uses on the Allstone landholdings are unsuitable for such an urban and residential location. To approve a waste site at this location and one, which might house a substantial waste incinerator, would be unacceptable. I have received a large number of written objections from my constituents who are worried about the intensification of waste processing on this land. Residents of Armscroft Estate and Swallow Park already have to put up with the noise and dust coming from this site, which has permission for a waste transfer station, won on appeal, to the planning inspector against local wishes. On Thursday 26th November Gloucester City Council debated the Waste Core Strategy and voted to request the removal of the land to the north of the Railway Triangle as a major waste site in the county's impending WCS for Gloucestershire. The city council also called for the county council to only proceed with a low carbon solution to dealing with the county's residual waste. The city council voted to oppose a waste incinerator as an option. My preferred use and I imagine that of GHURC, is that this land is best suited for housing, an extension of Armscroft Park (public open space) and high tech commercial enterprises; definitely not the processing of the county's waste. I don't want to see piles of rubbish stores here.

4. Officer Response.

Comments noted. The WPA is clearly aware of the current Allstone Sand & Gravel Ltd business and its close proximity to the Gloucester Heritage Urban Regeneration Company (GHURC) Railway Triangle site. From the WPA's perspective GHURC have yet to finalise its master-planning process, no planning applications have been submitted and thus significant uncertainties remain in terms of what will be developed on this railway site. Notwithstanding the above, the site has not been taken forward into the Publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential

Number 53 Type CCLLR Name Jeremy Hilton Organisation Gloucestershire County

capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

10. Please give a reason for your answers to Question 9.

On another matter in my division, I remain concerned about proposals to intensify the use of the Netheridge Sewage Works for the processing residual waste. Especially, as the access road is also bounded by residential properties and the quality of life here could be damaged by the county council's current suggestion in the draft WCS.

10. Officer Response.

Comment noted. Should the Netheridge site come forward it is most likely to be relatively small in scale and limited to Anaerobic Digestion (AD) only. The issue of access and trip movements would need to be carefully considered through a Traffic Assessment (TA) and the impact on amenity would be a matter of judgement in determining a planning application should a proposal come forward. Notwithstanding the above, since the site options consultation was undertaken in October 2009 and following discussions with the landowner it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. For this reason, it has been decided that this site will not be taken forward into the Publication WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 143 Type DCLLR Name Paul Hodgkinson Organisation Cotswold District Councillor

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester		X	

10. Please give a reason for your answers to Question 9.

I'm writing with regard to the consultation which you have been undertaking for potential waste sites in Gloucestershire. As the Cotswold District Councillor for the Churn Valley Ward which includes the Foss Cross site, the following are my views about the possible inclusion of that site. These are my own views and the views I've heard from my constituents who I've spoken to: 1.This area is totally rural and the infrastructure is poor. Only a declassified country lane serves the site and most traffic to it has to go via the hamlet of Calmsden - the increased volume of traffic would have a detrimental effect on the neighbouring villages. 2.The site is in an AONB. 3.The site is right next to the hamlet of Calmsden and near the villages of North Cerney and Chedworth - any expansion of it would impact adversely on the hamlet and its people. 4.Lorries and traffic would have to drive a considerable distance to reach the site, which therefore defeats the object of it being sustainable. Please therefore do NOT include this site for the treatment of residual waste, both residential and commercial.

10. Officer Response.

Comments noted. Dealing with each in turn. Whilst the area is rural the site already accommodates a waste facility. The re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community. It is assumed by infrastructure that the respondent is referring to transport infrastructure. PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. Whilst the site is located in the AONB this does not preclude the possibility of further development. In terms of impact on residents, clearly the provision of new waste management facilities has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which emphasises that planning strategies should 'provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities'. It is also pertinent to note that the companion guide to PPS10 states that, 'with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development'. It is highly unlikely that waste would be imported to Foss Cross from outside of the AONB because the purpose of including smaller dispersed sites would be allow waste to be treated closer to its arisings and improve sustainability. At this stage, without detailed modelling, it would not be possible to say for certain how this would affect lorry movements. Notwithstanding the above, having regard to forecast capacity requirements (i.e. the number of sites needed) and the need to manage waste close to source in line with national policy, it has been decided not to allocate any strategic sites outside the area referred to as Zone C (the central area of Gloucestershire). As this site is outside Zone C it is not being taken forward. Also, the lack of waste industry interest in response to this site through the site options consultation (2009) raises question marks over the deliverability of the site for waste management purposes. Furthermore, the Environment Agency (EA) has raised concerns in response to this site in relation to groundwater issues. Although the site has not been formally allocated in the Publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 303 Type PC Name Belinda Holder Organisation Bishops Cleeve Parish Council

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	

4. Please give a reason for your answers to Question 3.

Wingmoor Farm East & West, Bishops Cleeve Bishops Cleeve Parish Council wishes to express its strong opposition to the inclusion of the above sites within the plan for identified waste sites in Gloucestershire. The fact that the use of these sites for waste was appropriate when planning permission was first given does not automatically mean that it is acceptable now or that the conditions which applied then remain appropriate. Bishops Cleeve has grown substantially and the nearest housing development is within 220 metres of the proposed site boundary. Consent has recently been granted for another major development to the north of existing housing (i.e. Homelands). (approx 550 dwellings) The area has been identified as being capable of supporting a total of 1000 further dwellings in the near future. In the last 20 years development around the village means its numbers now reflect the size of a town e.g. Tewkesbury. In addition to housing there has been the building of a supermarket, expansion of the local comprehensive school and expansion of major employers. In future, as well as housing it is proposed to build a new Police HQ on the main by pass. All these impact on the road system around the area. The consultation document acknowledges the impact on road structures any development would produce both on Bishops Cleeve and neighbouring Stoke Orchard. The road structure was not designed to take the amount and type of traffic it now services. At pages 31 & 33 of the report it talks of significant traffic on local roads. It also says that some junctions are forecast to have operational problems. This is in connection with the extension of the current site use. Traffic surveys already show that roundabouts on the A435 are currently at around 100% capacity at peak times. Residents can be imprisoned in Bishops Cleeve at peak times if they are unable to enter roundabouts due to the amount of traffic heading for Cheltenham. These sites are on the Gloucester/Tewkesbury Greenbelt. This is an inappropriate use of green belt land. It was envisaged that by now, under the original planning consent for waste sites, the land would have been restored to its original profile. We have opposed the application for extended use of the sites. The current developments mean there is loss of amenity to Bishops Cleeve residents due to smells and dust - particularly for houses in closest proximity - noting that the predominant wind direction is westerly towards Bishops Cleeve. Also concerned that there could be currently unrecognised health impacts which could affect a substantial population. A health impact assessment process has started but is not yet complete. We are concerned that the type of waste facility has not been identified and consequently cannot but feel alarmed at the possible future impact on the health & well being of residents. There is a substantial traffic impact on Bishops Cleeve. Houses adjacent to Stoke Orchard Road will be subject to significant loss of amenity due to frequent HGV movements close to their houses. These houses were not built when the original planning application was granted. We are also concerned about the operating times of such developments and the impact this would have and feel it would be necessary to restrict these more than current licensed hours. We are disappointed that these sites have been identified as possible waste sites and feel that the current nature of the village residential developments are very different to those which existed when the original waste sites were given permission. We have opposed extension of the current licences on these sites as we believe the impact on a substantial population regarding health, amenity & infrastructure is not appropriate at this time. We urge that the above are removed from the identified sites due to their geographical siting in the Green belt, their proximity to a large area of housing, the lack of road infrastructure and the possible impact on health & amenity.

4. Officer Response.

Comments noted. Dealing with each point in turn. With regard to proximity of other development (existing and proposed) clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the

Number 303 Type PC Name Belinda Holder Organisation Bishops Cleeve Parish Council

companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. With regard to traffic and lack of road infrastructure, PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. In terms of green belt, whilst it is acknowledged that the Green Belt should generally be protected, PPS10, emphasises that local authorities should recognise the particular locational needs of some types of waste management facilities when defining detailed green belt boundaries and, in determining planning applications. In line with PPS10 companion guidance, should any sites within the Green Belt be specifically allocated within the WCS, it will need to be clearly indicated that they are for waste management purposes only. With regard to existing operations, the areas of Wingmoor Farm (East and West) currently used for landfill do not form part of this consultation and the operational status of these sites is also beyond the scope of the consultation. With regard to odour and dust, these are matters that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any sensitive receptors. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning conditions. In terms of health, PPS10 states that modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health. Furthermore, the detailed consideration of a waste process and the implications, if any, for human health is the responsibility of the pollution control authorities. PPS10 also states that, where concerns about health are raised, waste planning authorities should avoid carrying out their own detailed assessments rather they should ensure, through drawing from Government advice and research and consultation with the relevant health authorities and agencies, that they have any advice on implications for health. The WPA duly sought the advice from the PCT/NHS through the site options consultation. With regard to future operational hours, the operating hours of any future development at these sites would be a detailed matter to be dealt with at the planning application stage should a proposal come forward.

Number 291 Type IND Name D Holmes Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

we should be activley promoting zero land fill it is the only environmentally acccpetbale approach

2. Officer Response.

Comment noted. The site options consultation focuses on identifying sites suitable for the provision of strategic waste management facilities. The provision of such facilities will help to divert waste that would otherwise be sent to landfill.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch		X	
4. Javelin Park, Haresfield		X	
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence		X	
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works		X	
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

see answer 2 7 is totally unacceptable , at leats one of teh otehr sites is porbbaly designated for houisng close by

4. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. In relation to Site 7, it has not been taken forward into the Publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning

Number 291 Type IND Name D Holmes Organisation not applicable/not provided

that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the Publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Agree

6. Please give a reason for your answer to Question 5.

irresponsile not to include watse manaement in any proposla it only puts a burden on the already over burdened facilities and then becomes a NIMBY situation for the new developements. People should eb made responsibel for their waste.

6. Officer Response.

Support noted. However, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the Government's intention to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I do not support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

mainly as I think as already said we should move to a zero waste environment.

8. Officer Response.

See previous response.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney		X	
3. Land at Lydney Industrial Estate, Lydney	X		

10. Please give a reason for your answers to Question 9.

Hurts Farm (would have been good if you had consulted the landowner) and would require building on a green field site so option 3a is much more suitable as it is an existing industrial site with spare capacity.

10. Officer Response.

Comment noted. The Hurst Farm site was promoted by an agent acting on behalf of the landowner. Whilst the site is Greenfield it is allocated in the Forest of Dean Local Plan for mixed-use development. The principle of development in this location has therefore already been accepted. Support for Lydney Industrial Estate noted.

Number 291 Type IND Name D Holmes Organisation not applicable/not provided

Modern waste management facilities are acknowledged to be generally compatible with industrial uses. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. These sites will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the sites forward as allocations at this stage does not mean that the sites are unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I do not support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

as I have alreayd stated we should be concetrating on reducing watse not providing more facilities for irresponsible peopel to dump theirs without thought. I produce less than 1/2 a carrier bag of watse a week (not a balck bag a carrier bag) these are items that can not be recycled.If I and otehr s can do it why cant the majority.

12. Officer Response.

Comment noted. The County Council's target is to achieve at least 60% recycling and composting by 2020. This is an ambitious target that exceeds the national target of 50% over the same period. However, even with effective recycling and composting initiatives there will always be an element of 'residual' waste (i.e. the waste leftover after composting and recycling) that will need to be treated or disposed of.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No

13. Officer Response.

Noted

14. Do you have any comments on the Executive Summary?

Why do we assume land fill is the answer

14. Officer Response.

Comment noted. Landfill is not the answer. There is a pressing need to divert waste from landfill into treatment facilities where value can be recovered. This need is explained in Section 1.0 Introduction of the consultation paper. The site options consultation focuses on identifying sites suitable for residual waste treatment. This will help reduce the current reliance placed on landfill.

15. Do you have any comments on Section 1?

No

15. Officer Response.

noted

16. Do you have any comments on Section 2?

No

16. Officer Response.

noted

17. Do you have any comments on Section 3?

already stated

Number 291 Type IND Name D Holmes Organisation not applicable/not provided

17. Officer Response.

Noted

18. Do you have any comments on Section 4?

we are using the wrong solution

18. Officer Response.

Comment noted.

Number 328 Type IND Name Diane Holmes Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Most of the sites in this area would benefit from good access over motorways and main roads.

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

Sites numbered 3,4,6 and 9 in Q3 have good access. Site 7 is in the City Centre

4. Officer Response.

Comments on sites 3, 4, 6 and 9 are noted. In terms of Site 7, Land North of the Railway Triangle, the site has not been taken forward into the publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not

Number 328 Type IND Name Diane Holmes Organisation not applicable/not provided

preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

6. Please give a reason for your answer to Question 5.

The early planning and development stage of urban extension is the ideal time for consideration of incorporation of waste facilities. Attempts to 'bolt on' such facilities to existing urban areas will always create problems

6. Officer Response.

Support noted. The integration of waste management facilities into the urban extensions would allow waste from these developments and the wider Gloucester and Cheltenham area to be treated close to source in line with national and regional policy. However, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the intention of Government to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

waste collected from other areas may need to be stored for consolidation and addition to other loads. This would reduce the road journeys to be made to the main site.

8. Officer Response.

Support for bulking/transfer facilities noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

I have no knowledge of these sites

10. Officer Response.

Noted.

Number 328 Type IND Name Diane Holmes Organisation not applicable/not provided

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

see my point at Q8

12. Officer Response.

See previous response.

17. Do you have any comments on Section 3?

The inclusion of site 7 (north of the railway triangle) for consideration is in direct opposition to the plans for urban regeneration recently discussed. The traffic problems in the Horton Rd area are increasing yearly. Major gridlock is created regularly at busy times. There is a major hospital, St Peter's School, a railway crossing and concerntrated residential development in the area - it simply cannot accommodate an increase in large lorry traffic

17. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. With regard to Site 7, Land North of Railway Triangle, the site has not been taken forward into the publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

18. Do you have any comments on Section 4?

In putting this site forward, Allstone Sand & Gravel have failed to take any consideration for the concerns and views of the local residents. If this proposal were to be implemented at this site the questions of vermin, pollution, traffic, safety and air quality would be of serious concern. Allstones have a history of causing problems for local residents and have shown scant regard for our concerns

Number 328 Type IND Name Diane Holmes Organisation not applicable/not provided

18. Officer Response.

See response to Q17.

Number 191 Type IND Name Tim Hopes Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Ease of access from motorway M5 and major A-roads to majority of sites

2. Officer Response.

Support for Zone C noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester	X		
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

Based on local knowledge

4. Officer Response.

Noted.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

6. Please give a reason for your answer to Question 5.

Urban extensions must consider the local disposal of waste

6. Officer Response.

Support noted. The WCS has a role to play in ensuring all new development is underpinned by appropriate waste management infrastructure (e.g. recycling facilities). The site options consultation paper however focuses on identifying a site or sites suitable for accommodating a strategic waste management facility and there has been no interest from either waste operators or the developers leading the urban extensions in providing this type of facility as part of the development. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead their waste management requirements will be addressed through the general policies and requirements of the WCS.

Number 191 Type IND Name Tim Hopes Organisation not applicable/not provided

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

In line with Equality Assessment document C. To preserve and enhance the quality of Gloucestershire's environment and to avoid undesirable environmental effects, including risks to human health and unacceptable impacts on designated landscapes / nature conservation sites. D. To reduce the environmental impacts of transporting waste by managing the majority of Gloucestershire's waste within a reasonable distance from its source of arising, and to encourage the use of sustainable means of transporting waste.

8. Officer Response.

Support for sites outside Zone C noted, however, on balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations. Reference to the objectives of the Equality Impact Assessment is noted. These objectives are taken from the WCS preferred option consultation (2008) and will be refined in preparing the Publication WCS.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney	X		
3. Land at Lydney Industrial Estate, Lydney	X		

10. Please give a reason for your answers to Question 9.

Local knowledge

10. Officer Response.

Noted.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

In line with Equality Assessment document D. To reduce the environmental impacts of transporting waste by managing the majority of Gloucestershire's waste within a reasonable distance from its source of arising, and to encourage the use of sustainable means of transporting waste.

12. Officer Response.

Support noted. See previous response to Question 8.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

no

13. Officer Response.

Noted.

Number 191 Type IND Name Tim Hopes Organisation not applicable/not provided

14. Do you have any comments on the Executive Summary?

no

14. Officer Response.

Noted.

15. Do you have any comments on Section 1?

no

15. Officer Response.

Noted.

16. Do you have any comments on Section 2?

Disagree with assessment for SA Obj. 19 (impacts of lorry traffic) for large facility (both thermal and non-thermal treatments) - assessment shown as "no effect likely -/++" . Should be marked as "Significant negative effect likely for all sites as moving all waste to a single large facility is contrary to the Equality Assessment document guideline D. To reduce the environmental impacts of transporting waste by managing the majority of Gloucestershire's waste within a reasonable distance from its source of arising, and to encourage the use of sustainable means of transporting waste.

16. Officer Response.

Comments noted. For SA Objective 19, the sites for which the score -/++ is given are Site 3. Easter Park, Site 4. Javelin Park and Site 6. Land at Moreton Valence. Explanations for this score are given for each of these sites in the SA Reports against SA Objective 19. The respondent is incorrect in stating that the symbol -/++ means no effect likely. This actually means a mixed effect. The first score relates to the potential of the site to utilise sustainable transport, the second relates to the proximity of the site to the Strategic Highway Network - as per the initial assessment of Gloucestershire Highways. SA Objective 19 and Equality Impact Assessment (EqIA) Strategic Objective D do not conflict; rather they aim at the same thing. Moving waste to a single centralised facility could potentially score quite well against SA19 and accord with the EqIA. Importantly most of Gloucestershire's waste is generated at Gloucester and Cheltenham - hence the proposed focus on Zone C.

17. Do you have any comments on Section 3?

Should follow guidelines from Equality Assessment document C. To preserve and enhance the quality of Gloucestershire's environment and to avoid undesirable environmental effects, including risks to human health and unacceptable impacts on designated landscapes / nature conservation sites. D. To reduce the environmental impacts of transporting waste by managing the majority of Gloucestershire's waste within a reasonable distance from its source of arising, and to encourage the use of sustainable means of transporting waste. E. To co-locate similar or related facilities on existing waste sites or previously developed sites in preference to undesignated Greenfield locations (where appropriate) and to safeguard such land from development that may prevent this use.

17. Officer Response.

Comment noted. The 'guidelines' referred to are in fact the strategic objectives set out in the WCS 'preferred options' consultation published in 2008. These objectives have been refined and form the basis of the spatial strategy set out in the Publication WCS including the strategic site allocations identified.

18. Do you have any comments on Section 4?

A large scale incinerator on a single site covering the whole of Gloucestershire is inappropriate and is against the guidelines from Equality Assessment document D. To reduce the environmental impacts of transporting waste by managing the majority of Gloucestershire's waste within a reasonable distance from its source of arising, and to encourage the use of sustainable means of transporting waste

18. Officer Response.

Comment noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of

Number 191 Type IND Name Tim Hopes Organisation not applicable/not provided

different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. Importantly, the type of technology chosen has no direct bearing on the delivery and implementation element of the WCS (the principles of which will apply regardless of which technology or technologies come forward).

19. Do you have any comments on the Sustainability Appraisal reports?

Disagree with assessment for SA Obj. 19 (impacts of lorry traffic) for large facility (both thermal and non-thermal treatments) - assessment shown as "no effect likely -/++" . Should be marked as "Significant negative effect likely for all sites as moving all waste to a single large facility is contrary to the Equality Assessment document guideline D. To reduce the environmental impacts of transporting waste by managing the majority of Gloucestershire's waste within a reasonable distance from its source of arising, and to encourage the use of sustainable means of transporting waste.

19. Officer Response.

Comments noted. For SA Objective 19, the sites for which the score -/++ is given are Site 3. Easter Park, Site 4. Javelin Park and Site 6. Land at Moreton Valence. Explanations for this score are given for each of these sites in the SA Reports against SA Objective 19. The respondent is incorrect in stating that the symbol -/++ means no effect likely. This actually means a mixed effect. The first score relates to the potential of the site to utilise sustainable transport, the second relates to the proximity of the site to the Strategic Highway Network - as per the initial assessment of Gloucestershire Highways. SA Objective 19 and Equality Impact Assessment (EqIA) Strategic Objective D do not conflict; rather they aim at the same thing. Moving waste to a single centralised facility could potentially score quite well against SA19 and accord with the EqIA. Importantly most of Gloucestershire's waste is generated at Gloucester and Cheltenham - hence the proposed focus on Zone C.

20. Do you have any comments on the Habitat Regulations report?

The "Likely Significant Effect." on a numer of habitats but specifically on the Cotwolds Beechwoods from "a generic thermal treatment facility" should rule out Large and Medium thermal facilities in Zone C - without the Beechwoods we don't have the Cotswolds.

20. Officer Response.

Comment noted. This issue will be tested through detailed HRA/AA modelling to be undertaken in support of the Publication WCS prior to submission to the Secretary of State.

Number 370 Type IND Name Julian Hopkins Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I write to object to the use of all 13 of the sites listed for possible waste treatment in Gloucestershire on the grounds that: - Any of these sites could be used for incineration, which I oppose. - Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. - I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. - The long term costs to the taxpayer will be higher with incineration. - Incinerators act as a disincentive to reduce, reuse and recycle. - The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas. - Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. - Large incinerators in other areas of the country are already deemed to be a mistake.

17. Officer Response.

With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 455 Type MP Name Martin Horwood MP Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	

4. Please give a reason for your answers to Question 3.

I have been approached to oppose the siting of new waste disposal facilities - incinerators or not -at the land near Stoke Orchard which is currently used by the Clay Shooting Club, which includes members who are constituents of mine. The Club are very concerned at the apparent lack of attention in the consultation paid to their club, their current usage of the land or their prospects for relocation. Clay shooting is a very enjoyable sport, involves no harm to animals and has the potential to attract many young people to a healthy outdoor pursuit. It also forms part of a wider shooting community, important to the countryside economy which I'm sure you would want to encourage.

4. Officer Response.

Comments noted. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the inclusion criteria for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC Council with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that this site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 287 Type IND Name Lucy Howard Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I am writing to object to the inclusion of the areas proposed on the Wingmoor sites in the Glos Waste Core Strategy. I feel that Wingmoor Farm already processes more than an equitable share of Gloucestershire's waste operations. Driving in all of Gloucestershire's residual waste into a massive, centralised site is environmentally irresponsible as it should be processed near its source. I visited the Wing moor Farm site earlier this year, and I also attended the County Council information roadshow in Bishop's Cleeve this week. Though the roadshow presented a range of technology options that might be used at the sites, there was no indication which one would be chosen! For this reason I feel it is not possible to say whether the Wing moor sites would be suitable. I am particularly concerned that the incinerator option might be chosen, which would add yet more toxic waste to the burden of Air Pollution Control Residues already being shipped in from around the country to the Grundons site. The nearby road access is narrow and dangerous with lorries thundering down it. The impact of the huge, noisy and dirt-producing waste sites building on the beautiful pastoral landscape around our village cannot be underestimated. It is also a significant cause of stress for local residents who are genuinely concerned about the health effects of having this huge waste site so close to the schools and homes of Bishops Cleeve. There are inches of dust upon the surrounding roads and houses. The cumulative consequences of continued exposure to this dust are as yet unknown, yet there is already an unusually high level of childhood asthma in the adjacent area.

17. Officer Response.

Comments noted. The re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community. The council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. With regard to health, PPS10, states that 'modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health'. Furthermore, the detailed consideration of a waste process and the implications, if any, for human health is the responsibility of the pollution control authorities. PPS10 also states that, 'where concerns about health are raised, waste planning authorities should avoid carrying out their own detailed assessments rather they should ensure, through drawing from Government advice and research and consultation with the relevant health authorities and agencies, that they have any advice on implications for health.' The WPA duly sought the advice from the PCT/NHS through the site options consultation. Dust, along with issues such as noise and odour is a matter that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any 'sensitive receptors'. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning conditions.

Number 456 Type PC Name David Howard Organisation Oxenton Parish Meeting

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

For all the reasons outlined on Page 7 of the *'Waste Core Strategy Site Options Consultation Document. Further, even if the RSS is abandoned there is an imperative to put in place a robust Waste Strategy. The use of Zone C, to the exclusion of more peripheral sites, should help to concentrate the effort for a 'residual waste solution etc.,' and the 'mind-set' of those immediately responsible...

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch		X	
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester		X	X
8. Nastend Farm, Stroudwater Business Park	X		
9. Netheridge Sewage Treatment Works		X	
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

This question is not adequately framed: there should be an additional column between 'Suitable' and 'Not Suitable' noting 'Partial/Potential Use'. As outlined in the Document* some sites identified as potential 'Strategic Sites' may in fact have a partial or reserve use for dealing with Residual/Commercial Waste. (those marked 'don't know' are potential/partial/reserve use) 1. & 2. Both sites already heavily used for a variety of waste management facilities further use for Residual Waste [MSW] and potential Commercial/Industrial Waste [C&I] would constitute 'overload'; the sites are too close to expanding residential areas [Bishops Cleeve, Stoke Orchard, Elmstone Hardwicke]; the serving roads are already congested - no mention has been made of the 'bottleneck' at the railway bridge; other serious omissions currently concerning Wingmoor Farm East are its use for hazardous waste, 'waste' from other regions [Wales and 'fly ash' from other Counties] and the mining oflias clay - all contributing to current over-use of this particular site. 3. Too close to industrial and residential properties; the serving main road is already heavily congested. 4. Deemed to be the best strategic site; flat; requires little site adjustment for MSW [and C&I] use; well served by road access; away from residential areas [providing there is future curtailment of encroaching urban development south of Gloucester]; attractive for a nominated Contractor; best satisfies all the parameters required for Zone C - Page 7 *Document. 5. A good potential reserve site for MSW and C&I; advantages similar to those of 4. but a little too close to housing and industrial premises . 6. A potential reserve site for MSW; already being used for Commercial Waste; a waste Contractor [Smiths] is involved; a flat site away from residential development but better provision would have to be made for road access - a connection with the M5 is not practical. 7. Not really a suitable site, but is considered only for reserve use as there is a 'waste transfer' facility already in place. Site would require a disproportional amount of work to ensure that it was suitable for more waste management; residential development unacceptably close; road situation chaotic; health hazards [for numerous reasons] to the local

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population and the proximity of a major hospital unsatisfactory. 8. Has potential use only. Although in the Stroud Local Plan, it is still designated a Greenfield site [what is the quality of the farmland?]; the road situation is very poor; too close to industrial/commercial premises; site too far from the main 'generators' of waste in Gloucestershire when considering that there are more suitable areas closer to the main urban conurbations. 9. A most unsuitable site; a high risk of flooding; poor serving roadways already congested; too close to Gloucester residential and commercial areas; expense in relocating the sewage works plus attendant pipework. 10. Not a reasonable site for the reasons outlined when considering 1.& 2.

4. Officer Response.

Comments on Sites 1 and 2 noted. The use of existing waste management facilities is consistent with national policy however, regard must be had to the cumulative effect of previous waste disposal facilities on the care and well being of the local community including any significant adverse impacts on environmental quality, social cohesion and inclusion or economic potential. In terms of proximity to residential areas, clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements.With regard to access, any strategic site allocation made in the publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. The consultation does not relate to the hazardous landfill. Comments on Site 3 noted. Since the site options consultation was undertaken in October 2009 and following discussions with the landowner it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. For this reason, it has been decided that this site will not be taken forward into the publication WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS national policy and any other material considerations. Support for Site 4, Javelin Park is noted. In respect of Site 5, Quadrant Business Park, since the site options consultation was undertaken in October 2009 and following discussions with the landowner it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. For this reason, it has been decided that this site will not be taken forward into the publication WCS. Support for Site 6 noted. Comments on Site 7 are noted, but since the site options consultation was undertaken in October 2009, the Waste Planning Authority has carefully considered all the issues related to this site. Whilst it is fully recognised that it does currently serve a useful function as a site primarily handling construction and demolition waste, it will not be taken forward as a strategic site allocation due to highways and access issues. The site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains

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would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations. Comments on Site 8 are noted. The Waste Planning Authority has carefully considered all the issues on this site. Since the site options consultation was undertaken in October 2009 and following discussions with the County Council as Waste Disposal Authority, there is significant uncertainty over the prospect of delivering a strategic waste management facility on this site. For this reason, it has been decided that this site will not be taken forward into the publication WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Comments on Site 9 are noted. The flood assessment for Netheridge indicates that there is some risk of flooding, but on a large part of the site the risk is low. The areas subject to flooding were excluded from the process, and the remaining site lies within Flood Zone 1 (low risk). Notwithstanding this, since the site options consultation was undertaken in October 2009 and following discussions with the landowner it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. For this reason, it has been decided that this site will not be taken forward into the publication WCS. Comments on Site 10 are noted, see response above to comments on Sites 1 and 2. It should be noted that by not taking the any of the sites forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

6. Please give a reason for your answer to Question 5.

The RSS for Gloucestershire is fatefully flawed. The 'predict and build' philosophy based on the Kate Barker very dubious statistics has caused serious problems in this County and contributed to the numerous delays for the RSS and will hopefully ensure its demise. However, a County formulated long term plan of sequential development of residences and industry will generate a future waste problem which has to be planned for in a Gloucestershire Waste Core Strategy [WCS]. Whilst the projection of 56,000 homes and 41,700 [where are these jobs to be created?] may be regarded with a high degree of scepticism, the amount of residual waste after maximum recycling and the increased commercial/industrial waste requires the location of a number of reserve/potential semi-strategic sites to be decided upon at an early stage, besides the dedicated strategic sites.

6. Officer Response.

Comment noted. The potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I do not support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

Please refer to the answer to Q2. We are of the opinion that careful consideration of the sites in Zone C should provide enough flexibility to accommodate the

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requirements of the WCS. The reserve/potential sites noted are sufficiently large to allow for the burgeoning residual waste over 150,000 tons [plus C&I waste]. The three options identified outside Zone C appear to be somewhat isolated with their own peculiar problems. The only site with any credibility would be 2a Hurst Farm, Lydney - is it reasonable or cost effective to use such a large site for' ... small waste management ... '?

8. Officer Response.

Comments noted. A total of 13 sites were identified from an initial long-list of 329 sites. 10 of these were in Zone C, 3 were outside. All sites are suitable when considered against the relevant criteria (size, location, flood risk, highways, availability etc.). Whilst the Council's preferred strategy is to provide strategic waste management facilities within Zone C, there is likely to be a role for sites outside this area e.g. smaller scale provision or supporting infrastructure e.g. waste transfer. Not all of the sites will necessarily need to be used for waste. Modern waste management facilities can co-exist with other forms of development including employment uses and even residential. On balance having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the publication Waste Core Strategy (WCS). It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the Waste Core Strategy (WCS) national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester		X	
2. Hurst Farm, Lydney		X	
3. Land at Lydney Industrial Estate, Lydney		X	

10. Please give a reason for your answers to Question 9.

The Question has been answered in the text in Q8 and partially in the Q2 answer.

10. Officer Response.

See previous response.

12. Please give a reason for your answer to Question 11.

We support the approach of using a combination of sites with Zone C only. This answer may involve some repetition of what has been stated previously. To give a more meaningful opinion, it would have been helpful at this stage if an indication had been forthcoming as to what methodology the WCS had in mind for the ultimate disposal of the residual waste - plus C&I waste - [MBT, ATT, Autoclaving, Energy from Waste - Incineration etc ...?] so that the merits of each site - weighing the advantages and disadvantages of each site - could be judged more appropriately. As stated earlier, we consider that those sites noted in Zone C will provide the relevant flexibility to allow for all the anticipated MSW and C&I until 2026 and beyond. Further, as the exact amounts are only projections, it is felt that the number of reserve/potential sites should provide the required latitude for projection variation.

12. Officer Response.

Support for combination of sites in Zone C noted. In terms of technology, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This

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approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

We have no expert knowledge of further sites within or outside Zone C that may be suitable for MSW etc ...

13. Officer Response.

Noted.

14. Do you have any comments on the Executive Summary?

Appears to be a fair summary of the current background/position to the WCS. Again, as stated above, an outline of the means of disposal of the MSW and C&I would have been welcome.

14. Officer Response.

Support noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW).The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.

15. Do you have any comments on Section 1?

Quite adequate with good illustration and the way to respond to the Document.

15. Officer Response.

Support noted.

16. Do you have any comments on Section 2?

Generally a reasonable summary but we felt that a brief expansion of the details in each section of the Waste Hierarchy would have been of value to the uninitiated. [We have already mentioned the need for an explanation of the 'final disposal' of the residual waste etc ...] May we turn to the 'Locational Criteria': three additions [elaborations] are suggested - viz a). Projected Risk Assessment on neighbouring communities. b). Projected Health Hazards on neighbouring communities [involvement of the local PCT's]. c). Geology of the site [influences on waste processes, leaching out of a site, mineral use e.g. Wingmoor Farm East lias clay etc ...] As the WCS may embrace a wider sphere and the Joint Municipal Waste Management Strategy, we would have been happier to see commentary on the influences on the nominated sites of hazardous waste and waste from areas remote from Gloucestershire. As the County [and its waste Contractors] have considerable experience in the handling of the aforementioned waste [experience attractive to others], we would view with considerable alarm (plus 'overload') the use of Gloucestershire's strategic sites as the depository of other peoples' toxic rubbish with the possibility of skewing our own well-thought-out Residual Waste/C&I plans until 2026.

16. Officer Response.

Comment noted. In terms of expanding reference to the waste hierarchy, whilst this may have been beneficial, clearly the consultation paper needed to be kept as brief as possible. The comments relating to additional locational criteria are noted. Those set out in the consultation paper are taken from PPS10. The additional issues referred to (cumulative impact and health) are also discussed in PPS10. In terms of health impact PPS10, states that 'modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health'.

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Geology is an issue more relevant to landfill than waste treatment. The consultation focuses on sites for waste treatment facilities not landfill such as Wingmoor and Hempsted. The Publication WCS will clearly set out the Council's position and proposed policy approach in respect of hazardous waste.

17. Do you have any comments on Section 3?

The position with respect to 'Site Options' is clearly stated. Whilst it is appreciated that consideration is being given mainly to residual waste and C&I waste, may we reiterate our concerns as outlined in the second paragraph of Q16, as above. Also, it may be judicious at this point to mention 'medical waste' - the latter could be germane to the 'residual waste'. We have within Gloucestershire two expending acute hospital producing greater quantities of medical waste near to 'strategic sites' ... at present such waste is sent out of the County. This topic is very emotive: ... should a portion be considered as an incremental part of residual waste or the whole be classified as hazardous waste ... (it being much cheaper for the NBS to off-load their compromised refuse locally)?

17. Officer Response.

Comment noted. As stated the consultation focused on site options for municipal and possibly also commercial and industrial waste which is very similar in composition. It does not address the issue of hazardous waste. The publication WCS will set out the Council's position in relation to hazardous waste provision. It will also set out the approach towards 'specialist' wastes including medical waste.

18. Do you have any comments on Section 4?

We find that this part of the Document is unduly bureaucratic and long-winded: a little brevity would not come amiss. Should the planning process become excessively drawn-out we feel that enterprising and informed Contractors may withdraw. There has been much consultation already - is there a case for planning fast-tracking and a concertinaed time-scale?

18. Officer Response.

Comments noted. The WCS is required to address the issue of deliverability -indeed it is one of the key 'tests of soundness' that will be used by the Planning Inspectorate in assessing the WCS. It is therefore imperative that the WCS includes some sort of framework setting out how policies and proposals will be delivered in practical terms so that if they are failing to deliver or having unintended consequences, appropriate action can be taken e.g. policy revised or replaced. The timetables provided in Appendix 4 are based on the current 'milestones' for the residual waste project. In terms of consultation, the WCS has already been subjected to 'issues and options' consultation in 2006 and 'preferred options' consultation in 2008 in line with Government advice. The recent site options consultation (2009) was undertaken as a result of the decision to include strategic site allocations within the WCS. The WCS should be adopted by late 2011.

19. Do you have any comments on the Sustainability Appraisal reports?

Sustainability Appraisal Report not seen. We shall assume that a full and comprehensive Sustainability Appraisal is undertaken on all nominated strategic sites and reserve sites.

19. Officer Response.

The SA Reports were available with all the other consultation documents on the Council's website, at all District Council Offices and local libraries and on request. An executive summary report was produced alongside the main report for ease of reference. All sites were duly assessed through this process.

20. Do you have any comments on the Habitat Regulations report?

Habitat Regulations Assessment Screening Report not seen.

20. Officer Response.

Noted.

Number 323 Type IND Name EJ and PA Howell Organisation not applicable/not provided

17. Do you have any comments on Section 3?

Would like to voice my opinion as the Stoke Orchard shooting site being put forward as a waste disposal site. The club has worked hard to maintain a high standard of conservation around the shooting ground, planting trees and landscaping the area and the club is well supported by a great number of people who have worked hard to achieve a great sporting club. I believe other sites in the area far more suited, they can be accessed far more easily and with a greater degree of safety regarding large lorries etc. There are numerous sites of waste and landfill in Bishop's Cleeve and Stoke area supporting the Gloucestershire scheme so we really feel that Wingmoor Farm area would appreciate being left to accommodate the local shooting club which will guarantee to tend and preserve it very carefully.

17. Officer Response.

Comments noted. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the inclusion criteria for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that this site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 366 Type IND Name John Hubert Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I am writing because I am a long standing member of the Cheltenham and District Clays Club (clay pigeon shooting) and our ground at The Park, Stoke Orchard, near Bishops Cleeve has recently come under threat. The threat arises because the council wish to extend existing waste disposal activities under the 'Waste Core Strategy' (WCS) Plan. This is located on Area C at Wingmoor Farm West, Tewkesbury Borough. This site presently provides a very useful local sports amenity that is popular and has been built up by the club members over a period of many years to its present condition. It is now a thriving club with an active local membership and keeps the grounds well maintained and has planted over 400 trees in the area. The site is particularly well suited since it is away from houses and residential areas. It would be difficult to find another area as well suited. For future waste disposal, Wingmoor Farm presently has the local waste disposal site. This is well run, but already carries large traffic volumes at busy times and access from all directions is by small and twisty roads. The present use as a domestic waste with people able to visit in private cars can be handled by these roads, but an increase in use by heavy vehicles and lorries would be most unsuitable, since the access from the major roads is inadequate. I trust that these views will be taken into consideration and that the council will find a more suitable site for the WCS site.

17. Officer Response.

Comments noted. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the inclusion criteria for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from TBC and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that this site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 1837 Type BUS Name David Hunter Organisation Wales and West Utilities

4. Please give a reason for your answers to Question 3.

You will note the presence of our high pressure gas main(s) in proximity to your site. No excavations are to take place above or within 10m of the confirmed position of these mains without prior consultation with Wales and West Utilities. We enclose an extract from our mains records covered by your proposals. This plan shows only those pipes owned by Wales and West Utilities in its role as Licensed Gas Transporter (GT). Gas pipes owned by other GTs and also privately owned maybe present in this area. Information with regard such pipes should be obtained from the owners. The information shown on this plan is given without obligation, or warranty, the accuracy thereof cannot be guaranteed, No liability of any kind whatsoever is accepted by Wales and West Utilities, its agents or servants for any error or omission. The Wales and West Utilities High Pressure Network maybe affected by your proposal and a copy of the information you have provided has been forwarded to Work Definition for their comment. They will contact you as necessary.

4. Officer Response.

This is information an applicant has to consider if a planning application is submitted.

Number 281 Type PC Name L Ireland Organisation Frampton On Severn Parish

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

The area is appropriate in view of the transport constraints within the county

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X		X
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester	X		
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West			

4. Please give a reason for your answers to Question 3.

The sites are either already in use for waste handling or appropriately connected to transport networks

4. Officer Response.

Support noted. The re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

6. Please give a reason for your answer to Question 5.

This response depends upon the precise areas which are developed. Once again the essential is that any waste handling site should be linked effectively to road/rail/water transport

6. Officer Response.

Comment noted. Potential transport modes would depend on which, if any of the urban extensions were to come forward. At the present time this is uncertain. Significantly, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the Government's intention to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead,

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their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I'm not sure/I don't know

8. Please give a reason for your answer to Question 7.

It seems at first sight sensible to make contingency plans but if they exist this may deter more effective waste minimisation strategies

8. Officer Response.

Comment noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations. There is no evidence to suggest that waste facilities, particularly those that are serving local needs, acts as a deterrent to waste minimisation.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

We are not sufficiently familiar with the road layout in the area

10. Officer Response.

Comment noted.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I do not support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

We think facilities should be concentrated in Zone C

12. Officer Response.

Support for Zone C noted.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No

13. Officer Response.

Noted

14. Do you have any comments on the Executive Summary?

This is a reasonable summary of the problem and possible responses

14. Officer Response.

Number 281 Type PC Name L Ireland Organisation Frampton On Severn Parish

Support noted.

15. Do you have any comments on Section 1?

No

15. Officer Response.

noted

16. Do you have any comments on Section 2?

No

16. Officer Response.

noted

17. Do you have any comments on Section 3?

No

17. Officer Response.

Noted

18. Do you have any comments on Section 4?

No

18. Officer Response.

Noted

19. Do you have any comments on the Sustainability Appraisal reports?

no

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

no

20. Officer Response.

Noted.

Number 237 Type IND Name Beverley Jackson Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Close proximity to housing and more so food businesses !! Namely little chef restaurant and Wild bean cafe.

2. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategywhich states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch		X	
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

only know the ashcurch site which is NOT at all suited

4. Officer Response.

Comment noted. Easter Park is located within Zone C and therefore consistent with national and regional policy. The site enjoys good access, comprises previously developed land and is not located within the floodplain. There are no biodiversity/ecological interests and the landscape assessment carried out considered the site highly suitable in landscape terms. Although there is housing to the north, this is separated by existing employment uses. Notwithstanding the above, the site has not been taken forward into the Publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity

Number 237 Type IND Name Beverley Jackson Organisation not applicable/not provided

requirements to 2027). It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

6. Please give a reason for your answer to Question 5.

more housing = more needs and can be better placed within development instead of being squeezed into a already developed unsuitable area.

6. Officer Response.

Support noted. The early inclusion of waste treatment facilities into the design and layout of the urban extensions would allow for them to be well-integrated. They would also present the opportunity to provide locally generated heat and power within the development. Significantly however, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the Government's intention to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

have not seen other sites

10. Officer Response.

Noted.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I'm not sure/I don't know

12. Please give a reason for your answer to Question 11.

dont have knowlage of other sites

12. Officer Response.

Noted.

Number 451 Type PC Name Zoe Jackson Organisation Cold Aston Parish Council

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Most effort should go to waste reduction at source and in the Cotswolds we need sites with the potential to support local composting, anaerobic digestion etc. We need recycling facilities and well organised arrangements for re-use not land filling is destroying useful materials. Focus on waste managing not waste reduction in Zone C is counter to a commitment to reduce waste at source. Excess lorry journeys and risk of out of county waste coming in.

2. Officer Response.

Comment noted. The Council is actively seeking to address the issue of reducing waste at source and has adopted supplementary policy relating to waste minimisation in new development. It is also actively seeking to increase recycling and composting rates with a target of at least 60% by 2020, higher than the national target of 50% over the same period.

However, there will always be an element of leftover or 'residual' waste that requires management. The most effective way of dealing with this waste is to recover energy or value from it through appropriate treatment. In line with European, national and regional policy, the Council is striving to move away from disposal through landfill. Zone C includes Gloucester and Cheltenham which is where most of Gloucestershire's waste is generated. Treating this waste close to source will reduce the distance waste has to travel by road.

4. Please give a reason for your answers to Question 3.

Information not easy to identify regarding the sites and their suitability for technologies that support a focus on reduction. Population densities and the risk of harm make incineration and handling fly ash in appropriate on these sites. Toxic (but valuable materials such as heavy metals) should not be kept in the mass of waste.

4. Officer Response.

Comments noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.

6. Please give a reason for your answer to Question 5.

If this was really believed why not offer Cirencester, Moreton, Stow etc to have MBT and energy generation. 1 - Over building without waste minimisation in place creates waste. 2 - All settlements over 3-5,000 should have these facilities, start with existing settlements. Require Cheltenham to at least achieve what other Districts do before adding more

6. Officer Response.

Comment noted. The potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

Number 451 Type PC Name Zoe Jackson Organisation Cold Aston Parish Council

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

We support additional sites - for local capacity to handle and usefully process waste. Not just perpetuating Zone C but in their own right.

8. Officer Response.

Comment noted. Whilst the Council's preferred strategy is to provide strategic waste management facilities within Zone C, there is likely to be a role for sites outside this area e.g. smaller scale provision or supporting infrastructure e.g. waste transfer. Importantly most of Gloucestershire's waste is produced in Zone C. Treating this waste close to source is consistent with national and regional policy. On balance having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the publication Waste Core Strategy (WCS). It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the Waste Core Strategy (WCS) national policy and any other material considerations.

10. Please give a reason for your answers to Question 9.

None of the above suitable for incineration. Perhaps valid to consider technologies that are flexible to volumes and type, can produce useful products and could lead to retreival of useful materials in future not destroy them. We keep on asking, why can't Foss Cross etc be organised so the public can purchase "waste items" that still have useful life. Does anyone ever listen or respond.

10. Officer Response.

Comments noted. Please see response to Q4. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. These sites will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the sites forward as allocations at this stage does not mean that the sites are unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

We need a flexible approach, we need capacity to re-use, recycle and process within 10 -15 miles of where stuff is generated.

12. Officer Response.

Support noted. On balance having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the publication Waste Core Strategy (WCS). It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the Waste Core Strategy (WCS) national policy and any other material considerations.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

Sites for anaerobic digesters could be found on farms and in industrial estates. Home composting supported in every community

13. Officer Response.

Comments noted. The consultation is based upon the location of sites for residual waste management treatment (i.e. after recyclable and compostable elements

Number 451 Type PC Name Zoe Jackson Organisation Cold Aston Parish Council

have been removed). Whilst some processes (such as MBT) may include an element of anaerobic digestion, this treatment method would not be appropriate for certain elements of the residual waste. All sites which matched the 'inclusion criteria' outlined in Technical Evidence Paper WCS-N have been investigated according to the methods also outlined in the paper. All industrial sites within the county would have fallen within the initial 'inclusion criteria' identified in Technical Evidence Paper WCS-N. The inclusion criteria did not include farm buildings unless they were formally identified as employment land in a local plan or district employment land review. Criteria based policy within the WCS will allow for small-scale speculative waste proposals to come forward.

14. Do you have any comments on the Executive Summary?

Q14 - 20. These questions are not easy to answer, it seems unlikely the replies are valued. The lack of openness about the technology choices makes it hard to engage with the consultation. It does not feel real. It is confusing not having the background documents easily in one place. The avoidance of funding to waste reduction indicates poor cost control.

14. Officer Response.

Comment noted. The consultation questionnaire consisted of a series of 'quantitative' questions plus a number of more general questions to allow general comments to be made. All responses will be taken into account in preparing the publication WCS. In terms of technology, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. All consultation documents were made available as a 'package' of documents online, at all Council Offices and local libraries. The Council's approach towards waste reduction will be clearly set out in the Publication WCS.

20. Do you have any comments on the Habitat Regulations report?

We are concerned that pollution incidents and contamination baseline data are not easily accessible. Are levels of heavy metals and fire dust in homes near the fly ash tips being independently monitored - why is data not provided here? Health is of paramount importance.

20. Officer Response.

There is information about pollution incidents and health issues in Gloucestershire in the Sustainability Appraisal (SA) Scoping & Context Reports as well as the SA Reports that have been produced for each WCS consultation stage. This data is not included in the Habitats Regulations Assessment (HRA) reports as the focus is on habitat and species protection issues. Odour, noise and dust are matters that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any sensitive receptors. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning conditions. With regard to pollution it should be noted that planning and pollution control regimes are separate but complimentary. Pollution control is concerned with preventing pollution whilst planning controls the development and use of land. Waste planning authorities are expected to work on the assumption that the relevant pollution control regime will be properly applied and enforced. PPS10, states that modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health. Furthermore, the detailed consideration of a waste process and the implications, if any, for human health is the responsibility of the pollution control authorities. PPS10 also states that, where concerns about health are raised, waste planning authorities should avoid carrying out their own detailed assessments.rather they should ensure, through drawing from Government advice and research and consultation with the relevant health

Number 451 Type PC Name Zoe Jackson Organisation Cold Aston Parish Council

authorities and agencies, that they have any advice on implications for health. The WPA duly sought the advice from the PCT/NHS through the site options consultation.

Number 110 Type IND Name Matt James Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I am writing with regard the plans revealed for a Waste Incinerator to be built at a number of potential sites around Gloucester. I strongly object to the current proposals as Waste Incinerators are not environmentally friendly, are an 'easy option' in comparison to other options and create an eyesore in an urban area. The proposed sites around Gloucester City Centre are highly unsuitable due to the mass population living in close proximity. Gloucester is finally seeing a light at the end of a tunnel with urban regeneration and the construction of an incinerator would be a huge set back from an environmental and pollution point of view. I therefore strongly urge you to reconsider the construction of a Waste Incinerator in Gloucester and confirm I do not support the initiative. I would recommend and support more effort being made into recycling to improve the current mediocre facilities and roadside collection facilities.

17. Officer Response.

Comments noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. With regard to thermal treatment (incineration) at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10 , which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. In terms of a facility being an 'eyesore' all sites have been subjected to an initial landscape assessment with some sites identified as being more suitable than others. Any detailed proposal would need to be supported by robust justification in design terms such as a design and access statement. In terms of recycling, the Council is already doing a great deal to achieve more waste reduction, re-use and recycling however there will always be a leftover element of 'residual' waste that cannot be recycled or composted and must be managed through appropriate forms of waste treatment in order to divert it from landfill.

Number 158 Type IND Name Chris James Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I dont mind where the site(s) is situated, but I firmly believe that incineration is the way forward to destroy waste in the future.

17. Officer Response.

Comment noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.

Number 349 Type IND Name Mark James Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

many of these sites are within builtup areas within the county &therefore totally unsuitable

2. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch		X	
4. Javelin Park, Haresfield		X	
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park	X		
9. Netheridge Sewage Treatment Works		X	
10. The Park, Wingmoor Farm West			

4. Please give a reason for your answers to Question 3.

outside of the towns not so likley to cause traffic hold ups

4. Officer Response.

Comment noted. Urban areas are not necessarily unsuitable and they are closer to where the majority of the County's waste is produced. See previous response.

Number 372 Type BUS Name Sue Janota Organisation South East England

17. Do you have any comments on Section 3?

The South East England Partnership Board as the Regional Planning body has no substantive comments to make relating to this document.

17. Officer Response.

Noted.

Number 123 Type IND Name Alec Jeakins Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Two main reasons, Zone C is where the main content of population in the county live, good transport links both to the finally chosen site but also for waste transfer facilities.

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X		
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre	X		
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park	X		
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West			

4. Please give a reason for your answers to Question 3.

7 - If all movements on and offsite were by rail then this site would be 'suitable' 1,2,3,& 10 - All these are next to or close to the railway, consideration to using rail for movements on and off these sites should be given a lot of thought. All these sites would be suitable particularly if the idea of splitting final processing over a number of locations rather that just one site and the chosen route.

4. Officer Response.

Comments noted. At a number of the sites, the potential exists for the movement of waste by rail however this would need to be explored in more detail in terms of the potential logistics (cost and effect on passenger services and other movements). Using alternatives to road transport would be consistent with Government policy. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by a further highway assessment with any necessary mitigation (e.g. junction improvements) or access requirements (e.g. rail link) clearly identified as site-specific requirements. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan which would also explore the possibility of movement of waste by means other than road transport. In terms of the number of sites, the site options consultation identifies 13 sites, 10 within Zone C and 3 outside. The questionnaire invited views on the relative merits of these sites as well as the relative merits of using a combination of different sites. At this stage it is not known whether residual municipal waste in Gloucestershire will be managed at one site or several sites. The council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single

Number 123 Type IND Name Alec Jeakins Organisation not applicable/not provided

site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the county.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

6. Please give a reason for your answer to Question 5.

With modern systems there is no problem

6. Officer Response.

Support noted. The WCS has a role to play in ensuring all new development is underpinned by appropriate waste management infrastructure (e.g. recycling facilities). The site options consultation paper however focuses on identifying a site or sites suitable for accommodating a strategic waste management facility and there has been no interest from either waste operators or the developers leading the urban extensions in providing this type of facility as part of the development. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

All options need to be kept open

8. Officer Response.

Support noted, however, on balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

1 - Concerned that site is over major high aquifer 2 - Problems with housing allocation 3 - Concerned over flooding problem All 3 sites are suitable for minor treatment and / or treatment.

10. Officer Response.

Comments noted. In respect of Site 1a it is acknowledged that the major high aquifer is a significant consideration. The Environment Agency (EA) is the statutory body responsible for advising on such issues. They have submitted detailed comments to the site options consultation including in relation to this issue. Having

Number 123 Type IND Name Alec Jeakins Organisation not applicable/not provided

regard to forecast capacity requirements (i.e. the number of sites needed) and the need to manage waste close to source in line with national policy, it has been decided not to allocate any strategic sites outside the area referred to as Zone C (the central area of Gloucestershire). As this site is outside Zone C it is not being taken forward. Also, the lack of waste industry interest in response to this site through the site options consultation (2009) raises question marks over the deliverability of the site for waste management purposes. Furthermore, the Environment Agency (EA) has raised concerns in response to this site in relation to groundwater issues. Site 2a Hurst Farm is allocated for employment use, not mixed-use development as originally thought. Modern waste management uses are generally acknowledged to be compatible with employment uses. It is acknowledged that flood risk is a consideration for Site 3a. Any proposal would need to be supported by a detailed site-specific Flood Risk Assessment (FRA) with any necessary mitigation identified as appropriate. Notwithstanding the above, having regard to forecast capacity requirements (i.e. the number of sites needed) and the need to manage waste close to source in line with national policy, it has been decided not to allocate any strategic sites outside the area referred to as Zone C (the central area of Gloucestershire). As this site is outside Zone C it is not being taken forward. Also, the lack of waste industry interest in response to this site through the site options consultation (2009) raises question marks over the deliverability of the site for waste management purposes. Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

Flexibility is the key, keep an open mind

12. Officer Response.

Support noted.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No

13. Officer Response.

Noted

14. Do you have any comments on the Executive Summary?

My comments are based on a visit to the road show at Quedgeley and documents I collected there, plus very interesting discussions with 3 members of GCC staff at the road shows.

14. Officer Response.

Comment noted.

15. Do you have any comments on Section 1?

None

15. Officer Response.

noted

16. Do you have any comments on Section 2?

Number 123 Type IND Name Alec Jeakins Organisation not applicable/not provided

None

16. Officer Response.

noted

17. Do you have any comments on Section 3?

None

17. Officer Response.

noted

18. Do you have any comments on Section 4?

None

18. Officer Response.

Noted

19. Do you have any comments on the Sustainability Appraisal reports?

I only read the summaries but presume there are systems of checking to ensure the scores are compiled in an objective way.

19. Officer Response.

Comment noted. The SA is based on reliable and up-to-date evidence but it is not a scientific assessment, informed value judgements are required. The Council's approach to SA does not utilise a numeric scoring system where scores are added up to find e.g. the best site or the best policy. However, it does highlight significant sustainability effects and is a very useful guide for the next stages of plan making and for decision makers. The publication WCS is accompanied by a final SA report.

20. Do you have any comments on the Habitat Regulations report?

None

20. Officer Response.

Noted.

Number 72 Type IND Name S M Jenning Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

I write re: the proposals of the waste core strategy and the Wingmoor Sites, to which I object. Wingmoor is already one of the most toxic waste sites in Europe. Any further development would lead to even worse problems for Bishops Cleeve. I understand decisions have not yet been made about which technology would be used but any at Wingmoor would have an impact on the village and its residents. Incineration would be particularly bad because of hazardous residues and the potential future harm to health, especially for children.

4. Officer Response.

Comments noted. Whilst there is a hazardous landfill site at Wingmoor Farm East, operated by Grundons, the site is managed in accordance with the planning permission conditions and other various requirements enforced by the Environment Agency. Importantly this consultation does not relate to the hazardous waste landfill it relates to other parcels of land owned by Grundons within the Wingmoor Farm East site that may be suitable for the development of a waste treatment facility. The re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community. Importantly, no decision has been made on technology. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.

Number 404 Type IND Name Ray Jennings Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

I don't see the merit of limiting the search to a specific zone.

2. Officer Response.

Comment noted. It is essential that the WCS provides a clear strategy for the location of new waste management facilities. The designation of Zone C is consistent with national and regional policy and reflects the fact that most of Gloucestershire's waste is produced at Gloucester and Cheltenham. Identifying remote sites some distance from Gloucester and Cheltenham would be contrary to national and regional policy which requires waste to be treated close to source with most waste arising in Gloucester and Cheltenham.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

Wingmoor already takes more than its fair share of the county's waste. Apart from the congestions in the area the prevailing wind will take any dust or toxic material over Bishop's Cleeve, Woodmancote and Gotherington. The waste could include industrial and commercial waste and the technologies to be used are not specified.

4. Officer Response.

Comments noted. The re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community. In terms of congestion, PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. For the Wingmoor Farm sites the assessment identified a likely net increase in traffic and the need for potential capacity improvements in certain locations near the sites. Any strategic site allocation made in the publication WCS will be supported by development criteria including those relating to highways and transport. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. Dust is a detailed matter along with issues such as noise and odour that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any 'sensitive receptors'. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can

Number 404 Type IND Name Ray Jennings Organisation not applicable/not provided

often be satisfactorily ameliorated through the use of appropriate planning conditions. In terms of 'toxic material', PPS10, states that 'modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health'. Furthermore, the detailed consideration of a waste process and the implications, if any, for human health is the responsibility of the pollution control authorities. PPS10 also states that, where concerns about health are raised, waste planning authorities should avoid carrying out their own detailed assessments rather they should ensure, through drawing from Government advice and research and consultation with the relevant health authorities and agencies, that they have any advice on implications for health.' The WPA duly sought the advice from the PCT/NHS through the site options consultation. With regards to commercial and industrial waste, whilst the focus of the site options consultation was on municipal (mainly household) waste the document does acknowledge for a number of sites the potential to treat commercial and industrial waste also (which is very similar in composition). It is important to note that household waste is only 25% of the total waste produced by Gloucestershire. In terms of technology, at the present time the Council is technology 'neutral'. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

Don't limit search to Zone C

8. Officer Response.

On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No but the whole County should be considered

Number 404 Type IND Name Ray Jennings Organisation not applicable/not provided

13. Officer Response.

All sites within the county which met the initial 'inclusion criteria' outlined in Technical Evidence Paper WCS-N were considered. Please refer to Section 2 and Appendix A of Technical Evidence Paper WCS-N. Although there may be sites available in more isolated locations away from populated areas, locating strategic waste management facilities in these areas would be contrary to policy laid out in PPS10 and the Regional Waste Strategy which require waste to be treated close to source in accordance with the 'proximity principle'.

14. Do you have any comments on the Executive Summary?

No

14. Officer Response.

Noted.

15. Do you have any comments on Section 1?

No

15. Officer Response.

Noted.

16. Do you have any comments on Section 2?

No

16. Officer Response.

Noted.

17. Do you have any comments on Section 3?

As indicated

17. Officer Response.

See previous responses.

18. Do you have any comments on Section 4?

No

18. Officer Response.

Noted.

19. Do you have any comments on the Sustainability Appraisal reports?

No

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

No

20. Officer Response.

Noted.

Number 274 Type IND Name R J Johnson Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I am writing this letter rather than fill in your questionnaire because the latter does not fit what I have to say and because many questions asked are outside my knowledge. As a consequence of attending your Road Show in Bishops Cleeve, I was driven to search the internet for more information on Waste Management. The websites I have visited were yours, Grundon's, Wikipedia and links from the latter, which I found most informative if disturbing. In particular it seems to me that you are putting the cart before the horse in asking us to comment on the choice of site before telling us what technology you propose using on each site. The one technology which stood out from my research as the most risky was incineration, which has a history of dangerous discharges, such as dioxins. I am aware that Grundon use Wingmoor because it has a large deposit of blue lias clay which is fairly impervious and is judged suitable for holding hazardous material such as clinical or radio active waste and toxic fly ash from incinerators. I know that it takes fly ash from Grundon's incinerator at Colnbrook near Heathrow. The Road Show told me that ofthe 5 technologies being considered for the future all but one produced fly ash for landfill. Where would this fly ash go, irrespective of the location of the source of the fly ash? At the present time, obviously only Wingmoor is suitable, so Bishops Cleeve will have to continue to suffer from the nearness of this hazardous tip, whatever the outcome of your consultation. This is presumably why 7 of the 13 possible sites for new plant are at Wingmoor so that transport of fly ash would be minimised but transport of the raw material and its effects on Bishops Cleeve would increase further. Your failure to make this point clear at the Road Show angers me. We in Bishops Cleeve and Woodmancote are fed up with having had to cope with the dangers of the traffic to and from the Wingmoor sites for many years. I have personal experience of this traffic and of the odours from the sites as I cycle past them several times each week. I do not support the choice of Wingmoor for the siting of further waste disposal facilities. Bishops Cleeve has suffered enough over the years, it is so unfair. I cannot comment on the other proposed sites as I do not know enough about them, but may I make the suggestion that you look into whether there are other suitable deposits of blue lias clay that would form the basis of a site to replace Wingmoor away from residential areas. I understand that a bed of such clay does indeed lie under most of the Severn valley.

17. Officer Response.

Comments noted. Dealing with each in turn. The Council is currently technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. With regard to health impact, PPS10, states that 'modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health'. Notwithstanding the current position on technology if a thermal treatment facility (incinerator) were to be developed there would be some material that would need to be managed at a specialist facility. The existing Grundons operation at Wingmoor Farm East is one such facility and is the subject of a current planning application to extend the operation beyond 2009. The application although of relevance, is outside the scope of the WCS and the site options consultation. The presence of the Grundons facility is however not the reason why seven sites were identified at Wingmoor Farm East and West in the site options consultation. As explained in the paper, these sites were included for a number of reasons including location, flood risk, highways, availability and so on. Furthermore, the re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community. With regard to traffic, PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. For the Wingmoor sites, the assessment identified a potential net increase in traffic and the need for mitigation in certain locations to help increase capacity. Any strategic site allocation made in the publication WCS will be supported by development criteria including transport and highways. Should a planning

Number 274 Type IND Name R J Johnson Organisation not applicable/not provided

application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan.

Number 124 Type CCLLR Name Ceri Jones Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

I believe that waste should be dealt with as near as possible to its place of origin. Consequently, I do not believe that all facilities should be concentrated in one area. More local solution, even within the AONB, would be acceptable if housed in buildings which did not conflict with the immediate environment. I also think that it is vital that the waste should be processed on a number of smaller sites than on one large site because the disamenity is appalling for nearby residents.

2. Officer Response.

Comment noted. It is essential that the WCS presents a clear spatial strategy concerning what will be built and where. The designation of Zone C is consistent with national and regional policy and includes Gloucester and Cheltenham, the two main sources of waste in the County, allowing this waste to be treated close to source. In terms of a network of small, local facilities the site options consultation paper identifies 13 potential sites, 10 within Zone C, 3 outside Zone C. Views are invited on using a combination of different sites. The consultation makes it clear that whilst some of the sites are capable of providing a one-site solution, it may be that strategic waste management of municipal waste comes forward on several different sites. The council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the county. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. The advantages and disadvantages would be investigated further during procurement process.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

It is absolutely clear that the 3 sites at Wingmoor Farm are totally unsuitable. There is already a huge disamenity to local residents, most especially those living VERY near - including many young families on the extensive housing developments near to the A435 and Stoke Orchard Road. These people have suffered with dust, noise, flies appalling odour issues, increasing flocks of gulls - and, not least, traffic problems (noise, congestion, pollution, road safety dangers) for long enough. It is time to say 'NO MORE'. Two other factors should also be taken into account. The unwelcome existence of the hazardous waste site which creates great local anxiety, as

Number 124 Type CCLLR Name Ceri Jones Organisation not applicable/not provided

highlighted in the recent community H.IA, which is being monitored by our Health Scrutiny Committee. We should definitely make no decision on the Wingmoor site until the final report is published. How much more are Bishops Cleeve and surrounding villages expected to take? The site at WIngmoor Farm West flooded in July 2007 - and the presence of the floodgate means that this will always be a threat.

4. Officer Response.

Comments noted. Dealing with each point in turn. In terms of proximity to housing, clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. Odour, noise and dust are matters that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any 'sensitive receptors'. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning conditions. In terms of traffic, PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. In respect of the Wingmoor Farm sites it is acknowledged that due to capacity issues, enhancement (e.g. junction improvements) may be needed. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. With regard to hazardous waste, the areas of Wingmoor Farm (East and West) currently used for landfill including landfill of hazardous waste, do not form part of this consultation and the operational status of these sites is also beyond the scope of the consultation. With regard to health, PPS10, states that 'modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health'. Furthermore, the detailed consideration of a waste process and the implications, if any, for human health is the responsibility of the pollution control authorities. PPS10 also states that, where concerns about health are raised, waste planning authorities should avoid carrying out their own detailed assessments rather they should ensure, through drawing from Government advice and research and consultation with the relevant health authorities and agencies, that they have any advice on implications for health.' The WPA duly sought the advice from the PCT/NHS through the site options consultation. With regard to flood risk, the strategic flood risk assessment carried out shows that there are no significant flooding issues at Wingmoor Farm East. It also shows that although land south of Area A, Wingmoor Farm West is at risk of flooding from the River Swilgate, Area A itself and the other two parcels of land, B & C are not at risk of flooding. Notwithstanding this any proposal of more than 1 hectare in size would need to be supported by a site-specific Flood Risk Assessment (FRA) with any necessary mitigation measures identified as appropriate.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

6. Please give a reason for your answer to Question 5.

As stated in the comment at Q2, I believe that we should have a number of small facilities, but not adjacent to large housing (therefore presumably on the periphery of such unwanted developments). At this point, I would like to make it clear that I believe it is imperative that we have no incinerators at any site. Anaerobic

Number 124 Type CCLLR Name Ceri Jones Organisation not applicable/not provided

Digestion or MBT plants would be my preferred solution.

6. Officer Response.

Support noted. The WCS has a role to play in ensuring all new development is underpinned by appropriate waste management infrastructure (e.g. recycling facilities). The site options consultation paper however focuses on identifying a site or sites suitable for accommodating a strategic waste management facility and there has been no interest from either waste operators or the developers leading the urban extensions in providing this type of facility as part of the development. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead their waste management requirements will be addressed through the general policies and requirements of the WCS. In terms of technology, the Council is currently 'technology neutral'. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

Implicit from my answers already given,

8. Officer Response.

See previous responses.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney	X		
3. Land at Lydney Industrial Estate, Lydney	X		

10. Please give a reason for your answers to Question 9.

For the provision of appropriate local facilities. Could not other sites also be identified?

10. Officer Response.

Comment noted. Other sites were considered on an initial 'long-list' of 329 sites however these were subsequently excluded for various reasons including size, location, flood risk, highways and deliverability. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. These sites will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the sites forward as allocations at this stage does not mean that the sites are unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

Number 124 Type CCLLR Name Ceri Jones Organisation not applicable/not provided

Reasons as before

12. Officer Response.

See previous response.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

I am not familiar enough with the localities to suggest any other sites, but believe there must be suitable places in the Cotswolds to accommodate small facilities.

13. Officer Response.

Comment noted. Over 300 individual parcels of land in the county were originally identified as fulfilling the 'inclusion criteria' discussed in Technical Evidence paper WCS-N. After following the process discussed, over 100 of these sites (across all six districts - including the Cotswolds) had technical assessments carried out on them and the only site in the Cotswolds found to be available and potentially suitable for residual waste management treatment was the Foss Cross site, as indicated in the consultation document.

14. Do you have any comments on the Executive Summary?

I think it is a great pity that so much emphasis is put on Zone C - a strategy with which I firmly disagree.

14. Officer Response.

Comment noted. It is essential that the WCS provides a clear steer on the preferred location for new strategic waste management facilities. 'Zone C' has been identified as the preferred location for a number of reasons including the fact that it avoids the floodplain and Cotswold Area of Outstanding Natural Beauty, is consistent with Government Policy (PPS10), the Regional Waste and Spatial Strategies and reflects the fact that Gloucester and Cheltenham face major potential growth in the period up to 2026. These reasons are clearly set out in the consultation paper. Whilst the Council's preferred strategy is to provide strategic waste management facilities within Zone C, speculative proposals may come forward outside Zone C where there is market demand, subject to relevant criteria.

Number 322 Type OTH Name Adrian Jones Organisation West Glos Green Party

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Zone C is too narrow a focus for this search. The site selection methodology is flawed in that it is overly constraining. A better approach would be to develop an 'Areas of Search' methodology using constraint mapping in a GIS system and including the whole county to identify more local sites - the current approach attempts to restrict development to a narrow corridor which may not be that proximate to the fringes of the county. Such a GIS approach was used for the Wales Regional Waste Plans - have a look at their website at http://www.walesregionalwasteplans.gov.uk/south_west/regional_waste_plan_first_review.html (this is the page for SW Wales, which is probably the best laid out of the three regions - the Areas of Search Reports and Maps for SW Wales can be found here.) This approach is much more thorough than one which merely concentrates on a much smaller area such as the Gloucestershire approach - by doing this then it really isn't looking at the provision of sites for the county as a whole but just for part of it... Also, the approach suggested does not take any account of facilities outside the County. I am certainly aware of waste flows out of the County to sites in Monmouthshire and South Gloucestershire, for example - why isn't fringe capacity of this nature included?

2. Officer Response.

Comment noted. It is essential that the WCS sets out a clear spatial strategy for what will be built and where. The designation of Zone C is based on a number of factors including the fact that it includes Gloucester and Cheltenham (where most waste originates) and avoids the AONB and large areas of floodplain. Site selection has been based on a number of factors including site size, location, highways, flood risk and deliverability. Searching for sites across the entire County would be inconsistent with national and regional policy which requires waste to be treated close the main sources of arisings (i.e. Gloucester and Cheltenham). With regards to the cross-boundary movement of waste although it is acknowledged that this does occur, particularly for certain waste streams such as commercial and industrial waste, it is the Council's intention that municipal waste generated in Gloucestershire, is treated in Gloucestershire and that provision will be made through the WCS accordingly. As such it is not considered appropriate to consider sites outside the County.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X		
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre	X		
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester	X		
8. Nastend Farm, Stroudwater Business Park	X		
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West			

4. Please give a reason for your answers to Question 3.

Residual waste management can be undertaken at almost any scale, and any appropriate B2 site would be suitable.

4. Officer Response.

Number 322 Type OTH Name Adrian Jones Organisation West Glos Green Party

Comment noted. The council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed). However GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the county. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. The advantages and disadvantages would be investigated further during procurement process.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Agree

6. Please give a reason for your answer to Question 5.

With urban extensions comes more waste. With more waste comes the duty to manage this in proximity to the point of waste arisings.

6. Officer Response.

Support noted. The integration of waste management facilities into the urban extensions would allow waste from these developments and the wider Gloucester and Cheltenham area to be treated close to source in line with national and regional policy. However, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the intention of Government to abolish RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

See the answer to 1. above.

8. Officer Response.

See response to Q1/2.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		X
2. Hurst Farm, Lydney	X		
3. Land at Lydney Industrial Estate, Lydney	X		

10. Please give a reason for your answers to Question 9.

I do not have knowledge of site 1(a). I do of sites 2(a) and 3(a) - these are eminently suitable - they are well located, well served by road links, and offer some possibility of multimodal transport, being served by a harbour and a railway line - future infrastructure development may well see this possibility realised. I am a local resident, and these are literally in my backyard, and I think they could be an asset to the local community which is very poorly served for waste management options

Number 322 Type OTH Name Adrian Jones Organisation West Glos Green Party

at present.

10. Officer Response.

Support for sites 2a and 3a noted. The potential for multi-modal transport is acknowledged. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. These sites will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the sites forward as allocations at this stage does not mean that the sites are unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

See my earlier responses. We need all the sites we can get! I am mindful of the Revised Waste Framework Directive, and particularly the requirements under Article 28. I am concerned that the narrow Zone C only approach may not be compliant with this Article. Also - the plan makes no reference to the capacity of existing waste management installations or exempt facilities. Has this been surveyed in any detail? Where this has been undertaken elsewhere, there is often a surprising amount of overlooked capacity. This issue needs to be considered. Also not apparent was the degree of overcapacity allocated within the proposed sites. It is very important to factor in overcapacity to allow for future changes in site availability. Has this been considered? If so, where is the detail?

12. Officer Response.

See previous responses. In relation to capacity and data figures please refer to Waste Technical Evidence Paper WCS-A.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

Cinderford does not appear to have been appropriately considered. Given the industrial land allocation there, I am of the opinion that there is scope for development of small scale waste management facilities - there are already at least two permitted facilities that I am aware of on the Cinderford Ind Estate. Coleford is too constrained, and I cannot think of appropriate sites in this area. The former Rank Xerox site at Mitcheldean may well be suitable for small-scale in-building development, but again this is subject to pressures on existing allocations, and commercial realities may rule this out. Newent also needs to be considered, although there are no obvious sites that come to mind there. Developments external to Gloucestershire need to be considered as well. There is development of significant waste management infrastructure in SE Wales which may well seek commercial wastes from Gloucestershire. I would contact the Welsh Assembly Govt to seek their views on developing waste infrastructure there, as well as seeking views from surrounding English authorities.

13. Officer Response.

Several areas of employment land in Cinderford, Coleford and Newent were considered. Technical assessments were carried out on all of the sites which were above 2ha in size. These included the Northern United site (ref 051), the Lightmoor site (ref 052), Longhope (ref 057), Mitcheldean (Stenders - ref 058), Old Station Yard, Newent (ref 088), Wilderness Quarry (site 093), Mitcheldean (Rank Xerox - ref 290); Drybrook (ref 291); Longhope STW (Ref 510); Cinderford (ref 527); Coleford areas (ref 528), Newent Business Park and Extension (Ref 530). The main reasons why these sites did not make the consultation document were highways issues, flood risk issues and landowners indicating that the site(s) were unavailable. Please refer to Technical Evidence Paper WCS-N and Appendix C (C.6, C.7, C.8, C.9, C.11, C.31, C.32, C.66, C.69, C.70, C.71, C.72. The purpose of this consultation was only to consider sites suitable for residual MSW treatment within Gloucestershire. Gloucestershire County Council is not legally able to allocate sites in a Waste Core Strategy that are outside its administrative boundary. The views of both the Welsh Assembly Government and Monmouthshire Council were sought as part of this consultation.

Number 322 Type OTH Name Adrian Jones Organisation West Glos Green Party

14. Do you have any comments on the Executive Summary?

No.

14. Officer Response.

Noted.

15. Do you have any comments on Section 1?

No.

15. Officer Response.

Noted.

16. Do you have any comments on Section 2?

No.

16. Officer Response.

Noted.

17. Do you have any comments on Section 3?

Yes. You referenced WCS-A - waste data - in this section, but it does not appear to be available to download. I would be very interested to see how you have derived data on C&I wastes within the County, as these will be derived by survey, and will be prone to considerable error. Also, the waste growth/reduction projections over time do not appear to be immediately apparent - where are these? There also appears to be no estimate in relation to the change in waste composition over time, which is a critical factor. Has an attempt been made to project this?

17. Officer Response.

Comment noted. Technical Evidence Paper WCS-A Waste Data was, and still is available to download along with a number of other WCS related evidence papers on the Council's website. The paper will be updated in advance of the publication of the WCS an will include a new survey of local waste operators. Latest EA data will also be used as well as data supplied by the Waste Disposal Authority via Defra's Waste Data Flow. In terms of forecast changes in waste arisings (growth/reduction projections over time) this information was included in the WCS-A Waste Data paper and is also included in the updated paper prepared for the WCS Publication.

18. Do you have any comments on Section 4?

Yes. I believe that by restricting the choice of sites in the way that you have done here that failure to deliver sites (and hence failure to implement the plan and risk infraction under Article 28) is a very real possibility. I would suggest that the site selection process needs to be revisited and further sites considered.

18. Officer Response.

Comment noted. The site options consultation paper identifies 13 potential strategic site allocations, 10 in Zone C and 3 outside. These 13 sites were derived from an original list 329 sites. The site selection process is considered to be robust and comprehensive. The choice of site options has not been restricted. The 13 sites included in the final consultation paper are those that have the least planning constraints and a willing landowner. They therefore represent the most deliverable options. It is also pertinent to note that the site options consultation has resulted in only a small number of alternative sites being identified and put forward by landowners, two of these being extensions to sites already identified. Having regard to the above, it is not considered necessary to revisit the site selection process or consider any alternative sites.

19. Do you have any comments on the Sustainability Appraisal reports?

No.

19. Officer Response.

Number 322 Type OTH Name Adrian Jones Organisation West Glos Green Party

Noted.

20. Do you have any comments on the Habitat Regulations report?

No.

20. Officer Response.

Noted.

Number 392 Type IND Name Michelle Jones Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Because Zone C is already heavily overused in other aspects, e.g. industry, existing landfill sites, housing, etc. and I believe that any waste sites in this area will impact heavily on infrastructure, increasing noise levels and so on.

2. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should `provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, `with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. The focus on Zone C is consistent with national and regional policy allowing for most of Gloucestershire's waste to be treated close to source and also avoiding environmental constraints including AONB and floodplain. The re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield		X	
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works		X	
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

For the "Don't Know" responses this because I have insufficient local knowledge of these areas. For the other responses, these are areas which I believe are already used for other purposes (refer to Q2)

4. Officer Response.

Comment noted. The re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard

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must be had to the cumulative effect of previous waste facilities on the care and well being of the local community.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Disagree

6. Please give a reason for your answer to Question 5.

Same reasons as Q2

6. Officer Response.

Comment noted. See previous comments.

7. Do you support the identification of sites outside Zone C?

I'm not sure/I don't know

8. Please give a reason for your answer to Question 7.

Presumably no suitable sites have been identified outside of Zone C to act as alternatives to those within Zone C (what you are proposing here are sites to act as support to sites within Zone C). Clearly those sites outside of Zone C either fall within The Forest of Dean or Cotswols AONB where obviously it will be much harder to obtain the necessary planning permissions to set up one or more main waste facilities.

8. Officer Response.

Noted.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

Lack of local knowledge about these areas

10. Officer Response.

Noted.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

Although, as a resident within Zone C, I would obviously prefer not to have any new sites created within that zone but then that is tantamount to NIMBYism

12. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also

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be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements.

Number 327 Type IND Name Charles Kaye Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

The area would appear to be outside the floodplain and Cotswold AONB and is large enough to ensure waste treatment plants are not operated close to housing areas.

2. Officer Response.

Support for Zone C noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Disagree

6. Please give a reason for your answer to Question 5.

I also oppose urban extensions to Gloucester and Cheltenham before 2026. However, if more housing is required in Gloucestershire in the longer term, urban extentions to Gloucester and Cheltenham will be necessary. Such extensions would be compromised if waste treatment facilities are place there earlier.

6. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to

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develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. Notwithstanding this, it is significant to note that the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a waste treatment facility or facilities as part of those proposals. Furthermore, the intention of Government to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I'm not sure/I don't know

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

I am not familiar with these sites

10. Officer Response.

Noted.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I'm not sure/I don't know

14. Do you have any comments on the Executive Summary?

At present, I do not have a computer and have not seen all your consultation documents. My opinions are based on visiting the road show held in Bishops Cleeve on 2/11/09 which I found to be well organised and very helpful.

14. Officer Response.

Support noted.

15. Do you have any comments on Section 1?

what is the confidence level (probability) of achieving 60% recycling/composting of waste? Could some back up data be provided to convince the public that 60% is a realistic target. How many treatment sites are required to handle 150,000 tons/year?

15. Officer Response.

The Council and it partners have a strategy target of recycling and composting at least 60% of our waste by 2020 and we have increased recycling rates from 14% in

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2002 to 43% in 2010. To facilitate this step change we are working with our partners to deliver the Joint Waste Strategy. This is clearly demonstrated by our partners changing their collection systems to facilitate more recycling by collecting new materials such as food, card and plastics. So far Cotswold District, Gloucester City and Tewkesbury Borough Councils have changed their collection systems. Experience has shown that this step change can deliver surprising results with Cotswold recycling and composting rate jumping from around 40% to 60% between 2008 and 2009. We are actively working with the remaining District Councils to facilitate these sorts of changes and are confident that we will achieve our overall target of recycling and composting a minimum of 60% by 2020. As explained in the consultation paper, provision could be made in the form of one large facility or several smaller facilities. The Publication WCS will identify enough sites taking into account the need for flexibility and contingency.

16. Do you have any comments on Section 2?

Is the forecast of waste to be treated in Gloucestershire based on an additional 56,000 houses to be built in Glos. by 2026? If regional spatial strategy is not implemented (by a new Govt., say) what is the impact in your forecast? Could this mean substantially less waste treatment sites for the period 2026? Do the proposed waste treatment plants handle waste from Gloucestershire only (i.e. no waste imported from other countries)?

16. Officer Response.

The figure of 150,000 tonnes per annum is based on future predicted growth in Gloucestershire. The Council continually reviews its waste forecasts for the future, for example, when GCC submitted its Expression of Interest to DEFRA in 2007, it predicted the county would produce approximately 175,000 tonnes per annum of residual waste (again, assuming we achieved our 2020 recycling target). When GCC submitted its Outline Business Case to DEFRA in April 2008 the predicted tonnage of residual waste at 2040 reduced to 150,000 tonnes per annum (again, still assuming we reach our 60% target). A lot of factors influence waste growth - the number of houses in the county, population changes, laws (that stop particular materials from being put into landfill), the economy, the changes that our district councils make to their waste and recycling collections and significantly, the extent to which the population of Gloucestershire are opting to recycle or not recycle. In terms of importing waste, the council endeavours to deliver a solution to manage Gloucestershire's residual waste, not waste from outside the county. To promote the flexibility of the solution and further recycling above the minimum 60% target, the council would be open to views on the treatment of Gloucestershire's commercial waste. It is important to note that household waste is only about 25% of the total waste produced by Gloucestershire.

17. Do you have any comments on Section 3?

I am unsure of the relationship (if any) between the size of individual treatment plant and the distance of the site from residential housing. I am assuming that the larger the treatment plant the more distant the proposed plant should be from residential housing. I have not seen any comments in your reports regarding this.

17. Officer Response.

Comment noted. There is no direct relationship between the size of facility and distance from housing. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements.

19. Do you have any comments on the Sustainability Appraisal reports?

Although the report concedes that significantly increased traffic problems will result if new plants are sited at Wingmoor Farm, there appears to be no description of

Number 327 Type IND Name Charles Kaye Organisation not applicable/not provided

what measures will be taken on the highways to overcome the additional traffic hazards and impact on environment.

19. Officer Response.

Comment noted. For scoring sites against SA Objectives 17 Air Quality and 19 Impacts of lorry traffic the SA Reports used the initial assessment of sites provided by Gloucestershire Highways as a basis. Any strategic site allocation made in the Publication WCS will be supported by a further highway assessment with any necessary mitigation (e.g. junction improvements) clearly identified as site-specific requirements. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan which will help to identify any further necessary improvements.

Number 199 Type IND Name Peter Kearns Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I'm not sure/I don't know

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West	X	X	

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Disagree

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

Number 423 Type IND Name Susan Kennedy Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

Wingmoor Farm is too close to residential areas and we suffer from unpleasant smells, flies and are concerned about the air quality and possible pollution. The methane gases produced are problematic for rural areas where animals graze and crops are grown.

4. Officer Response.

Comments noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. Odour along with issues such as noise and dust are matters that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any 'sensitive receptors'. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning conditions. With regard to pollution it should be noted that planning and pollution control regimes are separate but complimentary. Pollution control is concerned with preventing pollution whilst planning controls the development and use of land. Waste planning authorities are expected to work on the assumption that the relevant pollution control regime will be properly applied and enforced. Importantly, the purpose of this consultation is to identify a site suitable for locating a waste treatment facility. The provision of such a facility will help to prevent waste entering landfill and causing fugitive emissions of methane. Such a facility is also likely to be less associated with potential odour problems than landfill as waste is delivered to an enclosed environment.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Disagree

Number 423 Type IND Name Susan Kennedy Organisation not applicable/not provided

6. Please give a reason for your answer to Question 5.

This is a loss of precious greenbelt land.

6. Officer Response.

Comment noted. The potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the Waste Core Strategy.

7. Do you support the identification of sites outside Zone C?

I do not support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

Brownfield sites should be used. Once the countryside has been lost, it is gone forever. Please see earlier response.

8. Officer Response.

Comment noted. See previous response. The re-use of previously developed (brownfield) land is a priority. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I do not support the approach of using a combination of sites from within and outside Zone C

17. Do you have any comments on Section 3?

Wingmoor Farm is too close to residential areas such as Stoke Orchard, Bishops Cleeve, Elmstone-Hardwicke and Tredington and affects many people in the surrounding area. Unpleasant smells, flies and dirt all create an unhygienic environment which does not need to be increased. Access to this site is poor. However, the pollution from traffic and the development of rural land to create roads will only have a detrimental effect on nature and the decreasing countryside.

17. Officer Response.

Please see response to Q4.

Number 267 Type IND Name Lynsey Kitchener Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Highly populated residential area and too near my home and children's school. The toxins related to this activity are horrendous!

2. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. In terms of 'toxins' and health impact, it is important to note that PPS10 states that 'Modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health'.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch		X	
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

Volatile Organic Compounds are going to be produced and these are known carcinogens which will affect a huge residential area.

4. Officer Response.

Comment noted. Please see response to Q2.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

7. Do you support the identification of sites outside Zone C?

Number 267 Type IND Name Lynsey Kitchener Organisation not applicable/not provided

I'm not sure/I don't know

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		

10. Please give a reason for your answers to Question 9.

Less residential impact

10. Officer Response.

Comment noted. Please see response to Q2 in relation to residential impact. In relation to sites outside of Zone C, it is essential that the WCS provides a clear strategy setting out what will be built and where. This will provide certainty and confidence to the development industry and help bring proposals forward. The Council's preferred strategy is to focus the location of new strategic waste management facilities on the area defined as Zone C. This approach is considered to be consistent with national policy (PPS10) and the Regional Waste Strategy. Although the preferred focus for strategic waste management is Zone C, a number of other sites were identified outside this zone in the Forest of Dean and Cotswold District in order to provide suitable flexibility and support for the Zone C sites. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I do not support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

I don't feel that any residential area should be used

12. Officer Response.

Please see response to Q2.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

Any area where it is not highly populated or near schools

13. Officer Response.

Please see response to Q2.

Number 18 Type IND Name T P Knight Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I write to object to the use of all 13 of the sites listed for possible waste treatment in Gloucestershire on the grounds that: Any of these sites could be used for incineration, which I oppose. Incineration creates toxic Dioxins & fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. Were this technology is used in other countries these are the main two items of concern. Incinerators act as a disincentive to reduce, reuse and recycle. I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account newer more efficient and effective technologies which are being rapidly developed. The long term costs to the taxpayer will be higher with incineration. The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste the increased road congestion and transport costs to everyone We need to take responsibility for the disposal of the waste we create in our own areas and have localised ways of dealing with waste to reduce this transport cost and road congestion. Gloucestershire Council need to take responsibility for their inaction over many years and try and find a solution that is forward thinking and not rely on old technology though used all over the world is now having many questions asked about it.

17. Officer Response.

Comments noted. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 252 Type IND Name Dave Koncher Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

There is enough of this type of thing in the area.

2. Officer Response.

Comment noted. It is essential that the WCS provides a clear strategy setting out what will be built and where. This will provide certainty and confidence to the development industry and help bring proposals forward. The Council's preferred strategy is to focus the location of new strategic waste management facilities on the area defined as Zone C. This approach is considered to be consistent with national policy (PPS10) and the Regional Waste Strategy . Although the preferred focus for strategic waste management is Zone C, a number of other sites were identified outside this zone in the Forest of Dean and Cotswold District in order to provide suitable flexibility and support for the Zone C sites. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch		X	
4. Javelin Park, Haresfield		X	
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park	X		
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

as above

4. Officer Response.

See previous response.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Disagree

6. Please give a reason for your answer to Question 5.

The effect on the surrounding area.

Number 252 Type IND Name Dave Koncher Organisation not applicable/not provided

6. Officer Response.

Comment noted. The Government's intention to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I'm not sure/I don't know

Number 415 Type IND Name Connor L Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I am writing to voice my anger over the proposed use of the clay club ground at wingmoor farm for waste treatment. Cheltenham & district clay club is a well Established shooting club and as far as I can see the only proposed site with a recreational activity already on it. It is my belief that it would be a real struggle to find new facilities of this standard. The club has spent many years getting the layout and the area right many trees have been planted (aprox 400 witch we are all encouraged to do in this climate). And there is a real lack of good quality clay shooting grounds around. This area being on small roads will be seriously affected by the extra traffic where as other sites are located on or near main roads and many of these sites are already vacant.

17. Officer Response.

Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the 'inclusion criteria' for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that his site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS national policy and any other material considerations.

Number 66 Type PC Name Richard Lacey Organisation Stonehouse Town Council

17. Do you have any comments on Section 3?

I write to advise that this Council has examined the documentation in respect of identifying potential sites and concern has been raised in respect of the locations particularly as follows: 4. Javelin Park, Haresfield 8. Nastend Farm, Stroudwater Business Park, Stonehouse Council however finds it impossible to offer constructive views in this respect whilst no proposed methods of treatment are identified with those, and other, sites. They regard the consultation process in this respect not specific enough until such methods are offered in respect of each site location.

17. Officer Response.

Comment noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. With regard to Site 8, Nastend farm, the Waste Planning Authority has carefully considered all the issues on this site. Since the site options consultation was undertaken in October 2009 and following discussions with the County Council as Waste Disposal Authority, there is significant uncertainty over the prospect of delivering a strategic waste management facility on this site. For this reason, it has been decided that this site will not be taken forward into the Publication WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS national policy and any other material considerations.

Number 310 Type IND Name Helen Lane Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I'm not sure/I don't know

2. Please give a reason for your answer to Question 1.

I understand that waste needs to be dealt with near to where it was produced to reduce environmental impact regarding transport. However, I don't think it should be disposed of actually in close proximity of residential areas or on green belt land.

2. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. With regards to Green Belt land, whilst it is acknowledged that the Green Belt should generally be protected, PPS10, emphasises that local authorities should recognise the particular locational needs of some types of waste management facilities when defining detailed green belt boundaries and, in determining planning applications. In line with the PPS10 companion guide, should any sites within the Green Belt be specifically allocated within the WCS, it will need to be clearly indicated that they are for waste management purposes only.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch		X	
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

My opinions are based on Easter Park because this is in my local area. This site has not only been proposed for household waste but for commercial and industrial waste aswell, including incineration. I feel this is worrying as the area backs on to a housing estate, which in turn backs on to the much larger housing estate of Northway. There are several schools, an army camp aswell as many other businesses in this area. I am concerned with the environmental effect on having such a site so close to habitation- which could potentially lead to health problems for those living nearby. This could come from chemicals being released into the ground and

Number 310 Type IND Name Helen Lane Organisation not applicable/not provided

air . I am also concerned this could lead to a large vermin increase. The information also says there will 'probably be a net decrease in traffic' I know this site has previously been used for commercial use, but I am unsure of the evidence to suggest that there will be a decrease. This road is an extremely busy one with long queues of traffic at peak times.

4. Officer Response.

Comments noted. Dealing with each point in turn. In terms of the type of waste, the focus of the site options consultation was on finding sites suitable for managing municipal (mainly household) waste. Commercial and Industrial (C&I) waste is very similar in composition to municipal waste and for some of the sites including Easter Park the potential exists to provide a facility managing both waste streams. The main focus of any allocation will however be municipal waste. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the companion guide to PPS10 which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.

Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. With regard to health impacts PPS10 states that appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health. Furthermore, the detailed consideration of a waste process and the implications, if any, for human health is the responsibility of the pollution control authorities. PPS10 also states that, where concerns about health are raised, waste planning authorities should avoid carrying out their own detailed assessments rather they should ensure, through drawing from Government advice and research and consultation with the relevant health authorities and agencies, that they have any advice on implications for health. The WPA duly sought the advice from the PCT/NHS through the site options consultation. In respect of pollution, PPS10 states that modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health. It should be noted that planning and pollution control regimes are separate but complimentary. Pollution control is concerned with preventing pollution whilst planning controls the development and use of land. Waste planning authorities are expected to work on the assumption that the relevant pollution control regime will be properly applied and enforced. With regard to Vermin, modern waste management facilities involve waste being delivered into a relatively enclosed environment thereby minimising problems with odour, vermin etc. Such issues are generally dealt with through planning condition at the planning application stage should a detailed proposal come forward. With regard to traffic, PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. Notwithstanding the above, the site has

Number 310 Type IND Name Helen Lane Organisation not applicable/not provided

not been taken forward into the Publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Disagree

6. Please give a reason for your answer to Question 5.

There has been a large increase in housing and 'employment land' in the area in the last few years, As previously stated I don't think waste sites should be in close proximity to residential areas.

6. Officer Response.

Comment noted. Please see previous comments on these matters.

7. Do you support the identification of sites outside Zone C?

I'm not sure/I don't know

8. Please give a reason for your answer to Question 7.

I personally have no knowledge of these areas in order to comment.

8. Officer Response.

Comments noted.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

I personally have no knowledge of these areas in order to comment.

10. Officer Response.

Noted.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I'm not sure/I don't know

16. Do you have any comments on Section 2?

I do understand the need for waste sites but as I have commented I don't think waste sites should be in close proximity to residential areas.

16. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants.

Number 310 Type IND Name Helen Lane Organisation not applicable/not provided

However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements.

Number 410 Type IND Name Eva Langrock Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

I prefer a dispersed solution of 2-3 smaller waste sites rather than one bigger centralised one, partly because of the likelihood of an increase in oil prices and resulting higher costs of transportation over the period of 2016-2026. And partly because I agree with the view of respondents to the Issues & Options Consultation which you summarize on page 60, Flexibility was seen to be important and an acknowledgement of fast-changing land use and technology.

2. Officer Response.

Comment noted. The site options consultation paper identifies 13 sites, 10 within Zone C and 3 outside. The paper asks for views on whether a combination of sites should be used. It does not focus on a one-site solution. Zone C includes Gloucester and Cheltenham and therefore allows for most of the waste in Gloucestershire to be managed close to source, in line with national and regional policy. This will help to reduce the distance the waste has to travel to be treated. Furthermore, the use of transfer facilities to 'bulk-up' waste from smaller collection vehicles into larger vehicles, will help to reduce the number of separate trip movements that need to be made for the waste to reach the treatment/recovery facility/facilities. In terms of flexibility, it should not be assumed that economies of scale mean an inflexible solution. GCC recognises that regardless of the type of solution proposed, it is important that the solution must be able to cope with changes in waste volumes and composition, as it is inevitable such changes will happen. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. Flexibility is a separate sub-criterion within Operational, Service and Technical Deliverability. This will be addressed throughout the process and is recognised as a key factor for the project.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

It seems neither in 2006 nor in 2008 has there been any consultation about which of the technologies outlined in your publication Waste - it's everybody's problem - MBT, Autoclave, Incineration and Advanced Thermal Treatment - will be implemented. This makes answering your questionnaire difficult as the suitability of the sites depends on your choice of technology. In the appendix Planning for the Protection of European Sites - Habitat Regulations Assessment (HRA) Screening Report for WCS Site Options October 2009 clearly shows that the assessment of the 10 potential sites suggests 8 times Likely Significant Effect if Thermal Treatment of waste

Number 410 Type IND Name Eva Langrock Organisation not applicable/not provided

was INCLUDED and 5 times No Likely Significant Effect if Thermal Treatment was EXCLUDED, while the rest (Uncertain Effect) requires further assessment. IF, therefore, incineration was your chosen technology, I would answer Not Suitable for all sites for a number of reasons which I'll state below. On the other hand, if MBT was your chosen technology I would answer Suitable for all sites, again for various reasons which I'm giving below, too. Reasons against incineration on any of the sites: 1.Incineration poses a hazardous risk to the environment and health. According to studies by HM Customs & Energy in 2004 the impact on climate change of incineration are worse thatn those of landfill, even taking intott account the offsets associated with energy recovery as it produces more greenhouse gases than other forms of waste treatment. Incineration of waste also leads even in newer models to an output of 5% toxic 'fly ash' which requires costly depositing, and 30% contaminated 'bottom ash', which goes into landfill. Moreover numerous studies have shown correlation between the proximity to an incinerator and increased number of cancer and abnormal development in children and teenager populations. 2. Incineration requires high temperatures in excess of 850°C 24/7. This requires a permanent waste stream for fuel, thus reducing the incentive to minimise waste. This would go totally against the responses to your Issues & Options Consultation regarding Implementing the waste hierarchy, I quote All respondents considered that waste minimisation was important and should be promoted through the WCS (p59). And lastly, incinerators tend to be large centralised facilities and cannot be run flexible to meet the changing needs of the future. Reasons for MBT on all sites: 1. MBT produces far less greenhouse gases and no air pollution. 2. MBT - especially when combined with removing dry recyclables and an anaerobic digester for kitchen and garden waste - can reduce residual waste by 80%. 3. MBT plants can have a flexible hall system that can meet changing waste treatment requirements and is therefore well suited to meet changing needs in the future. As MBT plants are smaller they can be used for a dispersed solution.

4. Officer Response.

Comments noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

6. Please give a reason for your answer to Question 5.

I prefer a dispersed solution of 2-3 smaller waste sites rather than one bigger centralised one as stated in Question 2. This would enable the County Council to respond flexibly to a changing need for waste treatment as it arises.

6. Officer Response.

Support noted. The integration of waste management facilities into the urban extensions would allow waste from these developments and the wider Gloucester and Cheltenham area to be treated close to source in line with national and regional policy. However, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

Number 410 Type IND Name Eva Langrock Organisation not applicable/not provided

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

I prefer a dispersed solution of 2-3 smaller waste sites rather than one bigger centralised one as stated in Question 2. This would enable the County Council to respond flexibly to a changing need for waste treatment as it arises.

8. Officer Response.

Support noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney		X	
3. Land at Lydney Industrial Estate, Lydney		X	

10. Please give a reason for your answers to Question 9.

1a seems suitable, assuming you won't choose incineration or thermal treatment as your waste treatment technology - see reasons under question 4. The accompanying Planning for the Protection of European Sites - Habitat Regulations Assessment (HRA) Screening Report for WCS Site Options October 2009 which clearly suggests a (Very) Likely Significant Effect if there were waste sites near Sites 2a and 3a.

10. Officer Response.

Support for Site 1a noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. Comments in respect of sites 2a and 3a noted. The two Lydney sites are very close to the Severn Estuary Special Area of Conservation (SAC) / Special Protection Area (SPA) / Ramsar site. As per the requirements of the Habitats Directive (92/43/EEC) and the Birds Directive (79/409/EEC) further work is being under taken on all the 13 sites to ensure that the International / European sites in and close to Gloucestershire are fully protected. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. These sites will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the sites forward as allocations at this stage does not mean that the sites are unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

Number 410 Type IND Name Eva Langrock Organisation not applicable/not provided

12. Please give a reason for your answer to Question 11.

See Q10

12. Officer Response.

See previous response.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No

13. Officer Response.

Noted

14. Do you have any comments on the Executive Summary?

Using sites in AONB doesn't have to be a hindrance as can be seen in the HDA appendix, assuming thermal treatment is excluded.

14. Officer Response.

Comment noted. Please see response to Q10.

15. Do you have any comments on Section 1?

It is disappointing that you don't invite a debate on which technology will be implemented; at least there is no information on p 14 that would suggest so.

15. Officer Response.

Comment noted. See response to question 14.

16. Do you have any comments on Section 2?

No.

16. Officer Response.

Noted.

17. Do you have any comments on Section 3?

No.

17. Officer Response.

Noted.

18. Do you have any comments on Section 4?

It is a pity that there is no consultation with the public about the technology which will be chosen. Afterall it is the public who will have to live with any consequences (financial, environmental/health).

18. Officer Response.

Comment noted. Please see response to Q14.

19. Do you have any comments on the Sustainability Appraisal reports?

I disagree that Objective 15 is sufficiently covered by 1, 3, 16-18 as it is the only objective that clearly states "to apply the precautionary principle in consultation with waste regulation authorities."

19. Officer Response.

Number 410 Type IND Name Eva Langrock Organisation not applicable/not provided

Comment noted. The precautionary principle is inherently being applied to the site allocation process through the site assessment methodology and the independent SA. The Environment Agency is the Waste Regulation Authority and they have not objected to this approach.

20. Do you have any comments on the Habitat Regulations report?

No.

20. Officer Response.

Noted.

Number 204 Type IND Name Catherine Larmouth Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

The approach of focusing the search for strategic waste sites in the area of 'Zone C' is supported as it is consistent with the EU Waste Framework Directive 2008, national planning policy i.e. Planning Policy Statement 10: Planning for Sustainable Waste Management and the Waste Strategy for England 2007 and Draft Regional Spatial Strategy (RSS) for the South East, which all aim for waste to be disposed of in one of the nearest appropriate installations (Paragraph 3 of PPS10). This will contribute to reducing the level of waste miles travelled and provide a more sustainable facility. The sites within 'Zone C' are all located beyond the floodplain and the Cotswolds AONB.

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch			
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre	X		
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works		X	
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

1. This site comprises three separate parcels of land and is adjacent to an existing landfill / landraise site. Although the sites are not ecologically rich there is a key Wildlife Site within 500m of Areas A and B. There are considered to be no significant flood issues, as the site is in Flood Zone 1 (EA Flood Data). There are residential properties, a farm and a business park within 250m of the boundary. The site lies within the Green Belt where development of the type necessary to deliver a strategic waste facility is considered to be 'inappropriate' unless very special circumstances can be demonstrated. The harm, by reason of inappropriateness, and any other harm, should be outweighed by the very special circumstances (PPG2). This is not considered to be the case in this instance. 2. This site also consists of three separate parcels of land and is located to the west of the existing Wingmoor Farm West landfill site. There are relatively few sensitive receptors such as residential dwellings in the vicinity and it is not clear if there would be an effect on biodiversity. The site lies within the Green Belt and is not considered to be suitable for the same reasons as site 1, as a strategic waste development of this type would constitute inappropriate development in the Green Belt. Traffic levels on the local road network would increase and lead to problems at junctions of the A435. 3. This site is considered suitable as there is good access to the M5 at Junction 9 and the traffic levels resulting from the waste development would not be significantly higher than the existing situation. There are no significant areas of biodiversity, the site lies within Flood Zone 1. As the site is within a large business park / industrial estate the waste development would not have a significant visual impact on the area. There are residential properties within 250m of the site; however these are north of existing buildings located between the site and the dwellings. 4. Javelin Park is

Number 204 Type IND Name Catherine Larmouth Organisation not applicable/not provided

considered to be the most suitable of the ten identified sites. It is previously developed land and priority is given to the re-use of previously developed land (Paragraph 21 pf PPS10). There are no significant ecological or flooding issues and the there is only one residential property within 250m of the site. The access to the site is very good due to the proximity to Junction 12 of the M5 motorway. The site is available and deliverable as it is partially owned by Gloucestershire County Council and the owner of the remainder of the site has indicated it is potentially available. 5. This site is previously developed land and is considered to be suitable as there are no known ecological or flooding issues and it is set within an existing business park. There are few sensitive receptors such as residential dwellings within 250m and the site is available and deliverable. Although the waste development could increase the levels of traffic on the local road network, in the longer term highway improvements could be made to mitigate the traffic issues. 6. This site is generally considered to be suitable as it is an existing C&D and C&I waste facility with good access to the M5 motorway. There are no biodiversity or flooding issues and there are only a few residential properties within 250m of the boundary of the site. The land owners have confirmed the site is available and deliverable. 7. This is an existing waste transfer site; however it is not considered to be suitable for a strategic waste one site solution due to the configuration of the site and the difficult access to the strategic road network. There are residential areas in close proximity to the site as well as additional proposed new housing. 8. This site is allocated in the Stroud Local Plan for future employment uses although it is not previously developed land. There could be a potential negative effect on biodiversity due to the proximity of BAP habitats and there are residential properties and businesses within 250m of the boundary of the site. The increase in traffic levels would exacerbate existing congestion issues on nearby local roads and junctions. It is therefore not considered a suitable site. 9. Netheridge Sewage Treatments Works is not considered to be a suitable site as it would require configuration and could not accommodate a one site solution. There could potentially be ecological and flooding issues and the site is within 250m of residential properties. There are existing capacity constraints on the local road network which would be made worse as a result of the waste facility being located at this site. 10. This identified industrial estate has existing waste management uses, is close to a HRC and an active landfill. There would be no significant effects on biodiversity and no flooding risks. This site lies within the Green Belt however, where a development of this type is inappropriate unless very special circumstances exist that outweigh the harm that would be caused to the Green Belt. This site is not considered to be suitable for a strategic waste use as it conflicts with national Green Belt planning policy (PPG2).

4. Officer Response.

Support for sites (Easter Park, Javelin Park, Quadrant, Moreton Valence) noted. Objections considered in turn below. 1. Areas A, B, C Wingmoor East - The presence of the Key Wildlife Site (KWS) is acknowledged. An initial biodiversity assessment of each site was carried out in support of the site options consultation. Should a detailed proposal come forward through a planning application, this would need to be supported by a more detailed assessment with any mitigation identified as necessary. Although there are properties within relatively close proximity of the three sites, this is not considered to preclude the possibility of development. In respect of the Green Belt, the whilst it is acknowledged that the Green Belt should generally be protected, PPS10 emphasises that local authorities should 'recognise the particular locational needs of some types of waste management facilities when defining detailed green belt boundaries and, in determining planning applications'. In line with PPS10 companion guidance, should any sites within the Green Belt be specifically allocated within the WCS, it will need to be clearly indicated that they are for waste management purposes only. The Publication WCS identifies part of Area C as a strategic site allocation under Core Policy WCS4. This site has been taken forward because it forms part of an existing waste management facility with support from the landowner/waste operator, which greatly increases the prospect of delivery. The site is also close to Cheltenham one of the county's two main urban areas. Furthermore the site is not at risk from flooding and there are relatively few sensitive uses located nearby. The importance of traffic issues in this area is recognised and any development would need to be supported by a Transport Assessment (TA) as appropriate. Area A is closest to a number of sensitive receptors and Following discussions with the waste operator it is evident that Area B is likely to be needed for other waste uses associated with the existing landfill operation and subsequent site restoration. For these reasons and having regard to the level of additional waste recovery capacity needed over the plan period, Areas A and B will not be taken forward into the Publication WCS. It should be noted that by not taking either Area forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having

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regard to the relevant general policies of the WCS, national policy and any other material considerations. 2. Areas A, B, C Wingmoor West - The initial assessment of biodiversity has revealed an uncertain impact. Should a planning application come forward on any of these three sites it would need to be accompanied by a more detailed assessment with any mitigation identified as necessary. In terms of the Green Belt please refer to comments on Wingmoor Farm East above. PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. In relation to the three Wingmoor Farm West sites, The Publication WCS identifies Area B as a strategic site allocation under Core Policy WCS4. This site has been taken forward because it forms part of an existing waste management facility with support from the landowner/waste operator, which greatly increases the prospect of delivery. The site is also close to Cheltenham one of the county's two main urban areas. Furthermore the site is not at risk from flooding and there are relatively few sensitive uses located nearby. Area A is unallocated greenfield land within the Green Belt, has some sensitive receptors nearby to the south and there has been no significant interest from the waste industry for strategic waste recovery which raises question marks over the deliverability of a strategic waste management operation on this site. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the inclusion criteria for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Areas A and C will not be taken forward into the Publication WCS. It should be noted that by not taking either Area forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations. 7. Notwithstanding the above, the site has not been taken forward into the Publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over

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the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the Publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations. 8. Nastend Farm - Notwithstanding the above the site has not been taken forward into the Publication WCS because although the County Council is the landowner, following discussions with the County Council's Waste Disposal Authority (WDA) it would appear that there is significant uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore, the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the Publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.
9. Notwithstanding the above, the site has not been taken forward into the Publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore, the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the Publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. The site's existing Anaerobic Digestion (AD) capacity for waste water and other assorted wastes is recognised and any additional increase in these facilities would be considered through other criteria-based policies in the WCS. 10. The Park - The site has been taken forward into the Publication WCS because it forms part of an existing waste management facility and there is support from the landowner which greatly increases the prospects of delivery, the site is located in close proximity to Cheltenham, one of the County's two main urban areas where most of Gloucestershire's waste arises, the site is not at risk of flooding and has no other significant nearby environmental constraints and there are relatively few sensitive uses located nearby. In relation to Green Belt issues, please see comments on Wingmoor Farm East above.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Disagree

6. Please give a reason for your answer to Question 5.

It is considered the urban areas of Gloucester and Cheltenham should not be extended. Any waste treatment facilities should be located within 'Zone C' which are more sustainable locations proximate to the sources of waste arisings and the strategic road network. If any urban extensions did come forward in the future then a need / sequential assessment could be undertaken to determine whether waste treatment facilities should be incorporated into these areas.

6. Officer Response.

Comment noted. The urban extensions are located within Zone C. However, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, Government's intention to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I do not support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

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Identifying sites outside 'Zone C' to support the main facility is not supported as there should only be a one site solution. In theory it could be considered there is a benefit of locating a waste transfer facility for bulking waste at a location in the east of the county. This would not be a sustainable or economically viable option however due to the distance from the main sources of waste arisings. The site at Javelin Park is the most appropriate site as it is proximate to Gloucester and Cheltenham and the strategic road network. There may be existing small scale waste transfer facilities that could support the chosen main site or that could provide opportunities for heat networks for example (i.e. CHP).

8. Officer Response.

Comment noted regarding support for a one site solution at Javelin Park. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester		X	
2. Hurst Farm, Lydney		X	
3. Land at Lydney Industrial Estate, Lydney		X	

10. Please give a reason for your answers to Question 9.

These three sites are not suitable for the treatment of residual household waste. The strategic waste site should be located in 'Zone C'.

10. Officer Response.

Comment noted. Please see response to Q8.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I do not support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

There should be a one site solution located within 'Zone C' rather than a combination of sites. The most suitable site is considered to be Javelin Park.

12. Officer Response.

Comment noted. Please see response to Q8.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No

13. Officer Response.

Noted

14. Do you have any comments on the Executive Summary?

No comments

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14. Officer Response.

noted

15. Do you have any comments on Section 1?

No comments

15. Officer Response.

noted

16. Do you have any comments on Section 2?

No comments

16. Officer Response.

noted

17. Do you have any comments on Section 3?

No comments

17. Officer Response.

Noted

18. Do you have any comments on Section 4?

No comments

18. Officer Response.

Noted.

19. Do you have any comments on the Sustainability Appraisal reports?

No comments

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

No comments

20. Officer Response.

Noted.

Number 242 Type IND Name Cherry Lavell Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I have read enough about incineration to realise that it is completely the wrong way to go about disposing of waste. Here are some of my reasons: Incinerators discourage the useful utilisation of 'waste' materials which should be recycled instead. People should take more responsibility for the waste they create, rather than thinking it will be OK to send to landfill as someone is maybe going to get some energy out of it. Incinerators create toxic fly ash residue which has to be transported and buried, which creates a risk for everyone living along the route used, as well as those living near the burial site. The contracts will be for a very long period, at least 24 years, during which time much better solutions will become available, but the contract cannot be terminated early. Locking oneself in like that is sheer foolishness. Supposing there is more recycling happening as time goes on that could result in a lack of sufficient material to keep the incinerator continuously fed, which means importing more rubbish from elsewhere. Not a sensible way to go on. The costs to the taxpayer will be enormous how many people are aware of what it will cost them? Other authorities around the country have already discovered what a mistake they made ill choosing incineration, saddling their citizens with appalling costs for the foreseeable future. The sites 'on offer' are too closely bunched, which means more unnecessary trucking of materials around the county, rather than disposing of smaller amounts more locally. There are much better alternatives, notably mechanical biological treatment such as anaerobic digestion already proven technologies which do not cause embarrassing residues for disposal somewhere or other.

17. Officer Response.

Comments noted. Dealing with each in turn. The Council is currently technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. Following the decision by Defra in October 2010 to withdraw Gloucestershire County Council's Private Finance Investment (PFI) credits (worth £92million), the council is currently carrying out a strategic review of the project. The outcome from the review will be considered by Cabinet in February 2011. Ultimately Gloucestershire County Council has to find an alternative to landfill. Doing nothing is not an option. The contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Research shows that PFI helps deliver projects on time and on budget more effectively than other types of procurement. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly (amortising cost over shorter period) and therefore being unaffordable or there would be a balancing payment on contract expiry. It should not be assumed that economies of scale mean an inflexible solution. GCC recognises that regardless of the type of solution proposed, it is important that the solution must be able to cope with changes in waste volumes and composition, as it is inevitable such changes will happen. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability or a reduced cost to the authority. Climate change is a wider issue which the development of this solution can positively contribute. Carbon footprint is assessed as part of the life cycle analysis. DEFRA have commented on this issue directly by stating: The plans could also make an important contribution to the drive to tackle climate change by delivering estimated net carbon savings of 33,800 tonnes in 2020, compared to the current arrangements, or 64,700 tonnes if the final technology solution includes combined heat and power.

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1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Whilst we support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C' (i.e. outside the floodplain and Area of Outstanding Natural Beauty), this should not preclude waste development proposals outside 'Zone C' to come forward when exceptional circumstances can demonstrated and satisfactory mitigation measures are incorporated within the scheme.

2. Officer Response.

Support noted. The spatial strategy set out in the publication WCS is focused on Zone C with four strategic site allocations identified in this area. Speculative proposals that come forward on any other sites will be considered on their merits against relevant criteria.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
4. Javelin Park, Haresfield	X		

4. Please give a reason for your answers to Question 3.

We strongly support the identification of Javelin Park, Haresfield, as suitable for a strategic facility for the treatment of residual waste. Please refer to the enclosed letter of support. We write to you in connection with the identification of the site at Javelin Park as a potential site for a future strategic waste management facility as part of the Gloucestershire Waste Core Strategy Site Options consultation process. We would like to take the opportunity as part of the ongoing consultation process to register our support for the site to be identified for strategic waste management use within the Waste Core Strategy. We believe the site has excellent potential for waste management due to both its location and environmental setting, and its context within the present planning policy. Environmental Setting The site is located approximately 6 miles to the east of Gloucester, and some 500m to the south east of Junction 12 of the M5 motorway, with access to the site gained from Junction 12 of the M5 via the B4008. The site enjoys very good trunk road accessibility, with excellent transport links to the surrounding area. Javelin Park was formerly part of the Ministry of Defence's Moreton Valance airfield, with a series of aircraft hangers occupying the eastern half. Following its closure, the hangers were redeveloped and used for storage and distribution purposes. The buildings have now been demolished and the site currently comprises derelict land with areas of concrete hardstanding and mounds of demolition waste. The site is currently owned by Gloucestershire County Council. The site covers an area of approximately 11 hectares and benefits from outline planning permission for up to 485,000 sq ft of industrial and warehousing space. This outline planning permission provides a precedent for industrial development at the site, with the associated vehicle movements. There are limited sensitive receptors within the surrounding area. These include a number of scattered properties and farms alongside the B4008. The nearest sensitive receptor is The Lodge located across the B4008 to the east of the boundary of the site with the residential settlement of Haresfield situated approximately 1km to the east of the site. There are no public rights of way passing through the site. The Environment Agency's Flood Mapping information indicates that the site does not lie within the floodplain and no records of historical flooding have been recorded within the site. The EA Mapping website also indicates that the site does not lie within a Groundwater Source Protection Zone. There are no sites of national nature conservation interest (such as SSSI, NNR or LNR) within 2km of the site and no sites of European or international nature conservation interest (such as Ramsar, SPA, SAC) within 5km of the site. There are no Scheduled Ancient Monuments in close proximity to the site. The closest Scheduled Monument lies some 750m to the east of the site in the village of Haresfield ('The Mount Moated Site'). Planning Context The adopted Gloucestershire Waste Local Plan 2002-2012 (adopted October 2004) allocates (Policy 4) and safeguards (Policy 7) the site for waste management uses. The site is also identified as a strategic site capable of fulfilling a county-wide waste management role. The Local Plan indicates that the site could accommodate the following waste management options: Waste to Energy Recovery (WtE) , Materials Recovery Facility, Inert Recovery and Recycling, Metals Recycling, Household Waste Recycling Centre, Anaerobic Digestion, Waste Transfer Station, Composting The preferred areas, sites and area of search within the adopted Waste Local Plan represent the current waste site allocations for

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Gloucestershire. All of these allocations have been saved under transitional arrangements and will remain part of the Development Plan for Gloucestershire until formally replaced by the emerging Gloucestershire Minerals and Waste Development Framework. Gloucestershire County Council, who own the site, have indicated that the land is available for use as a location of a strategic waste management facility. Based upon the location, environmental setting, the context of the site within current planning policy, and the availability of the site for development, as detailed above, we would like to take this opportunity to register our support for the site to be identified for strategic waste management use within the Waste Core Strategy. Please do not hesitate to contact us should you require any further details or information to ensure that this site is considered for inclusion for strategic waste management use as part of the site allocation process of the Gloucestershire Waste Co-re Strategy.

4. Officer Response.

Support for Javelin Park noted.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

6. Please give a reason for your answer to Question 5.

Small to medium scale treatment facilities for municipal waste (i.e. with an annual throughput of 50,000 tonnes or less) could be accommodated within or in close proximity to these urban extensions to handle waste arising locally. This would accord with the proximity principle, which seeks to promote the management or disposal of waste as close as practicable to the point at which it is generated, and complement the provision of a strategic residual waste treatment facility located elsewhere within Gloucestershire.

6. Officer Response.

Support noted. The WCS has a role to play in ensuring all new development is underpinned by appropriate waste management infrastructure (e.g. recycling facilities). The site options consultation paper however focuses on identifying a site or sites suitable for accommodating a strategic waste management facility and there has been no interest from either waste operators or the developers leading the urban extensions in providing this type of facility as part of the development. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

Sites should be identified outside 'Zone C', within appropriate locations (and in accordance with the locational criteria set out in PPS 10 and RSS), where it can demonstrated that waste management activities at the locations would not cause significant detrimental impacts on the local area and the environment, or where these impacts can satisfactorily be mitigated against.

8. Officer Response.

Comments noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 132 Type OTH Name Alasdair Lawrence Organisation Complete Circle

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney	X		
3. Land at Lydney Industrial Estate, Lydney	X		

10. Please give a reason for your answers to Question 9.

The three sites identified outside 'Zone C' could potentially be suitable for either small scale waste treatment of in conjunction with the main strategic waste treatment facility (to be located within 'Zone C'), on the basis that they would provide local waste facilities in close proximity to the settlements of Cinderford, Cirencester, Coleford, Lydney, Stroud and Tewkesbury. These sites could act as local waste delivery points (such as Waste Transfer Stations) for waste collected within these areas, prior to onward transportation to recycling/composting facilities or to the main strategic waste treatment facility for treatment and recovery.

10. Officer Response.

Comments noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. These sites will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the sites forward as allocations at this stage does not mean that the sites are unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

We support this approach. Please refer to our answer to Question 10.

12. Officer Response.

Support noted. See previous response.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No further comments.

13. Officer Response.

Noted

14. Do you have any comments on the Executive Summary?

No further comments.

14. Officer Response.

noted

15. Do you have any comments on Section 1?

No further comments.

15. Officer Response.

noted

Number 132 Type OTH Name Alasdair Lawrence Organisation Complete Circle

16. Do you have any comments on Section 2?

No further comments.

16. Officer Response.

noted

17. Do you have any comments on Section 3?

No further comments.

17. Officer Response.

Noted

18. Do you have any comments on Section 4?

No further comments.

18. Officer Response.

Noted

19. Do you have any comments on the Sustainability Appraisal reports?

The Sustainability Appraisal Report appears to be comprehensive, and we agree with the headline sustainability objectives identified within the report.

19. Officer Response.

Support noted.

20. Do you have any comments on the Habitat Regulations report?

No further comments.

20. Officer Response.

Noted.

Number 375 Type IND Name Fiona Lawro Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I'm not sure/I don't know

2. Please give a reason for your answer to Question 1.

Waste treatment selection and sit selection possibly depend on each other i.e. a certain type of waste treatment may not be suitable for all sites. hard to decide without knowing which could possibly go where. However, many sites seem to be very close to large residential areas in Zone C which I am against

2. Officer Response.

Comment noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10 which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. In terms of proximity to residential areas, clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10 which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

Difficult to make a judgement on other areas as only copy of various sites with map and assessment info, was one of Wingmoor Farm, that could be taken home. Too

Number 375 Type IND Name Fiona Lawro Organisation not applicable/not provided

much info to consider at exhibition. It needs consideration at home. Putting any waste disposals near residential areas does smack of a lack of commom sense because of possible accidents which could affect residents/workers health, noise, increase in traffic, dirt, flies, seagulls etc. Wingmoor is supposedly at the end of its agreed life span and a battle is currently being fought to close it and its Toxix Waste. Here you are suggesting overiding that. Consideration to increased proposed residential build all around site i.e Swindon Village North

4. Officer Response.

Comment noted. Dealing with each point in turn. With regard to consultation material, in addition to copies being made available at the waste roadshows, all plans and site schedules were made available online and at all local libraries and District Council Offices. Copies were also made available on request. With regard to proximity to residential areas (existing and proposed), clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10 which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. In terms of health, PPS10 states that modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health. Furthermore, the detailed consideration of a waste process and the implications, if any, for human health is the responsibility of the pollution control authorities. PPS10 also states that, where concerns about health are raised, waste planning authorities should avoid carrying out their own detailed assessments rather they should ensure, through drawing from Government advice and research and consultation with the relevant health authorities and agencies, that they have any advice on implications for health. The WPA duly sought the advice from the PCT/NHS through the site options consultation. With regard to noise, dirt, flies and seagulls, these are detailed issues that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any sensitive receptors. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning conditions. Furthermore, it is important to note that the consultation relates to waste treatment and not disposal (landfill). Treatment facilities involve waste being delivered to enclosed buildings thereby reducing the potential for problems such as noise, odour, vermin etc. With regard to traffic impact, PPS10 ephasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. With regard to current operations at Wingmoor, the areas of Wingmoor Farm (East and West) currently used for landfill do not form part of this consultation and the operational status of these sites is also beyond the scope of the consultation.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

6. Please give a reason for your answer to Question 5.

unable to comment until outcome of RSS proposals which I am against

Number 375 Type IND Name Fiona Lawro Organisation not applicable/not provided

6. Officer Response.

Comment noted. The potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the Waste Core Strategy.

7. Do you support the identification of sites outside Zone C?

I'm not sure/I don't know

8. Please give a reason for your answer to Question 7.

Would need more information as to what would be needed to support what was selected for each site!

8. Officer Response.

Comment noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10 which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

unable to make decision without further info as I am unfamiliar with these areas

10. Officer Response.

Noted.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I'm not sure/I don't know

12. Please give a reason for your answer to Question 11.

unable to make decision without further info as I am unfamiliar with these areas

Number 375 Type IND Name Fiona Lawro Organisation not applicable/not provided

12. Officer Response.

Noted.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

no

13. Officer Response.

Noted.

Number 214 Type PC Name A Leaney Organisation Dursley Town Council

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Good communications network, particularly access to highways and rail

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X		X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre	X		
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park	X		
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			

4. Please give a reason for your answers to Question 3.

Suitable: Good size, location & level of impact on the surrounding area Not Suitable: Gloucester - too close to housing, poor impact on traffic, poor road network for HGV's. Don't Know: Easter Park & Javelin Park - proximity to residential areas/ impact on biodiversity. Netheridge STW - flooding issues but good support to existing technology.

4. Officer Response.

Support for sites (Wingmoor East, Wingmoor West, Quadrant, Moreton Valence, Nastend Farm, The Park) are noted. In terms of the comments relating to Site 7, Land North of the Railway Triangle, the site has not been taken forward into the Publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to

Number 214 Type PC Name A Leaney Organisation Dursley Town Council

be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the Publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

6. Please give a reason for your answer to Question 5.

We agree

6. Officer Response.

Support noted.

7. Do you support the identification of sites outside Zone C?

I do not support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

AONB plus the tonnage of waste produced per hectare is relatively low.

8. Officer Response.

Comment noted. With respect to facilities in the AONB, the WCS does avoid the allocation of strategic sites in the AONB but recognises the potential need for appropriate local facilities serving local waste management needs. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

N/A

10. Officer Response.

noted

11. Do you support the approach of using a combination of sites within and outside Zone C?

I do not support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

We would support a combination of site within Zone C but not to incorporate site outside of Zone C.

Number 214 Type PC Name A Leaney Organisation Dursley Town Council

12. Officer Response.

Comment noted. It is essential that the WCS provides a clear strategy setting out what will be built and where. This will provide certainty and confidence to the development industry and help bring proposals forward. The Council's preferred strategy is to focus the location of new strategic waste management facilities on the area defined as Zone C. This approach is considered to be consistent with national policy (PPS10) and the Regional Waste Strategy. Although the preferred focus for strategic waste management is Zone C, a number of other sites were identified outside this zone in the Forest of Dean and Cotswold District in order to provide suitable flexibility and support for the Zone C sites. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No

13. Officer Response.

Noted

14. Do you have any comments on the Executive Summary?

No

14. Officer Response.

noted

15. Do you have any comments on Section 1?

No

15. Officer Response.

noted

16. Do you have any comments on Section 2?

No

16. Officer Response.

noted

17. Do you have any comments on Section 3?

No

17. Officer Response.

Noted

18. Do you have any comments on Section 4?

There could have been a description of the technologies available and those most likely to be employed. There is a lot of discussion at the moment about incinerators and their negative impact.

18. Officer Response.

Number 214 Type PC Name A Leaney Organisation Dursley Town Council

Comment noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. It is important to noted that the type of technology chosen has no direct bearing on the delivery and implementation element of the WCS (the principles of which will apply regardless of which technology or technologies come forward).

19. Do you have any comments on the Sustainability Appraisal reports?

No

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

No

20. Officer Response.

Noted.

Number 113 Type LAC Name Vicki Leddington Organisation Northway Area Residents and

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

We do not need a waste site so close to housing and a petrol station! This will down value our houses, bring in awful smells and pests, such as seagulls,rats etc. It should be placed a good distance from properties.

2. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. Identifying sites in the more remote parts of the County would be inconsistent with national and regional policy as waste would have to travel further to be managed. With specific regard to odour and pests, these are matters that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any sensitive receptors. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning conditions. The effect of development, waste related or otherwise, on house prices, is outside the scope of the planning system.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X	X	
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester	X		
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works		X	
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

Wingmoor farm is already a landfill area. Also railway triangle is a prome area. NOT a housing estate.

4. Officer Response.

Number 113 Type LAC Name Vicki Leddington Organisation Northway Area Residents and

Support for Wingmoor Farm noted. The re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community. Support for Land North of the Railway Triangle is noted, but this site will not be taken forward as a strategic site allocation due to highways and access issues. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Disagree

6. Please give a reason for your answer to Question 5.

Surley the current site could have an incinerator placed there to reduce waste.

6. Officer Response.

Comment noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. With regard to the RSS, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

we do need to find a suitable location.

8. Officer Response.

Comment noted, howver, on balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney		X	
3. Land at Lydney Industrial Estate, Lydney			X

Number 113 Type LAC Name Vicki Leddington Organisation Northway Area Residents and

10. Please give a reason for your answers to Question 9.

1) Foss cross is away from housing and an ideal location

10. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should `provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, `with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the `proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. This site will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I do not support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

It should be in one location for simplicity

12. Officer Response.

Comment noted. The publication WCS identifies four strategic site allocations. Which of these comes forward will be largely dependent on the waste industry.

14. Do you have any comments on the Executive Summary?

Very informative

14. Officer Response.

Support noted.

17. Do you have any comments on Section 3?

Somewhere away from housing

17. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was

Number 113 Type LAC Name Vicki Leddington Organisation Northway Area Residents and

produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements.

Number 229 Type IND Name David Lee Organisation not applicable/not provided

17. Do you have any comments on Section 3?

In response to your request regarding suitable sites I wish to object to use of all 13 sites listed for possible waste treatment in Gloucestershire on the grounds that you have not identified which methods of treatment you will use and therefore how can one know if a site is suitable. In addition:- Any of these sites could be used for incineration, which I oppose. Incineration creates toxic fly ash residue which is dangerous and which has to be transported and buried creating a risk to nearby residents. This is unacceptable. I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. Not only do we not want to receive other county's waste to incinerate we should not send ours out of the county for others to incinerate. The long term costs to the taxpayer will be higher with incineration. Incinerators act as a disincentive to reduce, reuse and recycle. The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for use all to take responsibility for the disposal of the waste we create in our own areas. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. Large incinerators in other areas of the country are already deemed to be a mistake.

17. Officer Response.

Comments noted. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 230 Type IND Name Jill Lee Organisation not applicable/not provided

17. Do you have any comments on Section 3?

In response to your request regarding suitable sites I wish to object to the use of all 13 sites listed for possible waste treatment in Gloucestershire on the grounds that: Any of these sites could be used for incineration, which I oppose. Incineration creates toxic fly ash residue which is dangerous and which has to be transported and buried creating a risk to nearby residents. This is unacceptable. Toxic ash burial has got to stop! I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are rapidly being developed. The long term costs to the taxpayer will be higher with incineration, furthermore large incinerators in other areas of the country are already deemed to be a mistake. Incinerators act as a disincentive to the 3 Rs, reduce, reuse and recycle. We've been talking about the 3 Rs for years why aren't we doing it now?! The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for use all to take responsibility for the disposal of the waste we create in our own areas. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer.

17. Officer Response.

Comments noted. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 398 Type IND Name Tim Legge Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
2. Areas A, B & C at Wingmoor Farm West		X	

4. Please give a reason for your answers to Question 3.

My main concern is the impact that this development (should it go ahead) will have on the Cheltenham Clay Club. I am currently an active member of the club and use the facilities twice a week. My understanding is that no provision has been made within the consultation paper for the continuance of this activity. The club is one of the few facilities within reasonable travelling distant of Cheltenham: the closure would seriously impact my ability to enjoy this leisure pursuit locally. Cheltenham Clay Club has been operating for around 40 years. In that time the club has been proactive environmentally through landscaping, ongoing maintenance and planting of trees off the site. Additionally, my understanding is that there are other sites proposed and that some of these are better place for development as: - they have better access to major roads - several sites are currently vacant - located more centrally within the county Therefore I would like to register my desire that Wingmoor farm is NOT selected for expanded use.

4. Officer Response.

Comments noted. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the inclusion criteria for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that this site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 376 Type IND Name Hazel Lewis Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Zone C contains suitable sites for waste. Other sites should be considered to give flexibility

2. Officer Response.

Support for Zone C noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch			
4. Javelin Park, Haresfield	X		
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park	X		
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

Wingmoor Farm has housing nearby and has served its purpose. Residents should not be asked to put up with increased traffic smells and flies. The facility has been allowed to continue beyond the planned time.

4. Officer Response.

Comments noted. The areas of Wingmoor Farm (East and West) currently used for landfill do not form part of this consultation and the operational status of these sites is also beyond the scope of the consultation. In terms of the proximity of housing, clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. Noise and flies are matters that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any sensitive receptors. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning conditions. In terms of traffic, PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options

Number 376 Type IND Name Hazel Lewis Organisation not applicable/not provided

paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

This would give flexibility and spread the load through the county.

8. Officer Response.

Support noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney	X		

10. Please give a reason for your answers to Question 9.

1 - well away from dense population 2 - Infrastructure already in place away from dense population

10. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should `provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. These sites will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the sites forward as allocations at this stage does not mean that the sites are unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 376 Type IND Name Hazel Lewis Organisation not applicable/not provided

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

Number 377 Type IND Name John Lewis Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

The zone contains possible sites for waste, but other sites outside this zone could be considered

2. Officer Response.

Support for Zone C noted, and 3 other sites outside this zone were consulted on.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch			
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park	X		
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

These marked as suitable have, for the most part, adequate infrastructure in place, e.g. roads. The Wingmoor Farm sites have served their purpose and local residents should not be asked to continue having to put up with increased road traffic, dust, smells and flies. It should be noted that the Grundon open MRF should have ceased operating at the end of 2008 when the planning consent expire. The fact that this facility has been allowed to continue is not satisfactory.

4. Officer Response.

Comments noted. The areas of Wingmoor Farm (East and West) currently used for landfill do not form part of this consultation and the operational status of these sites is also beyond the scope of the consultation. Noise, dust and flies are matters that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any sensitive receptors. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning conditions. In terms of traffic, PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

Number 377 Type IND Name John Lewis Organisation not applicable/not provided

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

addtional sites outside zone C would give greater flexibility and 'spread the load' through the county

8. Officer Response.

Support noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney	X		

10. Please give a reason for your answers to Question 9.

1 a) Is well away from dense population and proper screening would lessen and effect on the surrounding countryside. 3 c) Infrastructure is already in place, away from dense population

10. Officer Response.

Comment noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. These sites will therefore not be taken forward into the proposed Publication WCS. It should be noted that by not taking the sites forward as allocations at this stage does not mean that the sites are unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

reasons stated earlier

12. Officer Response.

See previous response.

Number 369 Type IND Name R Lintott Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I am writing to voice my utter disgust over the proposed use of the clay club at wingmoor farm for waste treatment. Cheltenham & district clay club is a well Established shooting club and as far as I can see the only proposed site with a recreational activity already on it. It is my belief that it would be a real struggle to find new facilities of this standard. The club has spent many years getting the layout and the area right many trees have been planted (aprox 400 witch we are all encouraged to do in this climate). And there is a real lack of good quality already shooting grounds around. This area being on small roads will be seriously affected by the extra traffic where as other sites are located on or near main roads and many of these sites are already vacant.

17. Officer Response.

Comments noted. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the inclusion criteria for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from TBC and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of Tewkesbury Borough Council have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that this site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 37 Type IND Name Christopher Llewellyn Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

I am dismayed to hear that the County's Waste Core Strategy contains further plans involving sites in and around Wingmoor Farm, namely 3 areas of Wing moor Farm East, 3 areas of Wing moor Farm West and The Park at Wingmoor Farm West. As a resident of Bishop's Cleeve, I wish to protest against these plans, based on the following points: Traffic- the amount of heavy vehicles travelling to the current waste sites is already excessive. The noise from these vehicles can be troublesome, and on many occasions they appear to exceed the speed limits. This gives me concerns for the safety of all residents, particularly children and young adults in the area. The location of Wing moor Farm is far from central for the county. While it might be within the central "Zone C" it is far north. The extra carbon emissions generated by transporting the waste this far north is totally unacceptable, particularly in the knowledge of current climate change. I feel it would be more appropriate to have several smaller sites around the county, rather than one site for all. Access to Wingmoor Farm is not particularly good, with the nearest motorway access several miles away. This increases the risk of the heavy vehicles causing damage to smaller "local" roads (which were never designed to take such a burden), property and also greater chance of road traffic accidents as a result of the narrower roads and increased number of access roads off them. Other sites are more accessible to motorways and major highways, to tolerate greater quantities of heavy vehicles. Some of the other sites are already vacant, and would not require any businesses or clubs to move off. If some of the businesses nearby have to move, it could mean increased unemployment for our area. Wingmoor Farm West comprises land that is home to the Cheltenham and District Clay Club. This club has been running for many years, and a great deal of time and effort has been invested in making it one of the best clubs in the region. There have been in excess of 400 trees planted in that time to enhance the ground layout, and this cannot be easily replaced. It seems ludicrous to risk closure when so many of the other possible sites are currently vacant of any activities or businesses. The small area of Bishop's Cleeve has been the recipient of waste for many years. I feel that it has reached a point where the waste burden should now be carried by other regions. Dust from the current sites is problematic at times. Windows, external furniture and motor vehicles left uncovered always have a layer of dust on them, certainly when compared to sites not near a waste site. There is no way to know in advance the effects of any further waste developments. The potential effects on public health cannot be underestimated. I notice an increased number of flies, particularly in the summer months, than I have been used to when living elsewhere. I conclude this to be a result of the proximity of the current waste site. Further development in this region would further reduce the greenbelt land in the area. We do not know what technologies are being proposed, so cannot know if they are suitable for the purpose and area. I feel that Bishop's Cleeve has had its fair share of waste already. Alternative sites should therefore be considered in preference to any further development on Wingmoor Farm.

4. Officer Response.

Comments noted. Dealing with each in turn. PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. For the Wingmoor Farm sites, the assessment highlighted a likely net increase in traffic and potential capacity issues at some locations requiring probable mitigation such as junction improvements. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. Vehicular speed is not an issue for planning however. If vehicles are exceeding speed limits this is a matter for the police to deal with. Whilst the site is in the northern part of 'Zone C' it is in close proximity to Cheltenham which along with Gloucester is where most of

Number 37 Type IND Name Christopher Llewellyn Organisation not applicable/not provided

Gloucestershire's waste arises. Treating this waste as close to source as possible is consistent with national and regional policy. The site options consultation paper identified 13 sites, 10 in Zone C, 3 outside. It invited views on using a combination of sites explaining that provision could be made either on one large site, or a combination of smaller sites. The council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the county. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. The advantages and disadvantages would be investigated further during procurement process. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the 'inclusion criteria' for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that his site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations. Dust, along with noise and odour are matters that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any 'sensitive receptors'. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning conditions. In terms of health impact, PPS10, states that 'modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health'. Furthermore, the detailed consideration of a waste process and the implications, if any, for human health is the responsibility of the pollution control authorities. PPS10 also states that, where concerns about health are raised, waste planning authorities should avoid carrying out their own detailed assessments rather they should ensure, through drawing from Government advice and research and consultation with the relevant health authorities and agencies, that they have any advice on implications for health.' The WPA duly sought the advice from the PCT/NHS through the site options consultation. Whilst it is acknowledged that the Green Belt should generally be protected, PPS10, emphasises that local authorities should 'recognise the particular locational needs of some types of waste management facilities when defining detailed green belt boundaries and, in determining planning applications'. In line with PPS 10 companion guidance, should any sites within the Green Belt be specifically allocated within the Waste Core Strategy, it will need to be clearly indicated that they are for waste management purposes only. With regard to technology, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The

Number 37 Type IND Name Christopher Llewellyn Organisation not applicable/not provided

consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. In terms of existing waste operations, the re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community.

Number 365 Type ENV Name Richard Lloyd Organisation CPRE Gloucestershire Branch

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

This is the area closest to Gloucestershire's main centres of population and where most waste will arise. It benefits from good road accessibility and avoids sensitive landscapes and locations such as the Cotswolds AONB, Forest of Dean and the floodplain.

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X	X	
4. Javelin Park, Haresfield		X	
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence		X	
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West			

4. Please give a reason for your answers to Question 3.

In our view, every effort should be made to provide sites for the treatment of residual municipal waste (and other waste) within sites/locations already in use for waste disposal, waste management or related purposes. Opening up new waste treatment locations should be a last resort. At Wingmoor Farm East and West, we are aware of local concerns about the management of these extensive sites. Here, development of any waste treatment facilities should be linked to measures to improve transport links with the sites and the overall management of the Wingmoor Farm complex.

4. Officer Response.

Comment noted. The use of existing waste management facilities is consistent with national policy however, regard must be had to the cumulative effect of previous waste disposal facilities on the care and well being of the local community including any significant adverse impacts on environmental quality, social cohesion and inclusion or economic potential. The sites identified in the site options consultation paper included a mix of sites, mainly previously developed land or land with planning permission for development. This included several sites that accommodate existing waste management operations including Wingmoor Farm West and Wingmoor Farm East. In terms of transport links, PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. For the Wingmoor Farm sites the assessment identified a likely net increase in traffic and the need for potential capacity improvements in the local area. Any strategic site allocation made in the Publication WCS will be supported by development criteria including those relating to highways and transport. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan.

Number 365 Type ENV Name Richard Lloyd Organisation CPRE Gloucestershire Branch

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

6. Please give a reason for your answer to Question 5.

What CPRE has in mind is the development of modest combined heat and power plants in association with major development, extracting energy from waste. This would contribute to renewable energy targets and in our view would be a far better alternative to any large scale incineration for dealing with residual municipal waste.

6. Officer Response.

Support noted. The urban extensions do represent an opportunity to integrate waste management into the design and layout from the outset possibly including the generation of energy from waste and useable heat and power. However, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the Government's intention to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I do not support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

No sites outside Zone C should be entertained at this stage. In our view, there would seem to be ample scope for providing a satisfactory solution to the need to provide additional waste management facilities within areas already used for waste disposal/waste management purposes.

8. Officer Response.

Comment noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the proposed Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester		X	
2. Hurst Farm, Lydney	X		
3. Land at Lydney Industrial Estate, Lydney	X		

10. Please give a reason for your answers to Question 9.

1a Inappropriate as the site is within the Cotswolds AONB. 2a and 3a In response to Question 8 we have said that no sites outside Zone C should be entertained at this stage. In the longer term we consider that the two sites identified at Lydney could be suitable for the treatment of municipal waste arising locally, ie within Forest of Dean District, subject to environmental impacts being acceptable.

10. Officer Response.

Number 365 Type ENV Name Richard Lloyd Organisation CPRE Gloucestershire Branch

Noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. These sites will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the sites forward as allocations at this stage does not mean that the sites are unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I do not support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

This is not considered necessary. Repeating what we said in relation to Q8, there would seem to be ample scope for providing a satisfactory solution to the need to provide additional waste management facilities within areas already used for waste disposal/waste management purposes.

12. Officer Response.

Comment noted. See previous response.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No

13. Officer Response.

Noted.

14. Do you have any comments on the Executive Summary?

No

14. Officer Response.

Noted.

15. Do you have any comments on Section 1?

Gloucestershire's overall target for recyling and composting household waste (60% by 2020) is unambitious and has already been exceeded by Cotswold District Coucil. It also needs to be viewed against initiatives to reduce the overall amount of waste produced in the first place (despite a rising population and rising household numbers). It is notable that research for the National Assembly of Wales suggests that recycling rates of 90% could be achievable, that the Scottish Government is likely to commit to reducing household waste volumes by 1% a year and that the EU is likely to require Member States to produce Waste Prevention Plans. All this suggests that the total volume of residual household waste to be disposed of could be significantly less than 150,000 tonnes a year within a few years.

15. Officer Response.

Comment noted. When discussing waste issues some people believe that there is no need to produce any waste at all and that the Council should have a much higher recycling and composting target. Whilst the WDA will not be limited by the 60% target, it is also realistic in what can potentially be achieved. The exceptional performance of the Cotswolds in achieving the 2020 target in one step should not be a message that the 60% target will be easy. Gloucestershire has two large cities Cheltenham and Gloucester and in these urban areas it will be considerably more difficult to achieve a 60% recycling and composting rate. This is because of many factors including the fact that the two cities have more than 20,000 flats between them which do not readily lend themselves to collection system changes or high recycling rates, urban populations have traditionally recycled and composted less waste so there is more inertia to overcome to get the population to buy into new systems and over 30% of the Counties overall waste arises from these two urban areas and so the performance here will have a greater effect than in smaller populations. For these reasons the Council believes its target of at least 60% is a challenging one that will need many people getting involved in practising the 3Rs

Number 365 Type ENV Name Richard Lloyd Organisation CPRE Gloucestershire Branch

(reduce, re-use, recycle) to achieve it. Importantly, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire however needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces.

16. Do you have any comments on Section 2?

Policy W2 in the draft Regional Spatial Startegy adopts a sequential approach to the distribution of waste facilities. This approach is fully supported.

16. Officer Response.

Comment noted. It is the Government's intention to formally abolish the South West RSS. Importantly however, the evidence that informed the preparation of the RSS may still be considered a material consideration. Furthermore, despite the potential abolition of the RSS, local authorities are expected to continue to progress their own development plan documents including waste plans, with enough land being provided for waste management facilities to support the sustainable management of waste.

17. Do you have any comments on Section 3?

In identifying strategic waste sites - defined in the consultation paper as sites at least 2ha in size and able to handle at least 50,000 tonnes of waste a year - we argue that every effort should be made to utilise sites/locations already in use for waste disposal/waste management purposes. As noted above, we believe the amount of waste that needs to be handled can be reduced to below 150,000 tonnes a year by concerted action. In the light of the lower volumes that may need to be handled, it may be appropriate to consider sites below the 50,000 tonnes threshold.

17. Officer Response.

Comment noted. The re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community. Over 300 sites were initially identified for further investigation across the County. This included a number of sites already used or previously used for waste management. A number of these were subsequently included in the site options consultation paper. The 150,000 tonnes per annum estimate of residual municipal waste is based on the Council achieving its target of at least 60% recycling and composting by 2019/20. This is an ambitious target that exceeds the national target of 50% over the same period. If the Council does not achieve it's recycling and composting target of 60% the amount of residual municipal waste could be as higher. The 50,000 tonnes per annum threshold for defining a strategic site is considered appropriate in light of the above and having regard to other planned and existing municipal waste facilities in the UK, the definition of strategic in the Waste Local Plan (2004) and a number of studies on potential facilities requirements for different types of waste technologies. If smaller sites come forward these can be satisfactorily addressed through criteria-based policy within the WCS rather than a strategic site allocation.

18. Do you have any comments on Section 4?

No

18. Officer Response.

Noted.

19. Do you have any comments on the Sustainability Appraisal reports?

No

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

No

Number 365 Type ENV Name Richard Lloyd Organisation CPRE Gloucestershire Branch

20. Officer Response.

Noted.

Number 12 Type IND Name Alistair and Penny Lock and White Organisation

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch		X	
4. Javelin Park, Haresfield		X	
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence		X	
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works		X	
10. The Park, Wingmoor Farm West	X	X	

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester		X	
2. Hurst Farm, Lydney		X	
3. Land at Lydney Industrial Estate, Lydney		X	

17. Do you have any comments on Section 3?

We are writing to object to any form of incinerator on any of the 13 sites listed for possible waste treatment in Gloucestershire for the following reasons: Any of these sites could be used for incineration, which I oppose. Incineration creates fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. Incinerators act as a disincentive to reduce, reuse and recycle. The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. Large incinerators in other areas of the country are already deemed to be a mistake.

17. Officer Response.

Comments noted. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a

Number 12 Type IND Name Alistair and Penny Lock and White Organisation

shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 141 Type PC Name D Lord Organisation Whitminster Parish Council

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Council opposed concentration of waste processing at sites serving the county and would prefer to local centres serving local communities and not utilising mass incineration. Council considers the County Council's current approach to be short-sighted and ill judged in the light of the more modern and environmentally methods now becoming available and utilised elsewhere in the UK and Europe.

2. Officer Response.

Comment noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. With regards to the use of smaller, local sites outside Zone C, the site options consultation paper identifies 13 potential sites, 10 within Zone C, 3 outside Zone C. Views are invited on using a combination of different sites. The consultation makes it clear that whilst some of the sites are capable of providing a one-site solution, it may be that strategic waste management of municipal waste comes forward on several different sites. The council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the county. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. The advantages and disadvantages would be investigated further during procurement process.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X		
4. Javelin Park, Haresfield		X	
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence		X	
7. Land north of Railway Triangle, Gloucester	X		
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works		X	
10. The Park, Wingmoor Farm West			

Number 141 Type PC Name D Lord Organisation Whitminster Parish Council

4. Please give a reason for your answers to Question 3.

Council would prefer to see sites used for waste handling, of whatever process, to be concentrated on existing areas of contamination or dispersed on a small scale throughout the County.
****Additional comments made following additional consultation for Moreton Valence**** Council writes in response to Mr Phillip's letter of 5th July 2010 and wishes to object strongly to the above proposed site as being considered suitable through the Waste Core Strategy Site Options. Whitminster Parish is dissected by the A38 with the majority of its facilities situated on the opposite side of the road. Irrespective what directions or limits are applied any increased use of the above site would dramatically increase the number of heavy goods vehicles passing through the parish to the detriment of local residents. Further, Council would like to highlight a number of road traffic accidents that have occurred at the current entrance to the Moreton Valence Airfield site. Without significant changes to the road layout, speed limits and most likely the introduction of a full light controlled junction Council would argue that increased use of this access cannot come about without causing a significant reduction in road safety. It is for the above matters that this Parish Council wishes to object to any extended use of the above site.

4. Officer Response.

Comments noted. Although Government policy encourages the re-use of previously developed land, there is nothing to suggest that contaminated land should be prioritised. Whilst development on contaminated land provides the opportunity for remedial action to be taken there is of course a cost implication which in some cases can prevent development coming forward. In terms of the scale of development, the site options consultation paper identified 13 sites, 10 within Zone C and 3 outside. All sites were more than 2 hectares and capable of accommodating a facility processing at least 50,000 tonnes of waste per year. At this stage it is not known whether provision will be made through one large facility, or several smaller facilities. The council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the county. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. The advantages and disadvantages would be investigated further during procurement process.
****Response to additional comments made following additional consultation for Moreton Valence**** Having regard to all of the issues raised and taking particular account of likely deliverability and the need to manage waste close to source, it has been decided to take this site forward as a strategic site allocation within the Publication WCS. The Council is not however convinced of the need to extend the site as suggested by the landowner in response to the site options consultation in 2009. The area allocated in the Publication WCS is therefore the original site identified in the site options consultation in October 2009 and not the proposed site extension put forward in response to that consultation. This will allow for future operations to be more readily controlled than would be the case with a more extensive site. A full Transport Assessment will need to accompany any proposal for development. The TA should include a full assessment of the site access and routes to connect to the M5 at Junctions 12 and 13, and beyond to the wider principal road network. Contributions towards both maintenance and junction improvements along the transport routes to and from the site may be required. In particular improvements are likely to junction 12 to the M5 and on the more immediate principal road network such as the A38 and its junction with the B4008. The access junction from the A 38 to the site itself will likely require improvements due to its proximity to an existing junction on the western side of the A38 and an existing lay-by . It should be noted that the Highways Agency has programmed an improvement scheme for Junction 12 in 2010/11, but this does not preclude the requirement for the assessment of the impact of any development traffic upon the operation of the Junction.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

Number 141 Type PC Name D Lord Organisation Whitminster Parish Council

6. Please give a reason for your answer to Question 5.

Agree as waste treatment should be carried out on a small scale local to the communities producing the waste as is carried out in many other parts of Europe.

6. Officer Response.

Support noted. The WCS has a role to play in ensuring all new development is underpinned by appropriate waste management infrastructure (e.g. recycling facilities). The site options consultation paper however focuses on identifying a site or sites suitable for accommodating a strategic waste management facility and there has been no interest from either waste operators or the developers leading the urban extensions in providing this type of facility as part of the development. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

As referred to above, Council believes that waste should be processed on small local sites using methods that primarily avoid incineration and these should be distributed throughout the County and away from the flood plain.

8. Officer Response.

See previous response with regard to use of small local sites. With specific regard to flood risk, through the application of a Strategic Flood Risk Assessment (SFRA) floodplains have been avoided in the site selection process. Notwithstanding this, any proposal of more than 1 hectare in size would need to be supported by a site-specific Flood Risk Assessment (FRA).

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney		X	
3. Land at Lydney Industrial Estate, Lydney		X	

10. Please give a reason for your answers to Question 9.

Again, Council would prefer to see multiple sites throughout the County. If concentrating on one site. Council would suggest that Lydney is too remote to serve the majority of the County.

10. Officer Response.

Comments noted. It is acknowledged that Lydney would not be a suitable location for a one-site solution. The Council's preferred focus is Zone C. Sites outside Zone C are considered suitable for smaller scale facilities or supporting infrastructure such as waste transfer. On balance however, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. These sites will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the sites forward as allocations at this stage does not mean that the sites are unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

Number 141 Type PC Name D Lord Organisation Whitminster Parish Council

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

Council believes that many small sites should be dispersed throughout the whole County.

12. Officer Response.

Support noted. See previous response.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No

13. Officer Response.

noted

14. Do you have any comments on the Executive Summary?

Council opposes the principle of focusing the search primarily on Zone C. It believes more local solutions should be sought and facilities should be included in future development sites. More sites should be identified outside Zone C on a multi-site basis. Waste treatment should be close to the communities from where it is generated. Incineration should not be considered and other treatment processes should be considered more fully. Council believes the County Council has mishandled the process of considering future waste disposal and processing options and is taking forward the proposals with a lack of understanding, intelligence and knowledge of the side effects of incineration and the other options available.

14. Officer Response.

Comments noted. It is acknowledged that waste should be treated close to the communities in which it is generated. Importantly Gloucester and Cheltenham as the two largest urban areas are where most of Gloucestershires waste is generated. The proposed focus on Zone C reflects this fact and is consistent with national and regional policy as well as taking account of the fact that future growth in the County is likely to continue to focus on Gloucester and Cheltenham. On balance having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. With regard to incineration, at the present time the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.

15. Do you have any comments on Section 1?

NO

15. Officer Response.

noted

16. Do you have any comments on Section 2?

NO

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16. Officer Response.

noted

17. Do you have any comments on Section 3?

NO

17. Officer Response.

Noted

18. Do you have any comments on Section 4?

NO

18. Officer Response.

Noted

19. Do you have any comments on the Sustainability Appraisal reports?

NO

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

No

20. Officer Response.

Noted.

Number 225 Type IND Name Brian Love Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

choice of sites looks allright

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
4. Javelin Park, Haresfield	X		
6. Land at Moreton Valence	X		

4. Please give a reason for your answers to Question 3.

not heavily populated areas

4. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

7. Do you support the identification of sites outside Zone C?

I do not support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

not neccessary

8. Officer Response.

Comment noted. It is essential that the WCS provides a clear strategy setting out what will be built and where. This will provide certainty and confidence to the development industry and help bring proposals forward. The Council's preferred strategy is to focus the location of new strategic waste management facilities on the area defined as Zone C. This approach is considered to be consistent with national policy (PPS10) and the Regional Waste Strategy. Although the preferred focus for strategic waste management is Zone C, a number of other sites were identified outside this zone in the Forest of Dean and Cotswold District in order to provide suitable flexibility and support for the Zone C sites. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken

Number 225 Type IND Name Brian Love Organisation not applicable/not provided

forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

11. Do you support the approach of using a combination of sites within and outside Zone C?

I'm not sure/I don't know

Number 151 Type IND Name Wanda Lozinska Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
7. Land north of Railway Triangle, Gloucester		X	

17. Do you have any comments on Section 3?

I understand that you are collecting people's opinions on the Council's Waste strategy. I'd just like to say that I am not against having an incinerator in the area, but NOT in the centre of Gloucester. To have it in the railway triangle would be a criminal waste of a prime site, which should be made far better use of. Nor should it be a blot on the landscape, spoiling our beautiful countryside. I would favour placing it in an already industrialised area, preferably disguised behind a canopy of trees. Obviously, it should be subjected to the most stringent of environmental controls, with a number of fail safe systems, so that it would shut down should anything go wrong. We don't want the county poisoned by toxic fumes! Another point I would like to make, is the possibility of linking the incinerator up to some sort of power generation system, whereby the burning of waste would not only save the burning of fossil fuels but provide cheap power as well. Perhaps some waste could be turned into fuel bricks for industries or perhaps the hospital to burn as fuel. I do feel that we should make the most of the resources left on this earth, and cut pollution / emissions to an absolute minimum.

17. Officer Response.

Comments noted. Dealing with each in turn. It is important to note that the Council is currently technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. In terms of location, clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. With regard to Site 7, Land North of Railway Triangle, the site has not been taken forward into the publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that

Number 151 Type IND Name Wanda Lozinska Organisation not applicable/not provided

the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the Publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 282 Type IND Name D J Luckett Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Makes sense to focus on sites in region of greatest inhabitation to minimise road travel.

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X	X	
10. The Park, Wingmoor Farm West			

4. Please give a reason for your answers to Question 3.

Wingmoor extensions seem logical. Ashchurch site would appear to be too near to residential properties. I have no knowledge of the suitability or otherwise of the other locations.

4. Officer Response.

Support for Wingmoor Farm sites noted. In terms of Ashchurch (Easter Park) clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. Notwithstanding the above, the site has not been taken forward into the Publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

6. Please give a reason for your answer to Question 5.

Number 282 Type IND Name D J Luckett Organisation not applicable/not provided

The amount of housing proposed in the RSS, if fully implimented, will have a dramatic effect on waste disposal. Given that the area for building will centralise on Gloucester and Cheltenham, there will be little scope to incorporate waste treatment facilities in what will be a huge residential area.

6. Officer Response.

Comment noted. Provided it was planned from the outset there could be scope to incorporate waste treatment facilities into the urban extensions if they were to come forward. The companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development'. Potentially therefore waste facilities could co-exist with other types of development within the urban extensions. Treating waste at Gloucester and Cheltenham, which is where most of Gloucestershire's waste is generated, would be consistent with national and regional policy. Significantly however, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the Government's intention to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I do not support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

We should restrict site location to areas within Zone C.

8. Officer Response.

Comment noted.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

See answer to Q8. In any case, I am not familiar with these 3 areas.

10. Officer Response.

Noted. See previous response.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I do not support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

Q8 answer refers.

12. Officer Response.

See previous response.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

Number 282 Type IND Name D J Luckett Organisation not applicable/not provided

No

13. Officer Response.

Noted

14. Do you have any comments on the Executive Summary?

No

14. Officer Response.

noted

15. Do you have any comments on Section 1?

No

15. Officer Response.

noted

16. Do you have any comments on Section 2?

No

16. Officer Response.

noted

17. Do you have any comments on Section 3?

No

17. Officer Response.

Noted

18. Do you have any comments on Section 4?

No

18. Officer Response.

Noted.

19. Do you have any comments on the Sustainability Appraisal reports?

No

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

No

20. Officer Response.

Noted.

Number 1 Type IND Name M D Lumsdon Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch		X	
4. Javelin Park, Haresfield		X	
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence		X	
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works		X	
10. The Park, Wingmoor Farm West	X	X	

17. Do you have any comments on Section 3?

I write to object to the use of all 13 of the sites listed for possible waste treatment in Gloucestershire on the grounds that: Any of these sites could be used for incineration, which I oppose. Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. The long term costs to the taxpayer will be higher with incineration. Incinerators act as a disincentive to reduce, reuse and recycle. The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. Large incinerators in other areas of the country are already deemed to be a mistake.

17. Officer Response.

Comments noted. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward

Number 1 Type IND Name M D Lumsdon Organisation not applicable/not provided

elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 306 Type CCLLR Name Sarah Lunnon Organisation County Councillor

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

I accept the principle of locating waste management sites close to waste arisings, the locating of sites around only Gloucster and Cheltenham means that waste from the Cotswolds and the Forest has to travel to be processed. In relation to the Forest of Dean it leaves waste management vulnerable to road closure or damage. While sites should be sited in Zone C, other sites should also be identified.

2. Officer Response.

Comment noted. Gloucester and Cheltenham is where most of Gloucestershire's waste originates. Treating this waste close to source will reduce the amount of 'waste miles' travelled and is consistent with national and regional policy. The council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed). However GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement process all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the county. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. The advantages and disadvantages would be investigated further during procurement process. The site options consultation identifies three sites outside Zone C. Other sites outside Zone C were included in an initial long-list of sites but subsequently dropped for reasons such as site size, location, availability, flood risk and highways. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS,national policy and any other material considerations.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch			
4. Javelin Park, Haresfield		X	
5. Land adjacent to Quadrant Business Centre	X		
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester	X		
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

Sites 1,2, and 10 have serious concerns regarding the operators ability to abide by environmental legislation. There have been numerous complaints from residents

Number 306 Type CCLLR Name Sarah Lunnon Organisation County Councillor

regarding dust not being managed properly. This would suggest that the operator is not suitable to operate such a facility and is not a 'good neighbour' in planning terms. Javelin Park is one of 3 sites in the county suitable for a large scale wind farm. To meet its 2010 Sustainable Energy commitment this site should be ear-marked for a wind farm.

4. Officer Response.

Comment noted. The areas of Wingmoor Farm (East and West) currently used for landfill do not form part of this consultation and the operational status of these sites is also beyond the scope of the consultation. Any issue of planning conditions not being met is for the Council's Planning Enforcement team to investigate. Compliance with any waste management licence for the site is the role and responsibility of the Environment Agency (EA). With regard to Javelin Park there are no known proposals for a wind farm in this location. The site has planning permission for employment use, comprises previously developed land and has previously been allocated for waste in the Waste Local Plan (2004).

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Agree

6. Please give a reason for your answer to Question 5.

Many waste treatment technology has the ability to provide benefits in the form of energy generation, whether biofuel, electicity or combined heat and power. There are example of local authorities providing cheap heat as a means economic regeneration. It would seem wise to make use of any prposed development to provide the most environmentally low-cost solution to processing waste. New build could also provide community composting and specific business areas aimed at enterprises that use re-cycled materials. It is important that land use, energy and waste are joined up and not seen as seperate policy strands.

6. Officer Response.

Support noted. The proposed urban extensions present the opportunity to effectively incorporate waste treatment into the design and layout of the development from the outset. This would create the potential to use locally generated heat and power, recovered through the waste treatment process. However, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the intented abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

See answer to question 1. The provision of a number of small sites operating the most environmentally benificially technologies would provide a flexible solution to a changing waste stream. Enabling disposal to keep pace with a reducing waste stream (see landfill tax figures from Inland Revenue showing a year on year reduction in waste arisings)

8. Officer Response.

See response to Question 1. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS,national policy and any other material considerations.

Number 306 Type CCLLR Name Sarah Lunnon Organisation County Councillor

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

Am not familar with these sites so can't comment. However the geographical cover would seem to be sensible.

10. Officer Response.

Comment noted.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

See answer to 1 and 8.

12. Officer Response.

See previous responses.

Number 289 Type LAC Name Elaine MacTiernan Organisation Northway Area Residents and

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

The RSS has not been approved and ratified. Indeed, we have been promised that in the event of a change in government next year, it will be thrown out. However, even if this is the case, the JCS is proposing large new housing developments within Zone C, specifically at Ashchurch, Bishops Cleeve and Uckington. Waste sites should not be located within urban areas as they will have a detrimental effect upon house sales and prices and will put pressure on infrastructure that is already inadequate, for example drainage and traffic congestion.

2. Officer Response.

Comment noted. The South West RSS will be potentially abolished. Importantly however, the evidence that informed the preparation of the RSS may still be considered a material consideration. Furthermore, despite the potential abolition of the RSS, local authorities are expected to continue to progress their own development plan documents including waste plans, with enough land being provided for waste management facilities to support the sustainable management of waste. Notwithstanding this, the proposed focus on Zone C is consistent with national policy and the regional waste strategy. With regard to impact on urban areas, clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. The effect of development, waste related or otherwise, on house prices, is outside the scope of the planning system. Drainage is a detailed matter that would be assessed should a detailed proposal come forward. The use of sustainable drainage systems can often mitigate the impact of development on surface water run-off for example. In terms of traffic congestion, PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by development criteria including those relating to transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch		X	
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X

Number 289 Type LAC Name Elaine MacTiernan Organisation Northway Area Residents and

8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

We can only comment on Site 3 option with any intelligent opinion and to a small extent on sites 1, 3 and 10. The other options are not known to us and therefore we cannot give a considered and realistic answer. Sites 1, 3 and 10 at Wingmoor already have problems with adverse public opinion from residents in Bishops Cleeve and Stoke Orchard. We do not believe that the road system in the immediate area can cope with an increase in traffic and any encroachment into the Green Belt is unacceptable. Site 3 is the old Dowty Mining and Seals site which historically has had a big problem with pollution. There is a water course that flows above ground towards the site and below ground through the site, discharging into the Tirlebrook through a culvert under the A46. This stretch of road also floods frequently and in July 2007 was impassable, cutting off any travel between Tewkesbury, the M5 and Northway, Ashchurch, and the A46 towards Evesham. There is existing housing in very close proximity and, if the JCS proposals go ahead, at least 2,000 more homes will be built in Ashchurch. Site 3 is also adjacent to a busy Trading Estate. This area has suffered enough with the floods of 2007 and continuing lack of flood alleviation measures and drainage problems. Many businesses in this area have closed and the residents and businesses of Tewkesbury, Northway and Ashchurch are working hard to regenerate our town which has suffered more than most following the floods and in the current economic climate. This site is valuable land which, if properly developed, will help our regeneration and could provide an excellent opportunity for a large retailer to locate here. We are already working to attract businesses to the area. If GCC elect to put a waste plant here then we would have no hope of improving the area and, in fact, stand to lose many of the businesses that currently occupy the adjacent trading estate. In short, a waste site here would be disastrous to our economy, employment and standard of living. A further, but no less important consideration, is the question of saleability of property in the area. Any search on a home or business premises in Northway will bring up a waste site within a given radius. This will affect any sale and devalue our property. Many homeowners in Northway have suffered insurance increases, property devaluation and purchaser objection due to the 2007 floods; it is outrageous that GCC should put further hardship on us all. Northway is designated a deprived area and we residents are trying very hard to change that and improve this area. We believe that waste site at this location will be the final nail in our coffin and we will take all possible measures to prevent it.

4. Officer Response.

Comments noted. Dealing with each in turn. Current public opinion concerning existing waste operations at Wingmoor Farm (which are largely focused on disposal through landfill) is outside the scope of this consultation, which focuses on identifying appropriate sites for residual waste treatment. The re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community. In terms of traffic impact, PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. In terms of development within the Green Belt, whilst it is acknowledged that the Green Belt should generally be protected, PPS10, emphasises that local authorities should 'recognise the particular locational needs of some types of waste management facilities when defining detailed green belt boundaries and, in determining planning applications'. In line with PPS10 companion guidance, should any sites within the Green Belt be specifically allocated within the WCS, it will need to be clearly indicated that they are for waste management purposes only. With regard to the comments concerning Easter Park, the Council is aware of the culvert running through the site. With regard to the issue of pollution, PPS10, states that 'modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health'. The planning and pollution control regimes are separate but complimentary. Pollution control is concerned with preventing pollution

Number 289 Type LAC Name Elaine MacTiernan Organisation Northway Area Residents and

whilst planning controls the development and use of land. Waste planning authorities are expected to work on the assumption that the relevant pollution control regime will be properly applied and enforced. In terms of flood risk, the flood risk assessment undertaken in support of the site options consultation demonstrates that the site is in a low risk Flood Zone 1. Notwithstanding this, if any proposal of more than 1 hectare were to come forward, this would need to be supported by a site-specific Flood Risk Assessment (FRA). In terms of proximity to housing, clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. In terms of the site being used for other purposes to assist with the regeneration of the area, it is important to note firstly that the site owner is willing to consider waste management on the site and secondly that waste management itself can have economic benefits in terms of job creation and re-using previously developed land. Retail policy is outside the scope of the WCS however in broad terms, a retail use in this location would be contrary to the sequential approach advocated in Government policy which requires new shops to be located in town centres first before sites away from the town centre are considered. There is nothing to suggest that waste management facilities cannot co-exist with industrial development indeed they are acknowledged as compatible in national policy. The effect of development, waste related or otherwise, on house prices, is outside the scope of the planning system. Notwithstanding the above, since the site options consultation was undertaken in October 2009 and following discussions with the landowner it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on the Easter Park site. For this reason, it has been decided that this site will not be taken forward into the Publication WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Disagree

6. Please give a reason for your answer to Question 5.

We strongly disagree with the RSS and we formed part of the 35,000+ objections to it. We are concerned however, that even if it is thrown out, the JCS (Cheltenham Borough, Tewkesbury Borough and Gloucester City) are following Government and RSS guidelines in spite of huge public objection. It has been made clear that we don't want the level of housing increase that the RSS proposes. We believe that the need has not been proven and that the infrastructure will not support it. We understand the need to plan for the future but it must be done with restraint and sensibility. Incorporating waste sites into the RSS's proposed urban extensions is undemocratic and will exacerbate our current situation in areas around Tewkesbury which already have huge flooding, pollution and drainage issues.

6. Officer Response.

Comment noted. The Government's decision to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

8. Please give a reason for your answer to Question 7.

Number 289 Type LAC Name Elaine MacTiernan Organisation Northway Area Residents and

Question 7 assumes that the decision has already been made by GCC that the major waste site(s) will be located within Zone C. On Page 27 of the Consultation Document, you state that it is your preferred strategy, not that it has already been decided. If the decision has already really been made, then what is the point of this Public Consultation?

8. Officer Response.

Comment noted. As stated at Paragraph 3.27 of the site options consultation paper, Our preferred strategy is to focus the search for strategic municipal waste sites primarily on the area we have defined as Zone C. The purpose of the consultation was to see if the public / interested parties agreed with this approach. If, through responses to the consultation, there was a clear consensus from stakeholders including statutory consultees, Government Office etc that our approach was wrong, then the Council would need to re-appraise this preferred strategy. Notably 50% of respondents supported the Zone C focus. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

We have no knowledge of the sites in question 9 and are, therefore, unable to comment. Hopefully, people local to the areas listed will be able to provide answers.

10. Officer Response.

noted

12. Please give a reason for your answer to Question 11.

See answer to question 8. Is the GCC asking questions in a way that leads the public to give answers that you want?

12. Officer Response.

See previous response.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

NO

13. Officer Response.

Noted

14. Do you have any comments on the Executive Summary?

We would like to see a more considered approach rather than a blind leading the blind course of action following a failing government's guidelines and a government appointed Regional Strategy draft policy which is by no means going ahead.

14. Officer Response.

Comment noted.

Number 245 Type PC Name Ian Mackenzie Organisation Innsworth Parish Council

17. Do you have any comments on Section 3?

I write on behalf of Innsworth Parish Council to object to the use of all 13 of the sites listed for possible waste treatment in Gloucestershire on the grounds that: Any of these sites could be used for incineration, which the Council opposes. Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. The long term costs to the taxpayer will be higher with incineration. Incinerators act as a disincentive to reduce, reuse and recycle. The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. Large incinerators in other areas of the country are already deemed to be a mistake.

17. Officer Response.

Comments noted. Dealing with each in turn. The Council is currently technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. Following the decision by Defra in October 2010 to withdraw Gloucestershire County Council's Private Finance Investment (PFI) credits (worth £92million), the council is currently carrying out a strategic review of the project. The outcome from the review will be considered by Cabinet in February 2011. Ultimately Gloucestershire County Council has to find an alternative to landfill. Doing nothing is not an option. The contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Research shows that PFI helps deliver projects on time and on budget more effectively than other types of procurement. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly (amortising cost over shorter period) and therefore being unaffordable or there would be a balancing payment on contract expiry. It should not be assumed that economies of scale mean an inflexible solution. GCC recognises that regardless of the type of solution proposed, it is important that the solution must be able to cope with changes in waste volumes and composition, as it is inevitable such changes will happen. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability or a reduced cost to the authority. Waste management and the move away from landfill are driven by the Climate Change agenda. Climate change is a wider issue which the development of this solution can positively contribute. Carbon footprint is assessed as part of the life cycle analysis. DEFRA have commented on this issue directly by stating: The plans could also make an important contribution to the drive to tackle climate change by delivering estimated net carbon savings of 33,800 tonnes in 2020, compared to the current arrangements, or 64,700 tonnes if the final technology solution includes combined heat and power.

Number 408 Type BUS Name Kirsty Maguire Organisation Robert Hitchins Ltd.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
8. Nastend Farm, Stroudwater Business Park		X	

4. Please give a reason for your answers to Question 3.

Nastend Farm, Stroudwater Business Park is a sloping site and access into it would have to be off Brunel Way as Nastend Lane is not suitable. Therefore this would include further land not shown on the plan on page 44 which may not be in the control of the County Council. Consequently Nastend Farm, Stonehouse Business Park is not suitable for a strategic waste site.

4. Officer Response.

Comments noted. With regard to topography, although the site slopes this does not prevent development. Clearly the allocation of the site for employment use in the Stroud District Local Plan demonstrates that an independent Planning Inspector considered the site suitable for development. In terms of site access, the site is owned by the County Council. As far as the WPA is aware, the point of access off Brunel Way is also County Council owned / controlled. However, the Waste Planning Authority has carefully considered all the issues on this site. Since the site options consultation was undertaken in October 2009 and following discussions with the County Council as Waste Disposal Authority, there is significant uncertainty over the prospect of delivering a strategic waste management facility on this site. For this reason, it has been decided that this site will not be taken forward into the Publication WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

6. Please give a reason for your answer to Question 5.

The emerging Gloucestershire Waste Core Strategy should be in general conformity with the Secretary of State's proposed changes to the RSS and provide for the urban extensions to Cheltenham and Gloucester. The need for incorporating waste treatment facilities should be on a site by site basis including evidence demonstrating whether a facility is required.

6. Officer Response.

Comment noted. The potential aboloition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
2. Hurst Farm, Lydney			X

10. Please give a reason for your answers to Question 9.

Although Robert Hitchins Ltd is supportive of the location of Hurst Farm Lydney as a potential site for a waste treatment or waste transfer facility we are concerned that there is currently not enough information available to make a thorough judgement on the credentials of the proposal. There is no information as to the size of the site required as there is for the sites within Zone C. Therefore more information needs to be provided on the amount of land required and the specific use necessary on the site. As a point of clarification the site description of Hurst Farm, Lydney on page 66, refers to a mixed allocation and the site including a small industrial estate at Hurst Farm. This site is allocated for employment uses under Policy (R) F. Lydney 7 in the Adopted Forest of Dean Local Plan and does not include the small industrial estate at Hurst Farm. Also, the boundaries of the site on page 66 differ to the allocated site as shown on the Local Plan Proposals Map.

10. Officer Response.

Number 408 Type BUS Name Kirsty Maguire Organisation Robert Hitchins Ltd.

Robert Hitchins Ltd initially indicated that the land was available. This is the reason it was included in the WCS Site Options consultation. The Waste Planning Authority accepts that further clarification on a number of detailed matters is needed. Comment concerning employment allocation of the site noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. This site will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 318 Type IND Name Margaret Maisey Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I write with respect to the above policy to register my objection to the use of any of the proposed sites for the building of incinerators. I am opposed to the incineration of waste. I believe it creates a toxic fly ash residue which is dangerous to health and which has to be transported and buried, all of which activities are potentially hazardous to health. I believe that there are much more effective and safer alternatives for the disposal of waste available to us today. I also believe that, over the next few years, many more options will emerge, not only for the disposal of waste but for alternative materials so that there may be no necessity for incineration to anything like the same extent that is presently envisaged. Any local solution that incorporates incineration as part of the way of disposing of waste will by its very nature require a far greater input of waste being brought into the area to ensure incineration is financially viable. The additional traffic load will be harmful in waste products, in additional costs, will damage the local environment, and would alter the pastoral nature of our area. I believe that in using a solution to the problem of waste which includes incineration, this will, in some policy-makers minds; reduce the necessity of reducing the production of waste. The notion of huge, unattractive incinerators placed in the green land around towns is very sad and I would be very sorry to leave such reminders of our failures for future generations. Please think again. There are other ways to solve this problem.

17. Officer Response.

Comments noted. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. Issues such as additional traffic and potential environmental damage have been investigated in detail through the extensive site allocation process.

Number 283 Type IND Name Fran Manley Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Zone C at Easter Park is surrounded by housing on 3 sides of the proposed development. i.e. Northway, Ashchurch & Newtown.

2. Officer Response.

Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. Notwithstanding the above, since the site options consultation was undertaken in October 2009 and following discussions with the landowner it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. For this reason, it has been decided that this site will not be taken forward into the Publication WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS national policy and any other material considerations.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X	X	
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West			

4. Please give a reason for your answers to Question 3.

Wingmoor Farm already has a Waste development. Likewise the Netheridge Sewage Treatment works has a development already. Easter Park, Ashchurch is too close to houses of Newtown, Ashchurch and Northway.

4. Officer Response.

Support for Wingmoor Farm sites and Netheridge noted. Please also see response to Q2.

Number 283 Type IND Name Fran Manley Organisation not applicable/not provided

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

6. Please give a reason for your answer to Question 5.

They should at least be considered.

6. Officer Response.

Support noted. However, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

All areas should be considered and those with least populated areas should be short listed.

8. Officer Response.

Comment noted. Please see response to Q2.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

I do not know the areas.

10. Officer Response.

Noted.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I do not support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

Because it will spread the contamination to several areas rather than just on area.

12. Officer Response.

Comment noted. PPS10 states that 'modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health'.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No.

Number 283 Type IND Name Fran Manley Organisation not applicable/not provided

13. Officer Response.

Noted

14. Do you have any comments on the Executive Summary?

It is amazing, no disgusting, that the local residents have not been written to about the proposed development. Is Glos Council working for the general public in the county or are they just working for themselves, without looking after the residents wellbeing.

14. Officer Response.

Comment noted. Residents and businesses within approximately 250m of each of the 13 sites were written to in advance of the consultation and advised of the possibility of a site near them being identified. Around 2,000 letters were sent out. These residents and businesses were then written to again once the consultation had started inviting them to participate. In addition a series of roadshows were held near each site to allow people to view relevant material and speak to Officers first hand.

15. Do you have any comments on Section 1?

You say this consultation is not about waste issues in general. Well, it should be as it affects many people in the vicinity of which ever site you decide upon.

15. Officer Response.

Comment noted. The site options consultation was focused on identifying suitable sites for the treatment of residual municipal waste. The publication WCS will have a broader remit and will seek to address all relevant waste issues in Gloucestershire where these relate to the use of land.

16. Do you have any comments on Section 2?

The problem you are making is that many industrial areas are now on the outskirts of towns and that a developer then is allowed to build dwelling houses adjacent to these sites by the local council. Until you stop developers building next to industrial sites or vica versa, then using old derelict industrial sites for this waste programme, you will always come up against opposition from local residents. How would the councillors like a waste development in their back yard?

16. Officer Response.

Comment noted. Please see response to Q2.

17. Do you have any comments on Section 3?

The document in page 35 states "There are residential properties and businesses within 250 metres". This must be too close from a health worry point of view for the Easter Park site.

17. Officer Response.

Comment noted. Please see response to Q2.

18. Do you have any comments on Section 4?

None

18. Officer Response.

Noted.

19. Do you have any comments on the Sustainability Appraisal reports?

I might if I could find the Reports you are referring to.

19. Officer Response.

The SA Reports were available with all the other consultation documents on the Council's website, at all District Council Offices and local libraries and on request. An

Number 283 Type IND Name Fran Manley Organisation not applicable/not provided

executive summary report was produced alongside the main report for ease of reference.

20. Do you have any comments on the Habitat Regulations report?

I might if I could find the Reports you are referring to.

20. Officer Response.

Comment noted. The HRA Screening Report was available with all the other consultation documents on the Council's website, at all District Council Offices and local libraries and on request.

Number 11 Type IND Name Veronica L Mansfield Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I have followed closely recent Nation-wide debates on waste disposal by incineration. Also I have studied the 4th report of the British Society for Ecological Medicine, Second Edition June 2008 on the Health Effects of Waste Incineration, and concur entirely with the irrefutable findings therein. Consequently I now write to object to the use of all 13 of the sites listed for possible waste treatment in Gloucestershire on the grounds that: Any of these sites could be used for incineration, which I vehemently oppose. The combustion process will produce levels of pollutants such as dioxins, furans and toxic heavy metals. Claims that these will be controlled to acceptable levels are worthless and cannot be substantiated. Exhaust after treatment is never totally safe. Incineration creates fly ash residue which is toxic and dangerous; and which has to be transported from the site of incineration and buried elsewhere, creating a risk to nearby residents which is unacceptable. It is understood that incineration contracts would be for, at least, 24 years, thus locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies currently being urgently developed Incinerators act as a disincentive to reduce, reuse and recycle. The sites presently considered are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste, and the need for us all to take responsibility for the disposal of the waste we create in our own areas. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use, and is better for the environment and for the taxpayer. There is conclusive evidence to show that large incinerators in other areas of our country are already deemed to be a costly mistake. I have yet to find a single resident of Haresfield who does not oppose the idea of locating an incinerator at Javelin Park. This hill side area is directly in the path of prevailing winds passing over the site being considered and harmful fallout here would be an inevitable consequence. I refer you also to our joint e-mail dated 27th November 2007 addressed to leader@gloucestershire.gov.uk

17. Officer Response.

Comments noted. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 31 Type IND Name Gordon W Mansfield Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I have followed closely recent Nation-wide debates on waste disposal by incineration. Also I have studied the 4th report of the British Society for Ecological Medicine, Second Edition June 2008 on the Health Effects of Waste Incineration, and concur entirely with the irrefutable findings therein. Consequently I now write to object to the use of all 13 of the sites listed for possible waste treatment in Gloucestershire on the grounds that: Any of these sites could be used for incineration, which I vehemently oppose. The combustion process will produce levels of pollutants such as dioxins, furans and toxic heavy metals. Claims that these will be controlled to acceptable levels are worthless and cannot be substantiated. Exhaust after treatment is never totally safe. Incineration creates fly ash residue which is toxic and dangerous; and which has to be transported from the site of incineration and buried elsewhere, creating a risk to nearby residents which is unacceptable. It is understood that incineration contracts would be for, at least, 24 years, thus locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies currently being urgently developed. As a now retired professional mechanical engineer with long experience involved in reducing NOX and particulate emissions in diesel engines; I am well aware of the time and cost involved. The long term costs to the taxpayer will be disproportionately higher with incineration. Incinerators act as a disincentive to reduce, reuse and recycle The sites presently considered are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste, and the need for us all to take responsibility for the disposal of the waste we create in our own areas. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use, and is better for the environment and for the taxpayer. There is conclusive evidence to show that large incinerators in other areas of our country are already deemed to be a costly mistake. I have yet to find a single resident of Haresfield who does not oppose the idea of locating an incinerator at Javelin Park This hillside area is directly in the path of prevailing winds passing over the site being considered and harmful fallout here would be an inevitable consequence. I refer you also to my e-mail dated 27th November 2007 addressed to leader@gloucestershire.gov.uk

17. Officer Response.

Comment noted. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 159 Type IND Name David Manzi-fe Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
4. Javelin Park, Haresfield		X	

17. Do you have any comments on Section 3?

I write to object to the use of all 13 sites listed for possible waste treatment in Gloucestershire, especially the site at Javelin Park, Haresfield. It is possible that any of these sights could be used for incineration, a process I oppose because it creates toxic ash residue, which later has to be transported away and buried - this of course creates health risk to nearby residents both on the site of the incineration and also the site of burial. Large incinerators like those proposed are already deemed a mistake in other parts of the country.

17. Officer Response.

With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 382 Type IND Name David Marland Organisation not applicable/not provided

17. Do you have any comments on Section 3?

With regard to Gloucestershire County Council, undertaking to select a new waste site from one of ten options. I write to object against the possible use of Area C at Wingmoor Farm East, The Park, Stoke Orchard, Cheltenham. Which has been used over the past 40 years as a clay pigeon, shooting ground by Cheltenham & District Clay Club. This club has an active membership of over 200 people, the work that has been put in over this time could simply not carried out again, there is no other possible alternative site for this type of shooting ground anywhere near this location. One would think that to even consider this site would be a very serious mistake, with the objection already by thousands of people to the Wingmoor waste sites, in this area. From a personal point of view, I would loose the use of this excellent shooting ground, on which I practice my shooting to represent Great Britain at National & International level, I am a former world Champion & current European Champion so the loss of this facility would be very important to me. So please I implore you use one of the other sites, which are not being used for anything at all.

17. Officer Response.

Comments noted. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the inclusion criteria for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that this site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 299 Type IND Name J Marsden Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I write to object to the use of all 13 of the sites listed for possible waste treatment in Gloucestershire on the grounds that: Any of these sites could be used for incineration, which I oppose. Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried, creating a risk to nearby residents which is unacceptable. I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer, more efficient and effective technologies which are being rapidly developed. The long term costs to the taxpayer will be higher with incineration. Incinerators act as a disincentive to reduce, re-use and recycle. The sites are not evenly distributed around the county, giving too little weight to the negative aspects of transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas. Mechanical Biological Treatment (including anaerobic digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. Large incinerators in other areas of the country are already deemed to be a mistake. I cannot imagine that anyone in their right mind would consider installing an incinerator anywhere, in this day and age, when we are trying so hard to protect our precious environment.

17. Officer Response.

Comments noted. Dealing with each in turn. The Council is currently technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. The contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. In terms of incineration acting as a disincentive to recycling, GCC will be procuring a solution that aligns with its recycling and composting objectives. Tonnages are based on achieving 60% recycling capacity and are reviewed regularly using the most up to date figures. 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling as reality proves the contra argument. With regard to the distribution of sites, the council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the county. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. The advantages and disadvantages would be investigated further during the procurement process. Waste management and the move away from landfill are driven by the Climate Change agenda. Climate change is a wider issue which the development of this solution can positively contribute. Carbon footprint is assessed as part of the life cycle analysis (WRATE). GCC will ask for details of emissions management as well as any other foreseeable environmental impacts and plans to mitigate these will be requested during competitive dialogue. DEFRA have commented on this issue directly by stating: "The plans could also make an important contribution to the drive to tackle climate change by delivering estimated net carbon savings of 33,800 tonnes in 2020, compared to the current arrangements, or 64,700 tonnes if the final technology solution includes combined heat and power."

Number 312 Type IND Name Ian Marshall Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

In general sites within zone c have good access to the M5 and therefore minimise the impact of traffic on the surrounding area

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X	X	
4. Javelin Park, Haresfield		X	
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West			

4. Please give a reason for your answers to Question 3.

Wingmoor Farm is adjacent to extensive areas of landfill and landraise / despoiled land and is therefore suitable. Easter Park & Javelin Park the sites are too close to existing businesses & residential premises Nastend farm the proposed site is too close to residential and business premises & there would be too great an impact on transport.

4. Officer Response.

Support for Wingmoor Farm sites is noted. With regard to Easter Park, the site has not been taken forward into the Publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations. With regard to Site 8, Nastend farm, the site has not been taken forward into the Publication WCS because although the County Council is the landowner, following discussions with the County Council's Waste Disposal Authority (WDA) it would appear that there is significant uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore, the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the Publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations. In relation to Javelin Park, clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on

Number 312 Type IND Name Ian Marshall Organisation not applicable/not provided

existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. In terms of traffic impact, PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

Number 374 Type IND Name David Mason Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	

4. Please give a reason for your answers to Question 3.

I wish to object most strongly to the inclusion of Wingmoor Farm East in your list of potential wate sites. It is much too close to housing and cannot be deemed safe for residents. I have also serious reservations about the capacity of approach roads.Again a safety issue, it cannot be safe for any users of such roads.

4. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. In terms of health and safety, PPS10 states that modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health. Furthermore, the detailed consideration of a waste process and the implications, if any, for human health is the responsibility of the pollution control authorities. PPS10 also states that, 'where concerns about health are raised, waste planning authorities should avoid carrying out their own detailed assessments, rather they should ensure, through drawing from Government advice and research and consultation with the relevant health authorities and agencies, that they have any advice on implications for health. The WPA duly sought the advice from the PCT/NHS through the site options consultation. In terms of traffic impact, PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. In relation to the three Wingmoor Farm East sites, The Publication WCS identifies part of Area C as a strategic site allocation under Core Policy WCS4. This site has been taken forward because it forms part of an existing waste management facility with support from the landowner/waste operator, which greatly increases the prospect of delivery. The site is also close to Cheltenham one of the county's two main urban areas. Furthermore the site is not at risk from flooding and there are relatively few sensitive uses located nearby. The importance of traffic issues in this area is recognised and any development would need to be supported by a Transport Assessment (TA) as appropriate. Area A is closest to a number of sensitive receptors and Following discussions with the waste operator it is evident that Area B is likely to be needed for other waste uses associated with the existing landfill operation and subsequent site restoration. For these reasons and having regard to the level of additional waste recovery capacity needed over the plan period, Areas A and B will not be taken forward into the Publication WCS. It should be noted that by not taking either Area forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 357 Type IND Name Patricia Ann Massey Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Easy access from the motorway for transportation of waste, without affecting local built up areas

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

Javelin Park has no immediate housing and has good access to motorway, as does Netheridge, which is already being used for similar things. Railway Triangle is the least suitable as it is surrounded by housing, schools, hospitals and home for elderly and the road access is already gridlocked without further pressure

4. Officer Response.

Support for Javelin Park and Netheridge Sewage Treatment Works noted. In terms of Site 7, Land North of Railway Triangle, the site has not been taken forward into the publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity

Number 357 Type IND Name Patricia Ann Massey Organisation not applicable/not provided

requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

6. Please give a reason for your answer to Question 5.

Having seen evidence of housing developments in other parts of the country that include incineration as part of the complex, to reduce heating costs, this is surely better than having current areas affected.

6. Officer Response.

Support noted. The provision of waste treatment facilities within the urban extensions would present the opportunity to use locally generated heat and power within the development. However, it is significant to note that the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the intention of Government to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I'm not sure/I don't know

8. Please give a reason for your answer to Question 7.

I have no knowledge of these areas

8. Officer Response.

Noted.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney	X		
3. Land at Lydney Industrial Estate, Lydney	X		

10. Please give a reason for your answers to Question 9.

The principle seems right, but areas I have no knowledge of

10. Officer Response.

Support in principle noted.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

as previous answer

Number 357 Type IND Name Patricia Ann Massey Organisation not applicable/not provided

12. Officer Response.

See previous response.

14. Do you have any comments on the Executive Summary?

No

14. Officer Response.

Noted.

15. Do you have any comments on Section 1?

No

15. Officer Response.

Noted.

16. Do you have any comments on Section 2?

No

16. Officer Response.

Noted.

17. Do you have any comments on Section 3?

No

17. Officer Response.

Noted.

18. Do you have any comments on Section 4?

No

18. Officer Response.

Noted.

19. Do you have any comments on the Sustainability Appraisal reports?

No

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

No

20. Officer Response.

Noted.

Number 359 Type IND Name Robert Massey Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

As the major problem for most residents will be the effect of transport. Proximity to the M5 is a major consideration.

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

Item 4 Javelin Park - I support use of this site as it is the most convenient site for the motorway and will have the least effect on the major population areas. Item 7 - I do not support extending use of this site as traffic is already a major problem and any increase in heavy vehicles will be unexceptable and also the effect on health, wellbeing and air quality will not be minor locally. Item 9 - Not as advantagous as Javelin Park but present usage and transport links point towards use

4. Officer Response.

Support for Javelin Park and Netheridge Sewage Treatment Works noted. With regard to Site 7, Land North of Railway Triangle, the site has not been taken forward into the publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste

Number 359 Type IND Name Robert Massey Organisation not applicable/not provided

recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

6. Please give a reason for your answer to Question 5.

only makes sense if incineration is chosen answer

6. Officer Response.

Comment noted. At the present time, the Council is technology neutral. This approach is consistent with advice contained in the Companion Guide to PPS10, which emphasises that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. The WCS has a role to play in ensuring all new development is underpinned by appropriate waste management infrastructure (e.g. recycling facilities). The site options consultation paper however focuses on identifying a site or sites suitable for accommodating a strategic waste management facility and there has been no interest from either waste operators or the developers leading the urban extensions in providing this type of facility as part of the development. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

Where as the central corridor is the obvious site for main sites, collection and distribution points on the periphery may be necessary for efficiency reasons

8. Officer Response.

Support noted, but on balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

don't know site or local transport conditions

Number 359 Type IND Name Robert Massey Organisation not applicable/not provided

10. Officer Response.

Noted.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

makes sense for transport reasons to cut number of trips and overall mileage

12. Officer Response.

Support noted, but see previous response with respect to sites outside of Zone C.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

none

13. Officer Response.

Noted.

14. Do you have any comments on the Executive Summary?

no

14. Officer Response.

Noted.

15. Do you have any comments on Section 1?

no

15. Officer Response.

Noted.

16. Do you have any comments on Section 2?

no

16. Officer Response.

Noted.

17. Do you have any comments on Section 3?

no

17. Officer Response.

Noted.

18. Do you have any comments on Section 4?

no

18. Officer Response.

Noted.

19. Do you have any comments on the Sustainability Appraisal reports?

Number 359 Type IND Name Robert Massey Organisation not applicable/not provided

no

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

no

20. Officer Response.

Noted.

Number 433 Type IND Name R P Massey Organisation not applicable/not provided

17. Do you have any comments on Section 3?

Putting to one side my concerns about the possible procesees concerned i.e. incineration etc. my main concern is the inevitable increase in heavy traffic on roads unsuitable for the present loads let alone the increased numbers invisioned,

17. Officer Response.

Comments noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan.

Number 91 Type IND Name Lucy McCaskie Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I was reading a letter I was sent about the waste proposals that the county council are working on. I know that waste is an important issue but I think you have missed a trick with your materials. The stats are heafty but don't really mean much to me. How much is 290,000 tonnes? How much space does that take up, how does it compare to other countys?

17. Officer Response.

Comment noted. The publication WCS will include a range of information on waste data and will be supported by more detailed information contained in the supporting evidence paper on waste data. In general terms, households in Gloucestershire generate around 1.2 tonnes of waste each year (source Gloucestershire Joint Municipal Waste Management Strategy (JMWMS).

Number 385 Type AGEN Name Tim McCombe Organisation Government Office for the

15. Do you have any comments on Section 1?

The purpose of the consultation is clear and the document is concise and written in an accessible way for the lay reader, whilst signposting supporting evidence to those with a more technical interest who would like more detail. The process you have followed is transparent and readily understandable.

15. Officer Response.

Support noted.

16. Do you have any comments on Section 2?

Generally the approach you have taken appears consistent with national and regional policy. The Secretary of State has not yet issued the final version of the Regional Spatial Strategy (RSS) but considerable weight can be attached to the contents of the Secretary of State's Proposed Changes to the RSS given the late stage it has now reached in its preparation. The emerging strategy would appear sufficiently flexible to accommodate moderate changes to RSS, should these occur.

16. Officer Response.

Support noted. It is the Government's intention to formally abolish the South West RSS. Importantly however, the evidence that informed the preparation of the RSS may still be considered a material consideration. Furthermore, despite the potential abolition of the RSS, local authorities are expected to continue to progress their own development plan documents including waste plans, with enough land being provided for waste management facilities to support the sustainable management of waste.

17. Do you have any comments on Section 3?

The document refers to most recent estimates on waste data for the County and appears to represent a sound basis for the consideration of site options. Each of the sites under discussion is capable of accommodating facilities for a residual municipal waste capacity in the range of 150,000 to 270,000 tonnes per year. The RSS assumes a facility requirement within this range. This range also allows a contingency should municipal waste go over forecast calculations and should the County fall short of its 60% recycling target. There is a summary of sustainability appraisal findings for each of the sites on which the consultation focuses. The text describes the role of sustainability appraisal and signposts the reader to the independent sustainability appraisal undertaken by Land Use Consultants. The assessment schedule for each site provides a comprehensive summary of the suitability of each one. This includes their deliverability. Which site or sites are eventually selected is a matter for local judgement and the core strategy process going forward. We hope the consultation document instigates the good response that its content and presentation deserve. We do wonder if the document might have briefly outlined the range of possible technologies and facilities for which these sites are being considered and whether this could prompt a more informed comment from the consultation. It may be that some potential sites in people's opinions are more suited to one approach to waste as opposed to another and this would help them comment. In so saying we recognise that choosing an approach to waste treatment was not the focus of the consultation exercise and a good deal more work is underway in this respect, but setting out a slightly wider context might have helped to surface potential issues. The assessments do not compare the sites with each other but rather summarise their individual characteristics. It might also have helped if the document had stated whether any of the sites represented preferred options on the evidence thus far available. Also the document might have been clearer about the basis upon which a site or sites will ultimately be selected, presumably taking on board the results of the consultation, the residual waste project as well as further evidence work. Nevertheless these possible omissions aside, the consultation represents a good positive and useful step along the way toward publishing a Waste Core Strategy.

17. Officer Response.

Comments noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that

Number 385 Type AGEN Name Tim McCombe Organisation Government Office for the

when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10 which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.

Number 457 Type BUS Name Chris McGough Organisation Warner Estate Holdings Plc

17. Do you have any comments on Section 3?

You are now aware that our site (Quadrant Business Park) has an implemented planning permission for B1, B2 and B8 uses and our focus will continue to be on bringing forward commercial development in accordance with that consent. We have also had concerns expressed to us by prospective tenants about the possible waste handling facility, which we are continuing to respond to on the basis that it is very early in the LDF procedure and our focus is other commercial development at this stage It is clear that there is still a long way to go before the preferred site is actually allocated. Importantly though, we have concerns about what it might mean for commercial development of the site in the mean time. This is particularly so as it is by no means certain that our site will be allocated and that the earliest this could happen is 2012/13. Despite that , I wish to reiterate AIF has no in principle objection to the Quadrant Park site being put forward as a waste handling facility. I think we agree that both these views are compatible. I noticed that the Citizen of the 9th December carried an article about the waste handling issue. It would seem I am not alone in thinking Javelin Park is probably the front runner for the allocation. I surmised this based it being one of the listed sites in the consultation document and the fact that it is half owned by the Council. Clearly, if the report is accurate, the bidders have all indicated that their preferred site is Javelin Park too. I would confirm, apart frm yourselves, no one has contacted us about the possibility of locating the waste facility on our site. I consider this speaks volumes about what the operators think about our sites suitability.

17. Officer Response.

Comments noted. Whilst the site fulfils a number of criteria that make it suitable for waste treatment, given that the primary focus of the landowner is on implementing a commercial development and the fact that there is a lack of waste industry interest in the site, this creates some serious doubts concerning the deliverability of the site. For this reason it has been decided that land adjacent to Quadrant Business Centre will not be formally allocated in the publication WCS.

Number 324 Type PC Name E J McGrory Organisation Hardwicke Parish Council

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch		X	
4. Javelin Park, Haresfield		X	
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence		X	
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works		X	
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

These sites are not suitable for incineration. Other uses would be acceptable at any of these sites.

4. Officer Response.

Comment noted. At the present time the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10 which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Disagree

6. Please give a reason for your answer to Question 5.

Waste sites should not be near housing.

6. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also

Number 324 Type PC Name E J McGrory Organisation Hardwicke Parish Council

consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements.

7. Do you support the identification of sites outside Zone C?

I'm not sure/I don't know

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester		X	
2. Hurst Farm, Lydney		X	
3. Land at Lydney Industrial Estate, Lydney		X	

10. Please give a reason for your answers to Question 9.

They might be used for incineration.

10. Officer Response.

Comment noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10 which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. These sites will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the sites forward as allocations at this stage does not mean that the sites are unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

only if they are not used for incineration

12. Officer Response.

Comment noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10 which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste

Number 324 Type PC Name E J McGrory Organisation Hardwicke Parish Council

management technique or technology that would stifle innovation in line with the waste hierarchy.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No

13. Officer Response.

Noted.

14. Do you have any comments on the Executive Summary?

No

14. Officer Response.

Noted.

15. Do you have any comments on Section 1?

No

15. Officer Response.

Noted.

16. Do you have any comments on Section 2?

No

16. Officer Response.

Noted.

17. Do you have any comments on Section 3?

No

17. Officer Response.

Noted.

18. Do you have any comments on Section 4?

No

18. Officer Response.

Noted.

19. Do you have any comments on the Sustainability Appraisal reports?

No

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

No

20. Officer Response.

Noted.

Number 361 Type PC Name E J McGrory Organisation Shurdington Parish Council

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

There should be several small sites spread around the County to minimise traffic

2. Officer Response.

Comment noted. Zone C focuses on Gloucester and Cheltenham which is where most of Gloucestershire's waste is generated. Treating this waste close to source will help to reduce the distance travelled and is consistent with national and regional policy.
The Council requires a residual waste solution that is best value for Gloucestershire. The Council has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however it recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. It is essential that the WCS provides a clear strategy setting out what will be built and where. This will provide certainty and confidence to the development industry and help bring proposals forward. The Council's preferred strategy is to focus the location of new strategic waste management facilities on the area defined as Zone C. This approach is considered to be consistent with national policy (PPS10) and the Regional Waste Strategy. Although the preferred focus for strategic waste management is Zone C, a number of other sites were identified outside this zone in the Forest of Dean and Cotswold District in order to provide suitable flexibility and support for the Zone C sites. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

It depends what the sites will be used for

4. Officer Response.

Comment noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment

Number 361 Type PC Name E J McGrory Organisation Shurdington Parish Council

of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

6. Please give a reason for your answer to Question 5.

Depends what use they will be put to

6. Officer Response.

Comment noted. The potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I'm not sure/I don't know

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

11. Do you support the approach of using a combination of sites within and outside Zone C?

I'm not sure/I don't know

Number 52 Type INTL Name Stephen McHale Organisation Gloucestershire County

17. Do you have any comments on Section 3?

The Labour group found it very difficult to respond to a consultation process when we are not in possession of the full facts. There is no opportunity to comment on the various technologies for the sites listed. We note that all the sites could be used for inappropriate methods of waste disposal such as incineration, a process the Labour group could not support on any site in the County. We ask that the County Council should rule out incineration from its waste core strategy. This would allow for a more balanced policy of matching the technologies to the appropriate sites. It would be helpful if the County Council consulted with environmental groups when discussing waste disposal. We note that the County Council is quite happy to bring in private waste companies to make a decision for Gloucestershire. The County Council have identified 13 sites across the County. All the sites may be able to treat waste in some form, such as in-vessel composting and anaerobic digesting. By just indicating the sites are suitable for the treatment of household waste this would most certainly result in an inappropriate method of waste disposal. The County Council should dispose of waste where it is produced and not transporting it across the County to a central waste site, or even transporting waste from outside the County. Conclusion, The consultation is flawed as it is asking for comments relating to sites without detailing the preferred waste disposal technology for each site. We note that all 13 sites could be used for inappropriate methods of waste disposal. We ask the County Council to rule out incineration from its waste core strategy and start a new consultation policy based on recycling targets of 80% and identify many sites throughout the County and then use in-vessel composting and anaerobic digestion to dispose of the 20%residual waste. We urge the County Council to consult with environmental groups when discussing waste disposal not just listening to private waste companies who have a vested interest in the process. The County Council should take a more flexible approach to this issue to enable Gloucestershire to become a leading authority on waste disposal.

17. Officer Response.

Comments noted. Dealing with each in turn. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. The WCS has been subjected to extensive consultation with a range of stakeholders in 2006, 2008 and 2009. With regard to the residual waste project, GCC has always met with environmental groups when an invite has been offered and has maintained an open door policy. Prior to the procurement, GCC met with several groups on a number of occasions to discuss the project and continues to do so. In addition, environmental groups, specifically, have been invited to be involved in the two consultations that GCC has held. The first, in 2007, was mainly focused on the Joint Municipal Waste Management Strategy (JMWMS), but part of the discussions at the focus groups was about residual waste and technologies. In terms of the distribution of sites, the Council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the County. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. The advantages and disadvantages would be investigated further during the procurement process. With regards recycling the Council is already doing a great deal to increase more recycling and composting. The target of at least 60% by 2020 is 10% higher than the national target over the same period. There will however always be an element of leftover or 'residual' waste that needs to be managed. GCC will be procuring a solution that aligns with its recycling and composting objectives.

Number 52 Type INTL Name Stephen McHale Organisation Gloucestershire County

Tonnages are based on achieving 60% recycling capacity and are reviewed regularly using the most up to date figures.

Number 153 Type CCLLR Name Fiona McKenzie Organisation Gloucestershire County

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester		X	

10. Please give a reason for your answers to Question 9.

Foss Cross Industrial Estate Dear Sir/Madam, I am writing in response to the consultation exercise with specific comments on the possible inclusion of Foss Cross. As the county councillor for the area I am concerned at the possible damage such development would cause. I consider the site NOT to be suitable for the treatment of residual household waste for a number of reasons: 1.The site is not close to Cheltenham and Gloucester and is outside zone C. It would result in additional journey time which would not be sustainable; 2.It would increase the volume of traffic which would have a detrimental effect on the neighbouring hamlet of Calmsden and would impact on the potential residential use of Old Gore Barn, which is situated to the south of Foss Cross; 3.The site is successfully used as a recycling centre and the small area currently used for this purpose would not readily adapt to the treatment of waste. Most of the industrial estate is occupied by a number of successful local businesses which could be adversely affected by excessive traffic, noise and smell; 4.The site is in an AONB and is just south of a SSSI. The landscape aspect of a development would be detrimental; 5.The development of the site for treatment of waste could markedly change the profile of birds adjacent to the site. A waste treatment site would have a damaging effect on surrounding birdlife through encouraging vermin and corvids; 6.There is seepage of methane from the old landfill site just north of the recycling centre which indicates there is a significant risk of contamination of the land already. In summary the site is successfully used as a recycling centre which uses the available area to its maximum. There would be no further room for the treatment of residual waste or transfer of organic waste at Foss Cross. I therefore urge you NOT to include this site for the treatment of residual waste, both residential and commercial.

10. Officer Response.

Comments noted. Dealing with each in turn. Whilst the Council's preferred strategy is to provide strategic waste management facilities within Zone C, there is likely to be a role for sites outside this area e.g. smaller scale provision or supporting infrastructure e.g. waste transfer. In terms of traffic, PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. In terms of the existing use of the site, the re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community. Odour and noise are matters that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any 'sensitive receptors'. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning conditions. In terms of development within the AONB, national policy does not prevent development within the AONB. It does, however, demand that the need for such development can be demonstrated and that the development is carried out to high environmental standards. Foss Cross would not be considered suitable for a large-scale facility and would only be suitable for a small-scale facility to support a strategic network of sites. Any potential impacts from development on the adjoining areas of farmland would need to be considered through an environmental assessment at the planning application stage should a detailed proposal come forward. Existing contamination of the site would also be considered. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. This site will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 195 Type IND Name Dionne Meade Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Having weighed up all the facts, I am still strongly against waste sites here on account of the traffic this will incurr in such rural areas; perhaps more importantly, this will in turn reduce the amount of 'green' recycling, on account of having to 'feed' the incinerator. The ash is also another concern - we know this will be blown around haphazzardly engulfing people's properties (Cheltenham's experience).

2. Officer Response.

Comment noted. The focus on Zone C is consistent with national and regional policy and reflects the fact that Gloucester and Cheltenham generate most of Gloucestershire's waste. In terms of traffic impact, locating waste management facilities within Zone C will help to ensure that the most waste is treated as close to source as possible (thereby reducing trip length). With regards to traffic in rural areas, the use of transfer facilities to 'bulk-up' waste from smaller collection vehicles into larger vehicles, will help to reduce the number of separate trip movements that need to be made. PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by development criteria including those relating to transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. In terms of incineration, the Council is technology neutral and the sites identified in the site options consultation are capable of accommodating a range of different treatment options. In any case, there is no evidence to suggest that incineration reduces the amount of recycling. 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling as reality proves the contra argument. With regards to ash, any ash produced by modern waste management facilities is carefully managed to ensure that it does not get airborne. APC (fly-ash) residues would be regulated by the Environment Agency through the Environmental Permitting regime.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield		X	
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

I live in Haresfield. When I moved here (3 yrs ago) I had hunted hard to find affordable housing in a rural area (and even then I had to take advantage of the Key Workers Scheme). When I think of the noise and traffic pollution alone, I feel pretty hard done by. The blot on the landscape this will cause is so unsightly for an area

Number 195 Type IND Name Dionne Meade Organisation not applicable/not provided

which has so far managed to remain 'rural' and unscathed by town planners.

4. Officer Response.

Comment noted. All of the 13 sites identified in the site options consultation paper were subjected to a landscape appraisal. Site 4 - Javelin Park was considered to have medium -high landscape suitability. Importantly the site already has planning permission for employment use. The principle of built development in this location has therefore already been accepted. The site has been taken forward into the publication WCS because there is support from the landowners which greatly increases the prospects of delivery, the site is located close to Gloucester one of the county's main urban areas, the site enjoys good access to the strategic road network (SRN) is not at risk of flooding, has no other significant nearby environmental constraints and there are relatively few sensitive uses located nearby. Furthermore whilst the site is not currently in waste management use, it is previously developed (brownfield) land.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Disagree

6. Please give a reason for your answer to Question 5.

Save our rural spaces! The 'town' needs to stop spreading outwards! Urban re-generation, by all means on 'brown' sites, but keep our countryside, its wildlife; its peace. The dilapidated areas of towns and cities desperately need imput. We are gradually loosing our rural heritage.

6. Officer Response.

Comment noted. The WCS has a role to play in ensuring all new development is underpinned by appropriate waste management infrastructure (e.g. recycling facilities). The site options consultation paper however focuses on identifying a site or sites suitable for accommodating a strategic waste management facility and there has been no interest from either waste operators or the developers leading the urban extensions in providing this type of facility as part of the development. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I'm not sure/I don't know

8. Please give a reason for your answer to Question 7.

I'm not convinced that waste sites are even necessary; more recycling, more efficency there is the key, surely?

8. Officer Response.

Comment noted. The WPA agrees that waste should be reduced and that more recycling and composting should take place in line with the Waste Hierarchy (Annex C of PPS10). But clearly sites and facilities are needed in order that recycling and composting can take place. Furthermore, whilst the Council is striving to achieve its target of at least 60% recycling/composting by 2020, there will always be an element of leftover or residual waste that needs to be managed.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

Number 195 Type IND Name Dionne Meade Organisation not applicable/not provided

I'm not familiar with these areas, but surely this will impact on other residents. I can only think there will be others like me, who fear the results of this sort of intrusion to 'their land'.

10. Officer Response.

Comment noted. Both Foss Cross and Lydney industrial estate house existing waste management and industrial operations respectively. Hurst Farm although currently Greenfield is allocated in the Forest of Dean Local Plan for mixed-use development. The principle of development in this location has therefore already been accepted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should `provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, `with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the `proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. These sites will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the sites forward as allocations at this stage does not mean that the sites are unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I do not support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

Come on. Any of these sites will be a blot on the landscape. Promote composting, recycling etc. and people WILL take responsibility for their impact on the environment. Personal responsbility.

12. Officer Response.

Comments noted. All sites have been subjected to an initial landscape assessment. Should a detailed proposal come forward on any of these sites it would need to be supported by a design statement setting out how the visual impact of the development could be minimised through appropriate design, materials and landscaping. Clearly any facility will have some degree of impact. In terms of recycling and composting, the County Council's target is to achieve at least 60% recycling and composting by 2020. This is an ambitious target that exceeds the national target of 50% over the same period. However, even with effective recycling and composting initiatives there will always be an element of 'residual' waste (i.e. the waste leftover after composting and recycling) that will need to be treated or disposed of.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No.

13. Officer Response.

Noted.

Number 190 Type IND Name Louise Melling Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I'm not sure/I don't know

2. Please give a reason for your answer to Question 1.

I understand that you need a focused approach but I do not support sites so close to residential areas! I would be personally affected by the railway triangle site as I live just down the road from the potential site. I can see that you need to have them somewhere yet none seem to be in Cheltenham?? This particular sites is in a residential area! I don't understand why you can't have these sites on industrial sites away from where lots of people live. There are a lot of houses already nearby the triangle and planned further residential development. This area needs further housing and not industrial sites - there is a school and large hospital here. This means Horton Road and Great Western Road are busy enough already without the prospect of this! If this gets the go ahead, how can that possibly be compatible with further housing development? This is a nice area to live and with the prospect of further housing, it was going to get even nicer - this would stop all this dead. Why on earth would you put a major waste site in a residential area down the road from a hospital but more importantly, a school? There are hundreds of homes right next to this, including the recent redevelopment of the old Horton Road hospital site which has really enhanced this area - this will mean lots of industrial traffic which is fine in an industrial/business park as people don't live there! I can't imagine why anyone would also put a site where one of the main access roads has a level crossing which is heavily utilised. This site would mean effectively a regular traffic jam on Horton Road, right next to a huge housing development and in front of a school - I don't think anyone would think that's a good idea, do you?

2. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should `provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. With regards to sites in Cheltenham, a number of sites were identified in the initial long-list of 329 sites although these were excluded for various reasons including site size, flood risk, highways and availability.In terms of traffic impact it is important to note that land north of the Railway Triangle has an existing waste use on site which generates a large number of HGV movements daily. The traffic impact of any new facility must be considered in the context of those existing trip movements potentially being replaced, not necessarily added to. PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will specify necessary development criteria including those relating to transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. Notwithstanding the above, the site has not been taken forward into the publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of

Number 190 Type IND Name Louise Melling Organisation not applicable/not provided

land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch		X	
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre	X		
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park	X		
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West			

4. Please give a reason for your answers to Question 3.

Because these sites are on or near existing predominately industrial or business sites and would therefore have more limited impact.

4. Officer Response.

Comment noted. The use of existing waste management facilities is consistent with national policy however, regard must be had to the cumulative effect of previous waste disposal facilities on the care and well being of the local community including any significant adverse impacts on environmental quality, social cohesion and inclusion or economic potential'. (PPS10). The sites identified in the site options consultation paper included a mix of sites, mainly previously developed land or land with planning permission for development. This included several sites that accommodate existing waste management operations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Disagree

6. Please give a reason for your answer to Question 5.

Becuase as well as creating further business development, this is also about developing housing. I would disagree if future sites were near housing for the same reason that I am objecting to a site being near my home.

6. Officer Response.

Number 190 Type IND Name Louise Melling Organisation not applicable/not provided

Comment noted. See previous response in relation to impact on residential areas. In relation to the RSS, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I'm not sure/I don't know

8. Please give a reason for your answer to Question 7.

I don't know enough about the impact on these sites to be able to comment.

8. Officer Response.

Noted.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

See response to question 8.

10. Officer Response.

See previous response to Question 8.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

My answer is conditional upon these sites have a reduced impact on nearby housing. If that is the case, and I don't know as I couldn't see any impact assessment in the consultation document for these sites, then I would support them IF it meant using a reduced number of sites within zone C, mainly those with lesser impact on residents.

12. Officer Response.

Comment noted. See previous response in relation to impact on residential areas.

Number 21 Type IND Name Chris Merkel Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I write to object to the use of all 13 of the sites listed for possible waste treatment in Gloucestershire on the grounds that: Any of these sites could be used for incineration, which I oppose Incineration creates fly ash residue which is toxic and dangerous and that has to be transported and buried creating a risk to nearby residents, which is unacceptable I understand that incineration contracts will be for at least 24 years, locking us into a solution that does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies that are being rapidly developed. The long terms costs to the taxpayer will be higher with incineration. Incinerators act as a disincentive to reduce, reuse and recycle. The site are not evenly distributed around the county, giving too little weight to the negative aspects of transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas. Mechanical biological treatment, including anaerobic digestion technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and the tax payer. Large incinerators in other areas of the country are already deemed to be a mistake.

17. Officer Response.

Comments noted. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 197 Type IND Name Martin Metcalfe Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

I can see the logic of using the motorway corridor. Your assertion that this will not involve the flood plain or AONBs is not pursuasive - although there may be suitable industrial sites.

2. Officer Response.

Support for Zone C noted. In terms of flood risk, it is acknowledged that Zone C includes some areas of floodplain however it does avoid the majority of floodplain which is located in the western part of the County. All sites have been subjected to a Strategic Flood Risk Assessment (SFRA) and are located in low risk areas of flooding (Zone 1). Any proposal of more than 1 hectare in size would need to be supported by a site-specific Flood Risk Assessment (FRA). With regards to the Cotswold AONB, Zone C has been drawn contiguous with the AONB boundary and therefore does not include any of the AONB.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X		X
4. Javelin Park, Haresfield		X	
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence		X	
7. Land north of Railway Triangle, Gloucester	X		
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

A number of the sites chosen are rural and would affect vistas and impact on nearby AONB.

4. Officer Response.

Comment noted. The majority of the sites included in the site options consultation paper comprise either sites in a current use or previously developed land. All sites were subject to a landscape assessment. If a planning application were to come forward on any of the sites, the visual impact of development would be further considered as part of that process. Zone C has been delineated in order to avoid the Cotswolds AONB thereby minimising any impact. Although Foss Cross is within the AONB it is a site in existing use thereby minimising any impact. In any case this site is not being taken forward into the publication WCS.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Agree

6. Please give a reason for your answer to Question 5.

Small units should be considered as part of their infrastructure. Although many of these urban extensions are having a negative impact on rural areas.

Number 197 Type IND Name Martin Metcalfe Organisation not applicable/not provided

6. Officer Response.

Support noted. The WCS has a role to play in ensuring all new development is underpinned by appropriate waste management infrastructure (e.g. recycling facilities). The site options consultation paper however focuses on identifying a site or sites suitable for accommodating a strategic waste management facility and there has been no interest from either waste operators or the developers leading the urban extensions in providing this type of facility as part of the development. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

Given the poor choice of sites in zone C, all options should be investigated.

8. Officer Response.

Comment noted. Disagree that the Zone C sites represent a poor choice. All the sites were selected following Government guidance in PPS10. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney	X		

10. Please give a reason for your answers to Question 9.

Existing industrial sites should be used. This should EXCLUDE disused airfields renamed as industrial parks.

10. Officer Response.

Comment noted. Government policy suggests that industrial sites should be considered for waste management given the compatibility of modern waste management facilities and employment uses. The history of an industrial park is considered to be irrelevant. The key issue is that the principle of development has been accepted and that waste and employment uses are often compatible.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

Maximises choice of industrial sites. Rural sites should be avoided at all cost.

12. Officer Response.

Support noted.

Number 197 Type IND Name Martin Metcalfe Organisation not applicable/not provided

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No

13. Officer Response.

Noted.

14. Do you have any comments on the Executive Summary?

No

14. Officer Response.

Noted.

15. Do you have any comments on Section 1?

No

15. Officer Response.

Noted.

16. Do you have any comments on Section 2?

I do not see how PPS10 locational criteria have been applied to the sites. It is easy to be parochial, but how can an unspecified plant (although rumoured to be "10 stories high") meet these criteria at the Haresfield site? If I was better informed on the other sites, my same concern might apply. The views from Haresfield Beacon across the vale and the views up towards the Cotswold Way are unique and would be blighted by the plans.

16. Officer Response.

Comment noted. PPS10 is one of several influences on the overall strategy and individual sites selected for inclusion in the site options consultation paper. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. As such it is difficult to predict with any certainty the size of facility that will come forward. Visual impact which seems to be the key concern will be a matter for consideration should a detailed proposal come forward. Design, layout and landscaping can all be used to reduce the visual impact of a development. Notably the landscape assessment for Site 4 - Javelin Park identified the site as having medium-high suitability.

17. Do you have any comments on Section 3?

Covered above. Also what is meant by landscaping. How can the site options be judged when you do not describe what is going to be built? If the plant was small, say of the scale of the Blooms garden centre (which is too big for the location), then a second structure landscaped might be acceptable. How will the pollution (noise and air) from lorries delivering waste be offset? What would prevent the area from becoming a general dumping ground.

17. Officer Response.

Comment noted. See previous response to Question 16.

18. Do you have any comments on Section 4?

Insufficient information.

18. Officer Response.

Comment noted. The draft deliverability and implementation framework outlined in Section 4.0 is intended to be illustrative, showing the mechanisms through which the sites could be delivered. This will be expanded to cover all elements of the WCS in the formal publication strategy.

19. Do you have any comments on the Sustainability Appraisal reports?

Number 197 Type IND Name Martin Metcalfe Organisation not applicable/not provided

No

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

Seems like a whitewash

20. Officer Response.

Comment noted. It is unclear what is meant by this comment. Importantly, the most important statutory body in this field Natural England are happy with the HRA screening report and are fully engaged in the more detailed stages of Appropriate Assessment modelling to follow.

Number 61 Type IND Name Keith Mills Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

I write to object to any proposal to use land at Wing moor Farm, Stoke Orchard for the provision of additional waste disposal facilities. The reasons for my disagreement with proposal are as follows: The nearby villages are already affected by the noise and damage created by heavy lorries, this will be significantly worsened by a further development of this type which can be avoided by locating it elsewhere. Road safety will be further compromised in the area by additional heavy transport travelling along local roads, particularly with regard to local junior schools and the young children and parents that use them. Part of the site is used by Cheltenham Clay Club and it offers excellent facilities to members and visitors, there is no equivalent facility in the area. The club has been in existence for many years, and has an excellent record. The site has been landscaped by the club involving the planting of many hundreds of trees which now attract a varied range, of interesting birdlife. The site is not central to the county and will require the transport of material on journeys of many miles, hardly a "GREEN" practice. I feel there must be several" more appropriate "sites for you to use with better motorway access and would urge you to consider those first.

4. Officer Response.

Comments noted. Dealing with each in turn. PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. This should include matters such as lorry routeing and road safety issues. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the 'inclusion criteria' for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the Waste Core Strategy later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that his site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 257 Type IND Name Sylvia Mills Organisation not applicable/not provided

17. Do you have any comments on Section 3?

Regretfully, I may not be able to access Internet or exhibitions. Generally speaking, waste sites at Lydney must be well hidden, quiet, excellently managed, as this is an area for recreation and tourism, or should be! And can be! The whole waste issue is tiresome. Rats! How to deal with food waste along with green waste! Are householders wasting their time and are all the separated categories mixed up again! Horrid bits of plastic in your compost for 300 years!!! And so on. Regard to incinerators. Not in beautiful places. Not polluting the air of the poor. The heat-energy being used to benefit people. No grit. Residue for roads or building jobs.

17. Officer Response.

Comments noted. Waste is an important issue that needs to be addressed. It is no longer appropriate to continue disposing of waste to landfill sites. More sustainable alternatives need to be brought forward. Modern waste management facilities are similar in nature to many industrial uses and hence are often compatible with employment areas. Vermin is an issue that can be addressed through proper site management and the enforcement of planning and licensing conditions where appropriate. In terms of technology, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.
The potential benefit of energy recovered from waste in the form of heat and power is acknowledged.

Number 187 Type IND Name David Mole Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

There are large ares to the east of the county which are not included. Area C includes many of the existing sites. It is someone else's turn to suffer this blight. The local authority should stick to its earlier commitments. I.e. Planning granted for a set period of years and then stopped amd moved elsewhere.

2. Officer Response.

Comment noted. The re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community. A total of 329 sites were identified on an initial 'long-list' of sites. These were reduced on the basis of site size, location, flood risk, highways and deliverability. Some of the eastern parts of the County have not been considered as they are too remote from the main sources of waste and would be contrary to national and regional policy.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch		X	
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

Wingmoor farm in all its guises has had its day. It is time to move on! Give the residents around this area a break from this enviromental blot on the landscape.

4. Officer Response.

Comment noted. The re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

6. Please give a reason for your answer to Question 5.

I cannot believe that the local authority has any clout when it comes to new housing. The government overrule local views and build monstrous developments on green or agricultural land. What I say on relation to waste management in new developments will be a waste of breath. The developers never complete on the promises made to local communities in advance of planning and local authorities seem powerless to enforce this.

6. Officer Response.

Number 187 Type IND Name David Mole Organisation not applicable/not provided

Comment noted. The WCS is a statutorily adopted document and presents the opportunity to stipulate certain requirements of new development. Such requirements can be secured through the planning process via planning conditions and legal agreements which developers are required to comply with. However, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a waste treatment facility or facilities as part of those proposals. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

Areas which have not suffered from this blight should now be considered.

8. Officer Response.

Support for sites outside Zone C is noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations. The respondent's concerns about the need to share the burden of waste management are recognised. Government guidance in PPS10 does require planning authorities to consider the cumulative effect of previous waste disposal facilities on the well-being of the local community, including any significant adverse impacts on environmental quality, social cohesion and inclusion or economic potential (Paragraph 21 i). This needs to be balanced against PPS10 (Paragraph 20) which states that waste planning authorities should consider a broad range of locations including industrial sites, looking for opportunities to co-locate facilities together and with complementary activities -reflecting the concept of resource recovery parks.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

I have no knowledge of these areas. I would say that you simply have not identified enough sites - why?! You seem determined to take the line of least resistance. That is sticking to the existing sites.

10. Officer Response.

Comment noted. In total 13 sites were identified in the WCS Site Options consultation. These were derived from an initial long-list of 329 sites. Whilst some of the sites identified are already in use for waste management, considering these sites is consistent with advice contained in PPS10 and the companion guide to PPS10. The supporting evidence base clearly outlined the site-selection process.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I'm not sure/I don't know

Number 187 Type IND Name David Mole Organisation not applicable/not provided

12. Please give a reason for your answer to Question 11.

I am against Zone C full stop!

12. Officer Response.

Comment noted. See previous response.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

How on earth would I know? What I do know is that there must be more than three!

13. Officer Response.

Comment noted. The site options consultation paper included 13 sites drawn from an initial long-list of 329 sites.

14. Do you have any comments on the Executive Summary?

No

14. Officer Response.

Noted.

15. Do you have any comments on Section 1?

No

15. Officer Response.

Noted.

17. Do you have any comments on Section 3?

No but see above.

17. Officer Response.

Noted. See previous responses.

18. Do you have any comments on Section 4?

No

18. Officer Response.

Noted.

19. Do you have any comments on the Sustainability Appraisal reports?

No

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

No

20. Officer Response.

Noted.

Number 308 Type PC Name Alexia Monroe Organisation Bourton On The Hill Parish

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

It avoids the flood plans and AONB of the North Cotswolds

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

Bourton on the Hill is far too the north and we are unfamiliar with the locations indicated in Zone C

4. Officer Response.

Comment noted.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

It seems to sensible option to have flexiblity and they are not areas of outstanding beauty that they need to be protected, and the waste has to go somewhere.

8. Officer Response.

Support noted, however, on balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 308 Type PC Name Alexia Monroe Organisation Bourton On The Hill Parish

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

Again this is out of our jurisdiction, however, if they have merits then they should be considered as all possibles.

10. Officer Response.

Comment noted. It is essential that the WCS provides a clear strategy setting out what will be built and where. This will provide certainty and confidence to the development industry and help bring proposals forward. The Council's preferred strategy is to focus the location of new strategic waste management facilities on the area defined as Zone C. This approach is considered to be consistent with national policy (PPS10) and the Regional Waste Strategy. Although the preferred focus for strategic waste management is Zone C, a number of other sites were identified outside this zone in the Forest of Dean and Cotswold District in order to provide suitable flexibility and support for the Zone C sites. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

Flexibilty and common sense are needed.

12. Officer Response.

Support noted. See previous response.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No

13. Officer Response.

Noted.

Number 68 Type IND Name Be Montague Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I write to object to the use of all 13 of the sites listed for possible waste treatment in Gloucestershire on the grounds that: Any of these sites could be used for incineration, which I oppose. Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. The long term costs to the taxpayer will be higher with incineration. Incinerators act as a disincentive to reduce, reuse and recycle. The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. Large incinerators in other areas of the country are already deemed to be a mistake.

17. Officer Response.

Comments noted. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 69 Type IND Name George Montague Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I write to object to the use of all 13 of the sites listed for possible waste treatment in Gloucestershire on the grounds that: Any of these sites could be used for incineration, which I oppose. Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. The long term costs to the taxpayer will be higher with incineration. Incinerators act as a disincentive to reduce, reuse and recycle. The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. Large incinerators in other areas of the country are already deemed to be a mistake.

17. Officer Response.

Comments noted. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 128 Type IND Name Andrew Montague Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I write to object to the use of all 13 of the sites listed for possible waste treatment in Gloucestershire on the grounds that: Any of these sites could be used for incineration, which I oppose. Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. The long term costs to the taxpayer will be higher with incineration. Incinerators act as a disincentive to reduce, reuse and recycle. The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. Large incinerators in other areas of the country are already deemed to be a mistake.

17. Officer Response.

With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 131 Type IND Name Tim Montague Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I write to object to the use of all 13 of the sites listed for possible waste treatment in Gloucestershire on the grounds that: Any of these sites could be used for incineration, which I oppose. Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. The long term costs to the taxpayer will be higher with incineration. Incinerators act as a disincentive to reduce, reuse and recycle. The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. Large incinerators in other areas of the country are already deemed to be a mistake.

17. Officer Response.

With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 353 Type PC Name Susie Moore Organisation Chedworth Parish Council

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

for the same reasons you have set out

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

we do not live near zone C

4. Officer Response.

Noted.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

6. Please give a reason for your answer to Question 5.

more sustainable/less mileage

6. Officer Response.

Support noted. The WCS has a role to play in ensuring all new development is underpinned by appropriate waste management infrastructure (e.g. recycling facilities). The site options consultation paper however focuses on identifying a site or sites suitable for accommodating a strategic waste management facility and there has been no interest from either waste operators or the developers leading the urban extensions in providing this type of facility as part of the development. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead their waste management requirements will be addressed through the general policies and requirements of the WCS.

Number 353 Type PC Name Susie Moore Organisation Chedworth Parish Council

7. Do you support the identification of sites outside Zone C?

I do not support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

because sites outside Zone C are less suitable

8. Officer Response.

Comment noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester		X	
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

FossCross is in the Cotswolds AONB where further development of the existing site, and the increased lorry movements, would be contrary to the purpose of AONB designation.

10. Officer Response.

Noted. National policy does not prevent development within the AONB. It does, however, demand that the need for such development can be demonstrated and that the development is carried out to high environmental standards. In relation to Foss Cross, having regard to forecast capacity requirements (i.e. the number of sites needed) and the need to manage waste close to source in line with national policy, it has been decided not to allocate any strategic sites outside the area referred to as Zone C (the central area of Gloucestershire). As this site is outside Zone C it is not being taken forward. Also, the lack of waste industry interest in response to this site through the site options consultation (2009) raises question marks over the deliverability of the site for waste management purposes. Furthermore, the Environment Agency (EA) has raised concerns in response to this site in relation to groundwater issues. Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I do not support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

Zone C is the most suitable for all the reasons you have put forward

12. Officer Response.

Support for Zone C is noted.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

Number 353 Type PC Name Susie Moore Organisation Chedworth Parish Council

No

13. Officer Response.

Noted.

14. Do you have any comments on the Executive Summary?

Good

14. Officer Response.

Support noted.

15. Do you have any comments on Section 1?

OK

15. Officer Response.

Support noted.

16. Do you have any comments on Section 2?

getting wordy & boring

16. Officer Response.

Comment noted. The consultation document was made as easy to read as possible. However it was difficult to completely avoid the use of jargon, abbreviations and acronyms as waste is a technical subject.

17. Do you have any comments on Section 3?

ditto

17. Officer Response.

Comment noted. Section 3 of the site options consultation paper sets out the most important elements of the document i.e. what sort of sites are being identified, why, how and where. As a result this is the lengthiest section of the paper. However it has been drafted as concisely as possible.

18. Do you have any comments on Section 4?

ditto

18. Officer Response.

Comment noted. The site options consultation paper is as short and concise as possible with as much use of plain English and diagrams/photos as possible.

19. Do you have any comments on the Sustainability Appraisal reports?

ditto

19. Officer Response.

See previous response.

20. Do you have any comments on the Habitat Regulations report?

ditto

20. Officer Response.

See previous response.

Number 273 Type IND Name G C Morgan Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I am writing to protest to your undertaking to use site 'Area C' at Wingmoor Farm East for waste treatment. This site is currently used by our Cheltenham & District Clay Club and the lease on the ground remains for a further 4 years. The site is unique and used by members 3 times a week for target shooting and provides affordable sporting facilities for both sexes. The area is landscaped, well maintained with 400 trees planted. There is no other club in Gloucestershire which offers this range of facilities to club members for the price. I would think that the Council is aware that being in a rural area, the roads are too narrow for heavy lorries with limited access to the site to link to major roads and motorways. The surrounding area of Stoke Orchard and Bishops Cleeve would become very hazardous for the local inhabitants, not to mention the increase in smoke and pollution levels from the incinerator. If you do decide to continue with an incinerator at this location I would ask you to please provide an alternative facility where we could continue to carry on enjoying our sport with equal facilities. Please do not stop us from enjoying ourselves and taking part in our sport of shooting. Surely there are more economic sites in the area for the Council to use with less impact on the local community.

17. Officer Response.

Comments noted. PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. For the Wingmoor sites, the assessment identified a potential net increase in traffic and the need for mitigation in certain locations to help increase capacity. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. PPS10, states that 'modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health'. Furthermore, the detailed consideration of a waste process and the implications, if any, for human health is the responsibility of the pollution control authorities. PPS10, where concerns about health are raised, waste planning authorities should avoid carrying out their own detailed assessments rather they should ensure, through drawing from Government advice and research and consultation with the relevant health authorities and agencies, that they have any advice on implications for health..' The WPA duly sought the advice from the PCT/NHS through the site options consultation. In terms of technology, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the inclusion criteria for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the

Number 273 Type IND Name G C Morgan Organisation not applicable/not provided

delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that this site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS national policy and any other material considerations.

Number 329 Type IND Name Hugh Morris Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Waste treatment facilities present a nuisance and a hazard to human populations due to increased traffic and noise and the production of unpleasant or toxic fumes and ash. Consequently, such facilities, if they must be built, should be situated well away from population centers. Zone C includes the most densely populated parts of the county - Gloucester and Cheltenham

2. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10 , which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. In terms of traffic impact, PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by development criteria including those relating to highways and transport. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. In terms of health impact, PPS10 states that modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health. GCC view health impacts and safety as important and it is important to note that there is an opportunity for the council to explore the concept of not just complying with regulations and emission controls, but also the potential to excel these, and understand the implications and benefits of bettering the proposed solutions. APC (fly-ash) residues if generated, would be regulated by the Environment Agency through the Environmental Permitting regime.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch		X	
4. Javelin Park, Haresfield		X	
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence		X	
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works		X	
10. The Park, Wingmoor Farm West	X	X	

Number 329 Type IND Name Hugh Morris Organisation not applicable/not provided

4. Please give a reason for your answers to Question 3.

All the proposed sites are in close proximity to towns: Gloucester, Stroud, Tewkesbury, Bishops Cleeve

4. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Disagree

6. Please give a reason for your answer to Question 5.

Waste treatment facilities should not be situated in or near urban areas

6. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should `provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. Notwithstanding this, it is significant to note that the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the intention of Government to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I do not support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

Remote rural locations should be sites of first choice, not after-thoughts

8. Officer Response.

Number 329 Type IND Name Hugh Morris Organisation not applicable/not provided

Comment noted. Clearly the provision of new waste management facilities in urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source and the urban areas of Gloucester and Cheltenham are where most of Gloucestershire's waste is generated. This approach is consistent with national policy in PPS10, which emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. It is also consistent with regional waste policy. It is also pertinent to note that the companion guide to PPS10 states that, 'with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Remote rural locations often have severe planning constraints, unsuitable roads (country lanes) and are far away from the areas where the majority of waste is produced. The designation of such sites for strategic waste management purposes would therefore be contrary to national and regional planning policy. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney		X	
3. Land at Lydney Industrial Estate, Lydney		X	

10. Please give a reason for your answers to Question 9.

Foss Cross is the only proposed site well away from population centers

10. Officer Response.

Comment noted. Having regard to forecast capacity requirements (i.e. the number of sites needed) and the need to manage waste close to source in line with national policy, it has been decided not to allocate any strategic sites outside the area referred to as Zone C (the central area of Gloucestershire). In relation to Foss Cross, as this site is outside Zone C it is not being taken forward. Also, the lack of waste industry interest in response to this site through the site options consultation (2009) raises question marks over the deliverability of the site for waste management purposes. Furthermore, the Environment Agency (EA) has raised concerns in response to this site in relation to groundwater issues. Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

Sites should be chosen to minimise the impact on Gloucestershire residents - the 'zone' is irrelevant

12. Officer Response.

Comment noted. See previous response to Q6.

14. Do you have any comments on the Executive Summary?

I find it difficult to comment in detail about the site options consultation document because it contains no specific information concerning the type of watse to be

Number 329 Type IND Name Hugh Morris Organisation not applicable/not provided

treated (municipal/commercial/industrial), the method of treatment (with/without incineration) or the quantity of waste to be treated. A large scale incineration plant processing mixed municipal/industrial waste would be undesireable in any part of the county, but totally unaccceptable in the middle of Gloucester (north of the railway triangle)

14. Officer Response.

Comment noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). With regard to Site 7, Land North of Railway Triangle, the site has not been taken forward into the Publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

17. Do you have any comments on Section 3?

Waste treatment facilities north of the railway triangle, which may include the processing of commercial and industrial waste, will blight the intended urban regeneration of the railway triangle - to include 400 new homes and 250 new jobs

17. Officer Response.

Comment noted. This site is not going forward, see previous response.

Number 343 Type PC Name Valerie Morris Organisation Woodmancote Parish Council

17. Do you have any comments on Section 3?

Following your recent letter with regard to Potential Waste Sites and the recent 'Roads how' at the Bishops Cleeve Parish Offices, Woodmancote Parish Council responds as follows: For over 20 years local parishes have had the movement and disposal of waste to the two sites of Wingmoor Farm operated by Grundon and Cory. Recently, Grundon has applied for planning permission to extend their operation until 2026. Your proposal to possibly include these sites to dispose of Landfill/Hazardous Waste and Recycling (and, possibly an incinerator) is asking these areas to accept a further increase in the daily heavy traffic movements, noise, dust and smells. Your letter was circulated amongst the Council, below are some of their comments: All 3 sites are too close to an urban area, particularly Bishops Cleeve. None of the sites have resolved the pollution problem and the traffic situation can only worsen. With the current road setup and close proximity of residential homes, it seems that local residents will suffer great disruption to their lives, together with health risks from the increase in air pollution. Would like to see all waste arrive by rail I feel that the Wingmoor area will be a dumping ground for everybody's waste. Re: Summary of SA results, parts of the document are confusing and misleading, after all, 'minor negative' or 'major negative' is still negative! From time to time Woodmancote is subjected to an odorous smell from the 'leeching ponds' which, despite the Environments Agencies best efforts have been unable to resolve. One of the biggest concerns is the movement of traffic. At the present time no 'heavy' vehicles are permitted to enter and leave the site via Stoke Orchard. This means every vehicle has to enter by using Stoke Orchard Road and the Bishops Cleeve bypass, this is unacceptable. In addition to this, we have noticed increases in the movement of large vehicles through Woodmancote using Two Hedges Road and other smaller roads, despite GCC Freight Route Map. Woodmancote Parish Council urges Gloucestershire County Council, not to include these three sites as sites for the disposal of waste.

17. Officer Response.

Comments noted. Dealing with each in turn. In terms of existing operations, the re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community. With regard to proximity to housing, clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. With regard to pollution it should be noted that planning and pollution control regimes are separate but complimentary. Pollution control is concerned with preventing pollution whilst planning controls the development and use of land. Waste planning authorities are expected to work on the assumption that the relevant pollution control regime will be properly applied and enforced. In terms of traffic, PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. For the Wingmoor sites, the assessment identified a potential net increase in traffic and the need for mitigation in certain locations to help increase capacity. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. With regard to health, PPS10 states that modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health. Furthermore, the detailed consideration of a waste process and the implications, if any, for human health is the responsibility of the pollution control authorities. PPS10 also states that, where concerns about health are raised, waste planning authorities should avoid carrying out their own detailed assessments rather they

Number 343 Type PC Name Valerie Morris Organisation Woodmancote Parish Council

should ensure, through drawing from Government advice and research and consultation with the relevant health authorities and agencies, that they have any advice on implications for health. The WPA duly sought the advice from the PCT/NHS through the site options consultation. The Sustainability Appraisal (SA) Report was drafted in line with guidance and best practice. Odour, along with noise and dust are matters that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any sensitive receptors. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning conditions.

Number 417 Type IND Name Hazel Morris Organisation not applicable/not provided

17. Do you have any comments on Section 3?

Whatever is proposed for disposal of household waste/hazardous waste is inevitable. Wingmoor Farm East/West has taken the brunt of this waste over the years and, should not be allowed to extend this in the future. It is too near to residential areas where they have to put up with smells, this, and huge lorries in and out all the time. Not very environmentally friendly. We should not have to put up with all the waste coming here. You should be looking at ways to deal with waste in smaller capacity around the county - preferably away from residential areas. Hopefully common sense will prevail.

17. Officer Response.

Comments noted. The re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community. Clearly the provision of new waste management facilities in urban areas has the potential to have a degree of impact on existing occupants. However, it is important that waste is managed close to source and the urban areas of Gloucester and Cheltenham are where most of Gloucestershire's waste is generated. It should also be noted that the companion guide to PPS10, states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. With regard to odour this is a matter that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any 'sensitive receptors'. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning conditions. It is also pertinent to note that the consultation relates to waste treatment not disposal (landfill). Waste treatment facilities often involve waste being delivered into enclosed environments, thereby minimising the potential for odours to escape to air.

Number 116 Type IND Name David and Margaret Mountifield Organisation

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

We support the approach of focussing the search for strategic waste sites on the area defined as Zone C providing that the roads leading to these sites are able to support the heavy and prolonged use of transport that will be needed. These sites must not be too near to residential housing.

2. Officer Response.

Support noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. In terms of transport, PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by development criteria including those relating to transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X		
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West			

4. Please give a reason for your answers to Question 3.

Areas 1,2,3,4,6,9 and 10 we consider to be suitable. Areas 5,7 and 8 are in our opinion completely unsuitable. The area north of the Railway Triangle in Gloucester is the most unsuitable. Residential housing is adjacent to this site and the roads and access are completely unsuitable for this type of operation. Horton Road is needed for access to the hospital by ambulances and emergency services. A school in this road already causes considerable difficulty at certain times of the day.

Number 116 Type IND Name David and Margaret Mountifield Organisation

Pollution of the hospital grounds by an incinerator would also cause consternation and worry. On leaving the hospital, the other afternoon, traffic in Horton Road was at a standstill and therefore emergency vehicles could not attend residential housing or the hospital!

4. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. In reference to Site 7, Land North of Railway Triangle, since the site options consultation was undertaken in October 2009, the Waste Planning Authority has carefully considered all the issues related to this site. The site has not been taken forward into the publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.In reference to the mention of 'an incinerator', at the present time the Council is 'technology neutral'. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Agree

6. Please give a reason for your answer to Question 5.

Extra land should be made available in these urban areas for waste processing.

6. Officer Response.

Number 116 Type IND Name David and Margaret Mountifield Organisation

Support noted. The WCS has a role to play in ensuring all new development is underpinned by appropriate waste management infrastructure (e.g. recycling facilities). The site options consultation paper however focuses on identifying a site or sites suitable for accommodating a strategic waste management facility and there has been no interest from either waste operators or the developers leading the urban extensions in providing this type of facility as part of the development. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

We support these areas as they are generally away from residential development

8. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source and the urban areas of Gloucester and Cheltenham are where most of Gloucestershire's waste is generated. This approach is consistent with national policy in PPS10, which emphasises that planning strategies should 'provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities'. It is also consistent with regional waste policy. It is also pertinent to note that the companion guide to PPS10 states that, 'with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development'. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the sites forward as allocations at this stage does not mean that they are unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney	X		

10. Please give a reason for your answers to Question 9.

As this land is already used for waste disposal it appears to be highly suitable

10. Officer Response.

Support noted. The re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. These sites will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the sites forward as allocations at this stage does not mean that the sites are unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the

Number 116 Type IND Name David and Margaret Mountifield Organisation

relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

There needs to be more than one site used for waste disposal with plenty of flexibility. These sites need to use various methods of waste disposal.

12. Officer Response.

Support noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

None

13. Officer Response.

Noted

14. Do you have any comments on the Executive Summary?

We do not feel able to comment on this or any further questions.

14. Officer Response.

Comment noted.

Number 62 Type IND Name Anna Mozol Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I am writing to register my opposition to County Council's proposal to build a Waste Incinerator in Gloucestershire. As a resident of Quedgeley I would like to make it clear that I am specifically opposed to the siting and building of a Waste Incinerator at any of the proposed sites which are: Javelin Park near to Junction 12 of the M5, Quadrant Business Park, Netheridge Sewage Works I have also recently read in a local paper that a deal has been signed to build a massive recycling and waste treatment, which will treat rubbish from homes in Bristol, Bath, North Somerset, and South Gloucestershire, using a specialist firm New Earth Solutions, so why does the County Council not speak to these people? The site was owned by St. Modwen, this is an 11 acre brown field site, Nr. Avonmouth, so why can they not take ours? Any method of waste disposal needs to be as environmentally friendly as possible so the County Council should be looking at biomass and other forms of waste management that will utilise composting, biomass and other forms of recycling that allow biodegradable materials to be utilised in other ways. Landfill is the last resort and this should be reduced as the amount being reduced, reused or recycled increases. Gloucestershire County Council needs to ensure that any items deposited in landfill sites in Gloucestershire originate within the borders of Gloucestershire. We should not be importing waste from outside the area covered by Gloucestershire County Council as we are doing now. Incineration is not an option and should never be considered to be an option for at least 3 reasons: 1.To make any incinerator economically viable Gloucestershire County Council will need to import massive amounts of waste from outside Gloucestershire 2.To deliver this waste to the proposed waste incinerator will require a massive increase in the number of lorries on our roads - motorway, main roads and village roads - which will increase pollution and traffic congestion as well as increasing the repair bill for our roads. 3.More and more of Gloucestershire's waste will be burnt rather than recycled.

17. Officer Response.

Comments noted. Dealing with each in turn. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. In terms of importing/exporting waste, the council endeavours to deliver a solution to manage Gloucestershire's residual waste, not waste from outside the county. To promote flexibility of the solution and further recycling above the minimum 60% target, the council would be open to views on the treatment of Gloucestershire's commercial waste. It is important to note that household waste is only 25% of the total waste produced by Gloucestershire. With regard to traffic, PPS10 - Planning for Sustainable Waste Management emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. The Council is already doing a great deal to increase more recycling and composting. The target of at least 60% by 2020 is 10% higher than the national target over the same period. There will however always be an element of leftover or 'residual' waste that needs to be managed. GCC will be procuring a solution that aligns with its recycling and composting objectives. Tonnages are based on achieving 60% recycling capacity and are reviewed regularly using the most up to date figures.

Number 285 Type IND Name Mr and Mrs Nash Organisation not applicable/not provided

17. Do you have any comments on Section 3?

My husband and I are very concerned about your proposal to extend the landfill site at Wingmoor Farm, which will encompass the Cheltenham and District Clay club grounds. As members we personally enjoy the experience on a weekly basis of this sport, it also enables us to exercise in the fresh air and enjoy the company of other members, thus using this site as recreation. We also have a grandson aged 12 yrs who has become interested in the sport, if we lose the ground where will he be able to participate? The site has been landscaped and trees planted over the past years making it impossible to move, but there has been no provision made in your plan anyway - to try and accommodate the club and its needs. There are other sites better situated for landfill other than Wingmoor Farm; deciding for this will drastically increase heavy traffic on already over stretched roads and destroy a pleasant area that breaks the urban sprawl that is taking over our much needed green belt. We understand there is a policy for recycling in the area, why then is it necessary to take away peoples pleasure places when we are all supposed to recycle domestic and commercial waste. For the past 12 years we have staged a clay pigeon shoot in memory of our son, at these grounds and have over £10,000 on behalf of The Cheltenham Cobolt Unit, this will cease if the club closes, what a pity. We feel sure there are better areas closer to motorways that are already vacant, our club is used three times a week for shooting and most days someone is there maintaining the ground, we must stress this point, the grounds are used by 200 members and it would be a great loss to the community.

17. Officer Response.

Comments noted. Dealing with each in turn. In terms of existing landfill operations, it should be noted that the consultation focuses on identifying sites for waste 'treatment' not disposal to landfill. The identification of sites at Wingmoor Farm does not relate to an extension to either of the existing landfill operations. The Council is actively promoting increased recycling and composting with a target of at least 60% by 2020. This is higher than the national target of 60% over the same period. However, there will always be a 'residual' element of waste that cannot be recycled or composted. Recovering value from this waste through appropriate treatment is consistent with the waste hierarchy. Suitable sites must be found to allow waste treatment facilities to be built. In terms of the gun club, Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the 'inclusion criteria' for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from TBC and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that this site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 20 Type IND Name J A Neale Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
8. Nastend Farm, Stroudwater Business Park		X	

4. Please give a reason for your answers to Question 3.

I write to object to the proposed waste site at Nastend, Eastington, Nr Stonehouse. Our area already suffers enough pollution (including traffic) from factories to the South West of the town. Maybe a greener alternative could be found at Sharpness with waste land, river and canal access, thus reducing traffic.

4. Officer Response.

With regard to Site 8, Nastend farm, the site has not been taken forward into the publication WCS because although the County Council is the landowner, following discussions with the County Council's Waste Disposal Authority (WDA) it would appear that there is significant uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore, the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 86 Type IND Name T Newman Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I was reading the parliamentary debate 20.10.09 by Pharmjit Dhanda and representatives of neighbouring counties and a some questions have been brought to mind. 1. If 75,000 tons (increasing to 100,000) are going to go up in flames, how much ash and waste material is going to be produced and where will it be sent? Not to a landfill site, surely, I thought we were going to be rid of them. There are things that cannot be burned, Landfill again! Also, there will be lorries taking the burned waste away. 2. Emissions. The supposedly non toxic smoke (can they guarantee it?) coming from an incinerator that will be working non stop and the fumes from the vehicles bringing the rubbish to be burned, will pollute the atmosphere and clog up the already busy roads, as not all of the rubbish may be locally sourced. This is hardly going to help Gordon Brown's agenda for reducing Britain's carbon footprint. 3. As part of the investigation into the benefits and/or detrimental effects of rubbish management, I don't ever remember being asked if I would recycling everything, which I wouldn't mind if it was done properly. Food could be composted and sold on if you don't use it. Material can be used to make paper. Aluminium and glass can be reused, and so on. Even the methane could be possibly syphoned of to the power stations. There would (hopefully) be less being put in the landfill and less transport because it would be our own dustcarts and local rubbish. The downside would be extra boxes but as with the big wheelie bins, nothing is perfect. 4. Does the council really want the sight of a huge chimney blighting the Gloucestershire area? The hospital one can be seen for quite a distance. One county nearby has tried an incinerator and now regrets it because it has tied them into a long contract that they can't get out of if legislation ever changes. 5. Does anyone remember the hospital incinerator when it first started? Bits of unburned rubbish was floating through the air and it had to be shut down for some time. 6. Does the Coucil have a plan "B" in case the new incinerator has to be shut down for any reason? Or will the rubbish build up waiting for it to be restarted? I recycle and take things to the ASDA car park bins and it is surprising how much you can get rid of (leaving the bin a bit emptier).

17. Officer Response.

Comments noted. Dealing with each in turn. In terms of the amount of waste, the site options consultation was undertaken on the basis of an estimate of 150,000 tonnes of municipal waste per year having to be treated through a waste management facility. This assumes that the target of at least 60% recycling by 2020 is achieved however if it isn't the amount could be as high as 270,000 tonnes per annum. It is unclear what the figures of 75,000 tonnes and 100,000 tonnes are derived from. In terms of technology, at the present time, the Council is technology neutral. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe

Number 86 Type IND Name T Newman Organisation not applicable/not provided

relies on incineration heavily as a method for diverting its waste from landfill.

Number 2 Type PC Name John R Nicholson Organisation Standish Parish Council

4. Please give a reason for your answers to Question 3.

****Additional comments made following additional Moreton Valence consultation**** In common with many parish councils, Standish Parish Council did not meet in August therefore its first opportunity to consider the contents of your letter dated 5th July 2010 was at its meeting on the 2nd September 2010. At that meeting, Council resolved to object to the proposal for the Moreton Valance Airfield Site to operate as a startegic waste management facility on the following grounds: - the site could be used as a waste incineration site - the site could be used for the processing of toxic waste. These objections are in line with Council's response in November 2009 to the Waste Core Strategy proposals. Council trusts you will be able to include its objection in the consultation process Yours sincerely, J R Nicholson Standish Parish Clerk

4. Officer Response.

At the present time, the Council is technology neutral. The 13 sites identified in the site options paper and the proposed extension to this site are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The Site Options consultation paper explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10 , which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.

17. Do you have any comments on Section 3?

We, as a Parish, are writing in response to your consultation document regarding the proposed 13 sites for possible Waste Disposal or handling in Gloucestershire. Standish Parish Council consulted residents at our annual Parish Meeting regarding the County Council possible proposals for waste management in the county and in particular at Javelin Park. There was overwhelming opposition to incineration being used at any sites in Gloucestershire, although all parishioners accepted that some form of sorting, digestion, recycling of waste must take place at some of the sites. Your questionnaire does not identify what form of treatment is proposed at any of the 13 sites. This makes the consultation invalid and impossible to respond to in a realistic way. The Parish Council therefore objects to any of the 13 proposed waste treatment sites if the intention is to use them for any form of incineration. The reasons the Parish Council and our parishioners oppose any form of incineration, small or large, are as follows: Incineration creates large amounts of C02 Emissions from the burning of the waste, contributing to global warming; Incineration is badged as 'energy from waste'. However, it is the most ineffective technology for the production of energy; Incineration promotes the destruction of our planet's valuable resources. It takes 4 times as much energy to produce things from new rather than from recycling; During incineration toxic particulates build up in surrounding areas. A report on 'The Health Effects of Waste Incinerators' by the British Society for Ecological Medicine states that 'fine particulate pollution plays an important role in both cardiovascular and cerebrovascular mortality.. the danger is greater than previously realized ... Large studies have shown higher rates of adult and childhood cancer and also birth defects around municipal waste incinerators: the results are consistent with the associations being causal.' No new incinerators have been built in America since 1995 because of health concerns; After incineration, up to 10% of waste remains to be buried as bottom ash and fly ash, both of which are toxic. In contrast, waste from other technologies (e.g MBT) is inert; Incineration is an old and outdated technology - other more environmentally friendly and cost-efficient technologies are already available and innovation in the field is happening rapidly. Incineration discourages reducing, reusing and recycling because the incinerator needs to be continuously fed. All major supermarkets are moving towards 100% recyclable packaging; Incineration also inhibits the development of new green business and enterprise and new jobs based on recycling materials. In particular, Standish Parish Council is averse to one big incinerator anywhere in the county because: One large incinerator would increase C02 Emissions from the transportation of waste to one central waste site; One large incinerator (as may happen via the PFI process) would be totally inflexible. This incinerator would have to burn recyclable rubbish continuously and therefore, when county waste levels fall, would require imported waste from outside the county; In addition, the commitment to a 25 to 30 year contract with the potential for penalties, if there is insufficient waste supplied, is unacceptable and potentially costly to the county council tax payers. The residents of Standish could not accept the building of one

Number 2 Type PC Name John R Nicholson Organisation Standish Parish Council

large waste incinerator at Javelin Park, Moreton Valence or Nastend Farm, because: The visual impact on the local area of a large incinerator is unacceptable. An incinerator would be a much larger structure than either MBT or AD. The 3 sites proposed in our area all border and are visible from the local AONB; In particular Javelin Park would generate vastly inflated traffic on the B4008, which is already an accepted accident hotspot. Standish Parish Council supports the use of local, district-based, environmentally friendly methods for waste treatment including Mechanical Biological Treatment (MBT) and Anaerobic Digestion (AD) and feel that facilities for this could be acceptable at most of the 13 sites. The above environmentally friendly methods of waste treatment are already proven alternative technologies. Manchester City Council has just bought 5 new MBT plants. Other areas of the country are already using this technology, and have ruled out incineration (e.g. Milton Keynes & South Shropshire District Council). A recent National Grid publication states that: 'Renewable gas has the potential to make a significant contribution to the UK's renewable energy and carbon reduction targets for 2020. And in the longer term, with the right government policies in place, renewable gas could meet up to 50% of UK residential gas demand. Produced mainly via a process of anaerobic digestion (AD) or thermal gasification of the UK's biodegradeable waste, renewable gas represents a readily implementable solution for delivering renewable heat to homes in the UK. Renewable gas can also deliver greater security of energy supply for the country as well as a solution for waste management as UK landfill capacity declines. 'Let us hope that Gloucestershire County Council will be in the forefront of the use of new technologies for waste treatment, rather than in the dark ages I We trust you will acknowledge and report our response in any report to Cabinet and Council.

17. Officer Response.

Comments noted.With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 13 Type PC Name John R Nicholson Organisation Nympsfield Parish Council

17. Do you have any comments on Section 3?

Further to your recent correspondence on the above, the contents of which were discussed at the latest meeting of Council. Council had no specific comments to make concerning the suitability or otherwise of any of the thirteen sites listed, or the advantages or disadvantages each might have over the others. Council was much more concerned with the specific activities which would take place on the selected site after the selection has been made. If this was to include large scale incineration, then it would cause Council serious concern, irrespective of where the site was located. Council wishes GCC to examine all operational options in managing the county's waste and to demonstrate due diligence in arriving at the best method to be employed, not simply the most expedient.

17. Officer Response.

Comments noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.

Number 442 Type PC Name John Nicholson Organisation Didmarton Parish Council

17. Do you have any comments on Section 3?

At its latest meeting, Council resolved to object to the use of all 13 of the sites listed for possible waste treatment in Gloucestershire on the grounds that: Any of these sites could be used for incineration, which Council opposes. Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. Council understands that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. The long term costs to the taxpayer will be higher with incineration. Incinerators act as a disincentive to reduce, reuse and recycle. The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. Large incinerators in other areas of the country are already deemed to be a mistake. Council trust its objection will be included in the consultation exercise.

17. Officer Response.

Comments noted. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 399 Type DCLLR Name Lise Noakes Organisation Gloucester City Council

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
7. Land north of Railway Triangle, Gloucester		X	

4. Please give a reason for your answers to Question 3.

I particularly think that the land north of the Railway Triangle is most inappropriate. The Railway Triangle is one of the gateways to our city and needs to be developed into something pleasing and attractive. The effect on traffic here would also be catastrophic.

4. Officer Response.

Comments noted. In relation to Site 7, Land North of Railway Triangle, the site has not been taken forward into the publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

17. Do you have any comments on Section 3?

I do not support any site that is close to, or within Gloucester city. This is already the most congested part of the county in terms of people and traffic and is simply not appropriate for a site.

17. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10 , which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements.

Number 402 Type IND Name Lise Noakes Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

I particularly do not support sites 5 & 7 close to Gloucester City which is already the busiest part of the county and densly populated.

2. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. In relation to Site 7, Land North of Railway Triangle, since the site options consultation was undertaken in October 2009, the site has not been taken forward into the publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the Publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield		X	
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence		X	
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X

Number 402 Type IND Name Lise Noakes Organisation not applicable/not provided

10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

Not suitable in busy, populated areas

4. Officer Response.

Comments noted. Busy populated areas such as the centre of Gloucester are not necessarily an unsuitable location for a modern waste treatment facility. Various factors have to be tested. Please see response to Q2.

Number 416 Type ANON Name Not supplied Not supplied Organisation

17. Do you have any comments on Section 3?

I am writing to voice my anger over the proposed use of the clay club with no provision for moving the club ground where we have shot for many years at wingmoor farm for waste treatment. Cheltenham & district clay club is a well Established shooting club and as far as I can see the only proposed site with a recreational activity already on it. It is my belief that it would be a real struggle to find new facilities of this standard. The club has spent many years getting the layout and the area right many trees have been planted (aprox 400 witch we are all encouraged to do in this climate). And there is a real lack of good quality clay shooting grounds around. This area being on small roads will be seriously affected by the extra traffic where as other sites are located on or near main roads and many of these sites are already vacant. This area is not central to Gloucestershire and will mean lots of extra miles travelled.

17. Officer Response.

Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the 'inclusion criteria' for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that his site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 432 Type ANON Name Not supplied Not supplied Organisation

17. Do you have any comments on Section 3?

The idea that Waste maybe dealt with on land north to the triangle is extremely worrying. This land is completely surrounded by housing, school, old people's homes and the hospital. The work already allowed along Myers Road access creates many problems to the people who surround it, i.e. creosote in the air, creating problems for people with allergies. The dust from the gravel etc, lorries is excessive, you said they have to be covered, the drivers do not always adhere to the rules, the dust created is excessive some days, affecting washing on the lines, any increase in the traffic is going to be unbearable for those of us who have to attempt to get in and out of our roads. The obvious use for this land is housing and park and play areas making it an enjoyable place to be.

17. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. With regard to Site 7, Land North of Railway Triangle, the site has not been taken forward into the Publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the Publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 279 Type IND Name Darren Nott Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Logically the waste needs to be handled / disposed of as close to source as possible. The 'corridor' covers the major built up areas.

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester	X		
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

only knowledge of certain areas which are either existing sites or brownfield sites that can be used, no knowledge of other sites

4. Officer Response.

Comment noted. The re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community. The use of previously developed land is consistent with national and regional policy. The majority of the sites identified in the site options consultation paper are either previously developed or Greenfield with planning permission or a Local Plan allocation for employment use.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Agree

6. Please give a reason for your answer to Question 5.

makes sense to plan ahead for something that in all probability will happen in some form or other

6. Officer Response.

Support noted. The integration of waste management facilities into the urban extensions would allow waste from these developments and the wider Gloucester and Cheltenham area to be treated close to source in line with national and regional policy. However, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the

Number 279 Type IND Name Darren Nott Organisation not applicable/not provided

evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

need to have backups available in case of volume constraints / problems at main sites and it would make sense to spread these around to give flexibililty

8. Officer Response.

Comment noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney	X		

10. Please give a reason for your answers to Question 9.

existing industrial areas so minimal rsidential impact

10. Officer Response.

Support noted. Modern waste management facilities are acknowledged to be generally compatible with industrial uses. In terms of residential impact, it should be noted however that modern waste management facilities are not necessarily incompatible with residential areas. The companion guide to PPS10 states that, 'with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development'. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. These sites will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the sites forward as allocations at this stage does not mean that the sites are unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

see answer to q8

12. Officer Response.

Number 279 Type IND Name Darren Nott Organisation not applicable/not provided

See previous response

13. Are you aware of any other sites that might be suitable for treating municipal waste?

no

13. Officer Response.

Noted

14. Do you have any comments on the Executive Summary?

no

14. Officer Response.

noted

15. Do you have any comments on Section 1?

none

15. Officer Response.

noted

16. Do you have any comments on Section 2?

no

16. Officer Response.

noted

17. Do you have any comments on Section 3?

no

17. Officer Response.

Noted

18. Do you have any comments on Section 4?

no

18. Officer Response.

Noted.

19. Do you have any comments on the Sustainability Appraisal reports?

no

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

no

20. Officer Response.

Noted.

Number 262 Type IND Name Marion O'Dowd Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Smaller and scattered sites are preferable. They should be as close as practicable to the places where the waste is generated.

2. Officer Response.

Comment noted. The site options consultation paper identifies 13 potential sites, 10 within Zone C, 3 outside Zone C. Views are invited on using a combination of different sites. The consultation makes it clear that whilst some of the sites are capable of providing a one-site solution, it may be that strategic waste management of municipal waste comes forward on several different sites. The council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the county. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. The advantages and disadvantages would be investigated further during procurement process.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X		
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre	X		
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester	X		
8. Nastend Farm, Stroudwater Business Park	X		
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West			

4. Please give a reason for your answers to Question 3.

There is no reason to rule out any one site.

4. Officer Response.

Support for sites noted.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

6. Please give a reason for your answer to Question 5.

Number 262 Type IND Name Marion O'Dowd Organisation not applicable/not provided

Again, small scattered sites close to the areas where the waste is produced are the most acceptable solution. You want to keep your local site small - so make less waste.

6. Officer Response.

Support noted. The integration of waste management facilities into the urban extensions would allow waste from these developments and the wider Gloucester and Cheltenham area to be treated close to source in line with national and regional policy. However, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the Government's intention to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

As in Q6.

8. Officer Response.

see reponse to Q6

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney	X		
3. Land at Lydney Industrial Estate, Lydney	X		

10. Please give a reason for your answers to Question 9.

Cannot see any reason to exclude any one of them.

10. Officer Response.

Support noted.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

As in Q6.

12. Officer Response.

See previous response.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No, though I suspect there are many if we needed to look.

13. Officer Response.

Number 262 Type IND Name Marion O'Dowd Organisation not applicable/not provided

Noted

14. Do you have any comments on the Executive Summary?

No mention is made in the whole document of a large scale incinerator. This would be unacceptable irrespective of its siting.

14. Officer Response.

Comment noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.

15. Do you have any comments on Section 1?

No.

15. Officer Response.

noted

16. Do you have any comments on Section 2?

As in Q14, the method of waste disposal is the priority, then elect the most suitable site. Incineration should not be an option under consideration.

16. Officer Response.

Comment noted. Please see response to Q14.

17. Do you have any comments on Section 3?

As in Q16.

17. Officer Response.

See previous response.

18. Do you have any comments on Section 4?

As in Q16.

18. Officer Response.

Comment noted. Please see previous response.

19. Do you have any comments on the Sustainability Appraisal reports?

As in Q16.

19. Officer Response.

See previous response.

20. Do you have any comments on the Habitat Regulations report?

As in Q16.

20. Officer Response.

Number 262 Type IND Name Marion O'Dowd Organisation not applicable/not provided

See previous response.

Number 264 Type IND Name Beryl V O'Dowd Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Small scattered units will function better and be less disruptive.

2. Officer Response.

Comment noted. The site options consultation paper identifies 13 potential sites, 10 within Zone C, 3 outside Zone C. Views are invited on using a combination of different sites. The consultation makes it clear that whilst some of the sites are capable of providing a one-site solution, it may be that strategic waste management of municipal waste comes forward on several different sites. The council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the county. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. The advantages and disadvantages would be investigated further during procurement process.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X		
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre	X		
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester	X		
8. Nastend Farm, Stroudwater Business Park	X		
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West			

4. Please give a reason for your answers to Question 3.

Any of these could support a small unit. None would be suitable for one vast unit.

4. Officer Response.

Support for sites noted. The site options consultation identifies 13 sites, 10 within Zone C and 3 outside. The questionnaire invited views on the relative merits of these sites as well as the relative merits of using a combination of different sites. At this stage it is not known whether residual municipal waste in Gloucestershire will be managed at one site or several sites. The council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the

Number 264 Type IND Name Beryl V O'Dowd Organisation not applicable/not provided

procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the county. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. The advantages and disadvantages would be investigated further during procurement process.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Agree

6. Please give a reason for your answer to Question 5.

Put the treatment facilities as close as possible to where the waste is produced.

6. Officer Response.

Support noted. The integration of waste management facilities into the urban extensions would allow waste from these developments and the wider Gloucester and Cheltenham area to be treated close to source in line with national and regional policy. However, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the Government's intention to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

As Q6

8. Officer Response.

see response to Q6

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney	X		
3. Land at Lydney Industrial Estate, Lydney	X		

10. Please give a reason for your answers to Question 9.

As Q4

10. Officer Response.

See previous response.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

Number 264 Type IND Name Beryl V O'Dowd Organisation not applicable/not provided

As Q4

12. Officer Response.

See previous response.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

I am sure there would be many if one had to look for them.

13. Officer Response.

Noted

14. Do you have any comments on the Executive Summary?

The method of disposal should be decided before the site. Composting, recycling and recovery - all good. But a big NO to lange-scale incineration, wherever the site.

14. Officer Response.

Comment noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW).The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.

15. Do you have any comments on Section 1?

As Q14.

15. Officer Response.

See previous response.

16. Do you have any comments on Section 2?

As Q14.

16. Officer Response.

See previous response.

17. Do you have any comments on Section 3?

As Q14.

17. Officer Response.

See previous response.

18. Do you have any comments on Section 4?

As Q14.

18. Officer Response.

Please see previous response.

19. Do you have any comments on the Sustainability Appraisal reports?

Number 264 Type IND Name Beryl V O'Dowd Organisation not applicable/not provided

As Q14.

19. Officer Response.

See previous response.

20. Do you have any comments on the Habitat Regulations report?

The county should not consider bids that involve large scale incineration. Better technical options are now available, and to put an industrial-scale incinerator anywhere in the Vale would be a tragedy for our landscape. It would be visible from a vast distance, and nothing could effectively conceal it.

20. Officer Response.

Comment noted. Please see response to Q14 in relation to incineration. Notwithstanding the above, the visual impact of any type of facility will be carefully considered through the planning process. The use of effective design, layout and landscaping can help to reduce the visual impact of any facility.

Number 294 Type IND Name Michael O'Dowd Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

I believe several modest sites to be preferable to one vast one. Most will probably fall withiin zone C, but I would not exclude some sites in other areas.

2. Officer Response.

Comment noted. The site options consultation paper identifies 13 potential sites, 10 within Zone C, 3 outside Zone C. Views are invited on using a combination of different sites. The consultation makes it clear that whilst some of the sites are capable of providing a one-site solution, it may be that strategic waste management of municipal waste comes forward on several different sites. The council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. The advantages and disadvantages would be investigated further during procurement process.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X		
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre	X		
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester	X		
8. Nastend Farm, Stroudwater Business Park	X		
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West			

4. Please give a reason for your answers to Question 3.

There is no site that I would exclude.

4. Officer Response.

Support for sites noted.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

6. Please give a reason for your answer to Question 5.

The nearer the site is to where the waste is actually produced, the better. Multiple sites are therefore preferable.

Number 294 Type IND Name Michael O'Dowd Organisation not applicable/not provided

6. Officer Response.

Support noted. The integration of waste management facilities into the urban extensions would allow waste from these developments and the wider Gloucester and Cheltenham area to be treated close to source in line with national and regional policy. However, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the Government's intention to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

The nearer the sites are to where the waste is actually produced, the better. Several small sites still preferable to one vast one.

8. Officer Response.

Comments noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney	X		
3. Land at Lydney Industrial Estate, Lydney	X		

10. Please give a reason for your answers to Question 9.

Cannot see a reason to exclude any one site.

10. Officer Response.

Support noted.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

Smaller distances for waste to travel. As above.

12. Officer Response.

Support noted.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

Number 294 Type IND Name Michael O'Dowd Organisation not applicable/not provided

No.

13. Officer Response.

Noted

14. Do you have any comments on the Executive Summary?

We are only talking about where the plant should be sited. The nature of the plant is vastly more important. I would be very strongly opposed to any solution that involved industrial scale incineration, irrespective of the site.

14. Officer Response.

Comment noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.

15. Do you have any comments on Section 1?

Again, the method of waste disposal is more significant than the situation - large scale incineration is not acceptable.

15. Officer Response.

Comment noted. Please see response to Q14.

16. Do you have any comments on Section 2?

Again, incineration is never mentioned in this document, but would be unacceptable as part of any long-term solution.

16. Officer Response.

Comment noted. Please see response to Q14.

17. Do you have any comments on Section 3?

Good presentation. I would personally favour several smaller sites rather than one vast one. The Vale has had enough eyesores planted in it in the past - smaller sites are more easily concealed.

17. Officer Response.

Comment noted. The site options consultation paper identified 13 sites including 10 within Zone C and 3 outside. This included sites in all Districts/Boroughs other than Cheltenham, where no suitable sites were available. Views were invited on whether a combination of sites should be used. At the present time no decision has been made on whether residual municipal waste will be managed at one large facility or at several smaller sites. The council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the county. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility

Number 294 Type IND Name Michael O'Dowd Organisation not applicable/not provided

and scalability. The advantages and disadvantages would be investigated further during the procurement process. In terms of visual impact, all sites have been subjected to an initial landscape appraisal. Should a detailed proposal come forward on any of the sites this would need to be supported by a robust design and access statement and probably a separate landscape assessment in order to identify any potential issues with regard to landscape impact and how this might be overcome.

18. Do you have any comments on Section 4?

Industry should be made aware that tenders involving large scale incineration will not be successful. It is not good enough for the county to take the stance of being neutral on the technology involved.

18. Officer Response.

Comment noted. The type of technology chosen has no direct bearing on the delivery and implementation element of the WCS (the principles of which will apply regardless of which technology or technologies come forward). Please also see response to Q14.

19. Do you have any comments on the Sustainability Appraisal reports?

No.

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

The problems involved with the disposal of incinerator waste within the county should already be an adequate warning.

20. Officer Response.

Comment noted. Please see response to Q14. Notwithstanding the above, incinerator waste (bottom ash and fly ash) is currently landfilled at Wingmoor Farm East in a site that highly controlled and regulated through planning and Environment Agency permits.

Number 23 Type PC Name Kathryn Oakey Organisation Uckington Parish Council

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

We do not agree that the WCS should focus on Zone C. Waste is created by everyone in the county and it is not appropriate to designate some areas as being too valuable to accommodate any form of waste management facility. We need to look for small-scale facilities to deal with recycling and residual waste closer to the source. By focusing on only Zone C the WCS would mean waste traveling long distances to large facilities concentrated in only a few, or even one location Even if transfer stations are used to bulk up loads during local collections, the total mileage traveled by the waste to its final destination must be considered. We must move towards a solution where communities deal with their own waste rather than accept the attitude that some are too sensitive to be considered. If all land outside Zone C is too sensitive for use relating to waste management, it must be too sensitive for any form of development at all, which is clearly not the case. It is possible to design small units sensitively attuned to the location chosen. We consider that the WCS places so much emphasis on using sites that are already waste sites namely Wingmoor Farm Sites. It is impossible to comment properly on the merits of the 10 specific sites in Zone C when we have no idea what is being proposed to go on these sites. From our knowledge of the Residual Project, we conclude that until the final decision has been made and the contract awarded we cannot tell whether we are being asked to consider if these sites are suitable for one large Incinerator, a combination of technologies such as a mechanical and biological treatment plant; a network of smaller facilities to include recycling, composting, etc. Without any idea of the nature or the scale of the proposed activity, it is therefore impossible to say if a site is appropriate. Our comments can therefore be based only on our current knowledge of the experiences of our Parishioners who live to the south side of the combined sites of Wing moor Farm.

2. Officer Response.

Comments noted. Dealing with each point in turn. Strategy - It is essential that the WCS presents a clear spatial strategy setting out what will be built and where. The designation of Zone C is consistent with national and regional policy and avoids the Cotswolds AONB and large areas of floodplain. The designation of Zone C does not mean that proposals outside this area cannot come forward, indeed the site options consultation paper identifies 3 sites outside Zone C. Network of small-scale facilities - In terms of developing a network of smaller facilities, the site options consultation paper identifies 13 potential sites, 10 within Zone C, 3 outside Zone C. Views were invited on using a combination of different sites. The consultation makes it clear that whilst some of the sites are capable of providing a one-site solution, it may be that strategic waste management of municipal waste comes forward on several different sites. The council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the county. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. The advantages and disadvantages would be investigated further during procurement process. Technology - With regards to technology, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.

Number 23 Type PC Name Kathryn Oakey Organisation Uckington Parish Council

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

We are disappointed to see three sites (seven areas) proposed at Wingmoor, in the light of our earlier comments regarding the need to move away from centralised, large facilities to a system of each locality taking responsibility for its waste. Wingmoor has become a huge collection of waste activities more by default than design. Because planning law dictates that each application must be considered on its own, regardless of what else maybe in existence or proposed, Wingmoor has been able to grow through a series of incremental developments each creating "only slight" impacts. The accumulation of these "slight" impacts has resulted in very significant impacts, which are, becoming the justification for continuing and adding new waste management operations in this area. We are very concerned that a continued policy of concentrating waste related activities on, or close, to existing sites has led to one single area being the focus for the majority of not only Gloucestershire's waste, but a significant percentage of the UK's hazardous waste. The Wingmoor sites have had a massive impact on the greenbelt in which all three of the proposed WCS sites are located. We believe that it is equally important to protect what is left of the green belt land around the existing Wingmoor sites, as it is to protect the Cotswold Area of Outstanding Natural Beauty (AONB). We are therefore particularly concerned to see even more areas of the green belt being put forward in Areas A and C at Wingmoor Farm West it is simply unsustainable to increase the number of traffic movements and levels of disamenity caused by the waste operations. Other sites in the WCS were rejected because of the unsuitability of access. It is only the presence of existing operations that make Wing moor "suitable" and we believe it is quite unacceptable to drive forward a policy of further development on the basis that operations are already in existence, no matter how negative an impact they are having on the area. The Wing moor sites and their access roads are very close to large numbers of residences.15,OOO people live within 3 km of Wingmoor Farm. Disamenity including traffic, noise, dust, flies, scavenging birds, landfill gas odours and composting odours, caused by the existing waste sites. The Environment Agency Incident Reports catalogue month after month, year on year complaints about adverse odours and flies around the Wingmoor sites. Concerns regarding the impact of the Wingmoor sites are such that the Health Overview and Scrutiny Committee undertook a review. Their report has not yet been published and we consider it premature to recommend the further use of land at Wing moor until their findings are complete. Similarly, the Community Health Impact Assessment being facilitated by NHS Gloucestershire was set up specifically because of the level of concern. This piece of work is not yet complete. Until this has been completed and the findings reported to HOSC, we do not believe that the Wingmoor, Farm sites should be considered. The Joint Core Strategy (JCS) now under consultation includes land northwest of Cheltenham for significant development for 5000 homes running along the south side of all the sites. In fact a planning application for these houses is expected this month. The proximity of the proposed houses and allotments to an existing hazardous waste site and a 50 000 tonne proposed new residual waste facility would be wholly unacceptable. PPS 10 is clear regarding the provision of waste management: Planning authorities should ensure that new development makes sufficient provision for waste management and promote designs and layouts that secure the integration of waste management facilities without adverse impact on the street scene or, in less developed areas, the local landscape. We believe it is premature to consider any of the sites before we know what technology is being proposed for the county's residual waste. As these new technologies are not dependent on using the landfill site which is in the Greenbelt. New process should be sited close to where the waste is arising. Wingmoor Farm could therefore be re-instated to a green belt, green field site.

4. Officer Response.

Comments noted. The re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community. Whilst it is acknowledged that the Green Belt

Number 23 Type PC Name Kathryn Oakey Organisation Uckington Parish Council

should generally be protected, PPS10, emphasises that local authorities should 'recognise the particular locational needs of some types of waste management facilities when defining detailed green belt boundaries and, in determining planning applications'. In line with PPS10 companion guidance, should any sites within the Green Belt be specifically allocated within the WCS, it will need to be clearly indicated that they are for waste management purposes only. PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. For the Wingmoor Farm sites, the issue of local capacity was raised with the suggestion of likely improvements being needed e.g. junction improvements. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. In terms of health impact, PPS10, states that 'modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health'. Furthermore, the detailed consideration of a waste process and the implications, if any, for human health is the responsibility of the pollution control authorities. PPS10 also states that, where concerns about health are raised, waste planning authorities should avoid carrying out their own detailed assessments.rather they should ensure, through drawing from Government advice and research and consultation with the relevant health authorities and agencies, that they have any advice on implications for health.' The WPA duly sought the advice from the PCT/NHS through the site options consultation. However, it is important that waste is managed close to source and the urban areas of Gloucester and Cheltenham are where most of Gloucestershire's waste is generated. This approach is consistent with national policy in PPS10, which emphasises that planning strategies should 'provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities'. It is also pertinent to note that the companion guide to PPS10 states that, 'with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development'. With regard to the specific issues of odour and dust, these are matters that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any 'sensitive receptors'. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning conditions. Notwithstanding the above, it has been decided that on balance taking into account the fact that Area A is unallocated greenfield land within the Green Belt, has some sensitive receptors nearby to the south and that there has been no significant interest from the waste industry for strategic waste recovery raising question marks over the deliverability of a strategic waste management operation on this site, Area A will not be taken forward into the Publication WCS. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishops Cleeve Strategic Site and as such fulfilled the inclusion criteria for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). Due uncertainties concerning the availability of this land the County Council does not recommend that this site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 222 Type IND Name Andrew Oakley Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Ideally, waste sites should be based on existing sites. Where this is not possible, new sites should be situated far from heavily populated areas.

2. Officer Response.

Comment noted. A number of the sites identified in the site options consultation are already in use for waste management purposes including; Wingmoor Farm, land at Moreton Valence, land north of the Railway Triangle, Netheridge sewage treatment works and Foss Cross Industrial Estate. The re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community. In terms of new sites being located away from populated areas, clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X	X	
4. Javelin Park, Haresfield		X	
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West			

4. Please give a reason for your answers to Question 3.

Ideally, waste sites should be based on existing sites. Where this is not possible, new sites should be situated far from heavily populated areas.

4. Officer Response.

Comment noted. Please see response to Q2.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Disagree

Number 222 Type IND Name Andrew Oakley Organisation not applicable/not provided

6. Please give a reason for your answer to Question 5.

Ideally, waste sites should be based on existing sites. Where this is not possible, new sites should be situated far from heavily populated areas.

6. Officer Response.

Comment noted. Please see response to Q2.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

Ideally, waste sites should be based on existing sites. Where this is not possible, new sites should be situated far from heavily populated areas.

8. Officer Response.

Comment noted. Please see response to Q2.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney		X	
3. Land at Lydney Industrial Estate, Lydney		X	

10. Please give a reason for your answers to Question 9.

Ideally, waste sites should be based on existing sites. Where this is not possible, new sites should be situated far from heavily populated areas.

10. Officer Response.

Comment noted. Please see response to Q2.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

Ideally, waste sites should be based on existing sites. Where this is not possible, new sites should be situated far from heavily populated areas.

12. Officer Response.

Comment noted. Please see response to Q2.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

Former quarries and quarries approaching the end of their working life, in the Cotswolds.

13. Officer Response.

Although quarries have historically been associated with waste disposal (namely landfill), the site options consultation focused on sites suitable for residual waste management treatment (not landfill). Quarries do not fall within the inclusion criteria outlined in Technical Evidence paper WCS-N (with the exception of those quarries with existing waste management licenses). It is important to note that much of Cotswold District is relatively isolated and remote from populated areas and although there may be sites available in these more isolated locations, situating strategic waste management facilities in these areas would be contrary to policy laid out in PPS10 and the Regional Waste Strategy which require waste to be treated close to source in accordance with the proximity principle.

Number 28 Type IND Name Carlos Odonez Organisation not applicable/not provided

17. Do you have any comments on Section 3?

GENERAL POINTS 1) Consideration of sites divorced from broader questions of the strategic approach to waste disposal and choice of technologies involved, is clearly nonsensical and runs the serious risk of pre-empting decisions on these fundamental issues. 2) Indeed, the identification of potential sites - in the absence of a stated strategy on technologies and approach - is positively dangerous, opening up such sites to future planning initiatives by independent operators. 3) The County Council's 'technology-neutral' stance is both unsustainable and irresponsible. While its immediate concern may be the phasing out of waste disposal sites, as a public authority it must also be a local driver for strategies urgently addressing climate change and the depletion of fossil fuels. Abdicating responsibility to proposals advanced by private operators is deplorable and a dereliction of duty. TECHNOLOGIES & MODELS 4) Since the County Council has chosen not to categorically ruled out waste disposal technologies that fail to offer sustainable solutions to the problem of climate change, the suspicion must be that the authority is more than open to such technologies - perhaps having a vested interest in the shape of the Javelin Park site, obtained at enormous public expense in advance of any thorough open, public debate on the way forward. 5) If climate change and sustainability are the primary strategic considerations, then the inclusion of incineration, for example, must be challenged - as must be a centralised model of waste disposal facilities. Inclusion of such an approach will place Gloucestershire in the unhappy position of relying on a strategy that is out-dated, inefficient, involves considerable and proven health risks, and that locks us into a long-term commitment that fails to adapt to changing circumstances - from tougher regulatory regimes on what goes into waste management systems and what comes out, to greatly improved rates of recycling and reduced use of unnecessary packaging. 6) The prospect is that the inherent inefficiencies (including rates of energy recovery), health risks and inflexibility of an incinerator-based strategy will be exacerbated by a PFI arrangement that will require supplying waste at a level higher than that produced locally. Apart from the potential penalties that will fall on the public purse if that supply is not met, providing the flow of waste will involve a sub-regional supply model, involving long distance transportation of waste, and - most insidiously - an in-built disincentive to develop ambitious targets and industry-wide initiatives to reduce waste in future. 7) The potential financial, health and environmental burden of such an approach on local communities and future generations, are totally unacceptable. 8) Finally, capital-intensive solutions such as incineration, while extremely attractive to the private operators and their supporters, not only incur high initial costs, with long-term burden on the public purse - especially through the dubious vehicle of a PFI - but will lock us into inflexible 25-30 years contracts. A BETTER STARTING POINT 9) The first priority must be to make sustainability and addressing the challenges of climate change the foundations of the County's waste strategy. It has to work with industry partners and local communities to explore positive ways to set far more ambitious targets than the Council envisages to reduce, reuse and recycle waste, before it requires treatment. And it needs to recognise the potential of seeing waste as a valuable resource. 10) This approach would lead to a commitment to more sustainable technologies that address not only short-term imperatives of reducing land-fill disposal of waste, but place greater emphasiS on the contribution that collection and treatment of waste makes to climate change, the impact of 'peak oil', and the benefits of further 'greening' of the local economy. 11) Being clear about the objectives and the detailed environmental and health criteria employed to determine the desired technologies involved, has to be the premise for determining the spatial location of facilities and the infrastructure required to support the strategy. For example, a dispersed model of smaller, localised facilities, closer to the sources of waste, and more able to adapt to changing conditions, would imply a very different pattern of sites throughout the County. This would be founded on a closer sense of responsibility between local communities and the waste they produce - and the development of more sophisticated methods of collection - rather than on disassociation of that relationship and the long-distance transportation of waste. 12) Such a strategy would also take into account likely future regulatory changes requiring monitoring and control of waste and by-products generated by the method of disposal. Local communities and facility staff need to be satisfied about the minimisation and nontoxic nature of the waste being brought in for disposal and the residual waste created. 13) Smaller facilities, such as those based on proven technologies such as Mechanical Biological Treatment and Anaerobic Digestion - which not only avoid the creation of toxic waste, but are more energy efficient - could form the basis of a future local 'green economy', and better meet the needs of local industries. It would avoid the high capital costs of an incinerator, as well as the adverse visual impact on the landscape that a massive, centralised incineration facility would inevitably have. It would also put Gloucestershire at the forefront of innovative and environmentally responsible management of waste. 14)The County Council should not use the PFI model as an excuse for avoiding responsibility for a sustainable and environmentally sound strategy. The Government's revisions to the National Waste Strategy stresses the contribution waste

Number 28 Type IND Name Carlos Odonez Organisation not applicable/not provided

disposal makes to climate change, and the need to increase recycling and recover 'value' from its treatment. The PFI framework allows for a diversity of technologies and positively encourages environment-savvy approaches. The Council will also be aware that a cross-party political consensus is emerging that directly links waste disposal to the imperatives of climate change. Please let's all work together to develop a credible waste strategy that will meet present and future needs in a responsible and holistic way, related to climate change, economic opportunity, and judicious public expenditure. Divorcing the choice of sites from wider questions of purpose, technologies and outcomes makes for a form of consultation that is misleading, disingenuous and, ultimately, a major missed opportunity to make a real difference in this critical area of public policy.

17. Officer Response.

Points 1 - 3 comments noted. The choice of sites is not being considered in the absence of a strategic approach. The site options consultation clearly outlines the Council's preferred locational strategy which is focused on Zone C. This approach is supported by national and regional policy and reflects the fact that most waste is generated at Gloucester and Cheltenham. In relation to technology, the fact that the Council does not have a preferred solution is not considered to affect the choice of sites or the validity of the consultation exercise. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. Points 4 - 8 comments noted. Whilst Javelin Park was purchased by the Council and identified as the Council's reference project for the PFI bid the Council is open to the use of other sites. The purpose of the site options consultation was to identify a range of suitable, available sites that could be used for the treatment of residual municipal waste. Whilst the Council's preferred focus is Zone C, three sites were identified outside this area to provide flexibility/support through a more dispersed approach. Criteria based policy in the Publication WCS will allow for speculative proposals to come forward. With regard to climate change, this is a wider issue which the development of this solution can positively contribute. Carbon footprint is assessed as part of the life cycle analysis. GCC will ask for details of emissions management as well as any other foreseeable environmental impacts and plans to mitigate these will be requested during competitive dialogue. With regard to the issue of centralisation the site options consultation identified 13 sites from a long-list of 329 sites. This included 10 within the preferred Zone C and 3 sites outside. Views were invited on whether the focus should be Zone C, outside Zone C or a combination of the two. At this point it has not been determined whether provision will be made on one large site or several smaller sites. The council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. With regard to health risks, PPS10, states that modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health. Furthermore, the detailed consideration of a waste process and the implications, if any, for human health is the responsibility of the pollution control authorities. PPS10 also states that, where concerns about health are raised, waste planning authorities should avoid carrying out their own detailed assessments rather they should ensure, through drawing from Government advice and research and consultation with the relevant health authorities and agencies, that they have any advice on implications for health. The WPA duly sought the advice from the PCT/NHS through the site options consultation. With regard to supplying waste at a higher level than that produced locally
(i.e. importing waste) the Council endeavours to deliver a solution to manage Gloucestershire's residual waste, not waste from outside the county. To promote flexibility of the solution and further recycling above the minimum 60% target, the council would be open to views on the treatment of Gloucestershire's commercial waste. It is important to note that household waste is only 25% of the total waste produced by Gloucestershire. The potential for treating commercial and industrial

Number 28 Type IND Name Carlos Odonez Organisation not applicable/not provided

waste at some sites is acknowledged in the site options consultation paper. With regard to contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Points 9 -14 comments noted. The Publication WCS will be underpinned by the central policy strands of climate change and sustainability. The preferred locational strategy which focuses on providing strategic waste management facilities within Zone C, is consistent with national and regional waste policy allowing for most of Gloucestershire's waste which is generated in the main urban areas to be treated close to source. It also avoids locating facilities in the most flood prone parts of the County and the Cotswold AONB. With regard to waste reduction, re-use and recycling, the Council is already doing a great deal to promote higher levels. We have a strategy target of recycling and composting at least 60% of our waste by 2020. This is 10% higher than the national target over the same period. We have increased recycling rates from 14% in 2002 to 43% in 2010. With regard to the development of a dispersed model of smaller localised facilities, as explained above, the Council considered an initial long-list of over 300 sites. Of these only 13 sites were found to be suitable and available. These were included in the site options consultation with views invited on which sites or combination of sites should come forward. GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. In terms of being close to the sources of waste it is important to note that most waste is generated in Gloucestershire's main urban areas. Most of these are located in Zone C. Waste collection regimes are outside the scope of the WCS. The Council is working with partners to deliver the Joint Waste Strategy but this will take time. If necessary the WCS will be revised to take account of future changes to collection arrangements agreed through the Joint Waste Strategy. The potential role of MBT is recognised. The value of AD for certain biodegradable elements of the municipal waste stream is recognised.

Number 454 Type BUS Name C F Oldershaw Organisation Gloucester Heritage Urban

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
7. Land north of Railway Triangle, Gloucester		X	

4. Please give a reason for your answers to Question 3.

The Site Options paper identifies a total of 13 'strategic' sites (10 within "Zone C") capable of processing a minimum of 150,000 tonnes of residual municipal waste a year. One of the potential sites - site number 7 - comprises land North of the Railway Triangle at Myers Road, Gloucester, located within GHURC's designated regeneration area approved by Government in April 2004. At its meeting on the 2ih November the URC Board debated its position in relation to the above and instructed the response set out below. Presently GHURC is promoting a major residentially led mixed use regeneration of currently underutilised and derelict landholdings at Great Western Road and the 'northern triangle' site adjoining Option Site 7 as set out in its Greater Railway Triangle Masterplan. In view of its location - close to an established residential neighbourhood, Gloucester Royal Hospital and the proposed residentially led mixed use regeneration within the Railway Triangle - Gloucester Heritage Urban Regeneration Company believes that any expansion in the scale and nature of existing waste related uses in this area should be opposed. Accordingly, the Board formally resolved to: i) Object to the inclusion of the land north of the Railway Triangle at Myers Road as a 'strategic site' and request the site's deletion from the plan. ii) Advise the County Council that any future expansion of the waste activities outside the existing Allstones operational site is considered unacceptable; the Board acknowledging that this company have existing consents to process a total of 75,000 tonnes of waste material annually. iii) Endorse the City Council's consultation response in specific relation to the land north of the Railway Triangle - as resolved at the Council meeting of the 26th November and confirmed in Michael Thorpe's letter to you dated 30th November 2009.

4. Officer Response.

Comments noted. The WPA is clearly aware of the current Allstone Sand & Gravel operation and its close proximity to the Gloucester Heritage Urban Regeneration Company (GHURC) Railway Triangle site. From the WPA's perspective GHURC have yet to finalise its masterplanning process, no planning applications have been submitted and thus significant uncertainties remain in terms of what will be developed on this site. Since the site options consultation was undertaken in October 2009, the Waste Planning Authority has carefully considered all the issues related to Site 7, Land North of Railway Triangle. The site has not been taken forward into the publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 337 Type IND Name Meg Olpin Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I write to object to the use of all 13 of the sites listed for possible waste treatment in Gloucestershire. Any of the sites could be used for incineration. This is totally unacceptable because the fly ash residue created is both toxic and dangerous. The fact that it will be transported and buried will create a risk to nearby residents which is unacceptable. If the duration of incineration contracts is for any length of time (and I understand 20 plus years is a possibility) then no account of anticipated waste reduction volumes or use of newer more efficient technologies which are currently being developed can be factored in with any degree of accuracy. We need incentives to encourage people to reduce waste, recycle and reuse products. Incineration is a massive disincentive. Indeed large incinerators in other areas of the country are deemed to be a mistake. Gloucestershire should take note and look to other more green and cost effective methods of disposal. Let Gloucestershire use only proven good practice, be a leader, innovator and Centre of Excellence. Future generations will applaud our vision and cost effectiveness not bemoan our lack of courage to embrace other technology and good practice.

17. Officer Response.

With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. The 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 309 Type ENV Name David Owen Organisation Gloucestershire Geology Trust

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

The area is central to the county, minimising transport of waste. The underlying geology is mainly clays and mudstones which reduce the potential for contamination to find pathways through the ground to receptors elsewhere.

2. Officer Response.

Support noted. In terms of contamination however, it is pertinent to note that modern, well managed and regulated waste treatment facilities should offer no discernible risk. PPS10 states that modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X		X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester	X		
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West			

4. Please give a reason for your answers to Question 3.

Wingmoor Farm area is already widely used for waste and it makes sense to concentrate waste in areas rather than spreading it around the county, making it harder to manage the sites effectively. Using brownfield sites like the Railway Triangle area is sensible.

4. Officer Response.

Comment noted. The re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community. Support for the re-use of previously developed (brownfield) land noted. Prioritising the use of previously developed land is consistent with Government policy. In relation to Site 7, Land north of Railway Triangle, the site has not been taken forward into the publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network.

Number 309 Type ENV Name David Owen Organisation Gloucestershire Geology Trust

However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

6. Please give a reason for your answer to Question 5.

If there is a chance of increasing urban area, there is also the chance for increased waste produced by these areas. Therefore this needs to be considered when planning for waste treatment.

6. Officer Response.

Support noted. The WCS has a role to play in ensuring all new development is underpinned by appropriate waste management infrastructure (e.g. recycling facilities). The site options consultation paper however focuses on identifying a site or sites suitable for accommodating a strategic waste management facility and there has been no interest from either waste operators or the developers leading the urban extensions in providing this type of facility as part of the development. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

Other sites may need to be identified and held in reserve, but this should be very carefully planned and thought through to ensure that there is no possibility of the needs being met within Zone C first.

8. Officer Response.

Comment noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. These sites will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney	X		

Number 309 Type ENV Name David Owen Organisation Gloucestershire Geology Trust

10. Please give a reason for your answers to Question 9.

Foss cross is an existing facility with an infrastructure already in place and can provide the amenity for the Cotswolds area. Lydney Industrial Estate can provide the amenity for the Forest of Dean area.

10. Officer Response.

Support for Foss Cross and Lydney Industrial Estate noted, but see previous comments.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

It would reduce transport distances for waste.

12. Officer Response.

Support noted.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No

13. Officer Response.

Noted.

14. Do you have any comments on the Executive Summary?

A good summary.

14. Officer Response.

Support noted.

Number 218 Type IND Name G Page Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Proximity to centres of high population - this will help to reduce transportation costs To avoid flood plain Consistent with Government policy Agree with reasons given in 3.28 of Consultancy Document

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X	X	
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester	X		
8. Nastend Farm, Stroudwater Business Park	X		
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West			

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

6. Please give a reason for your answer to Question 5.

Waste treatment facilities should ideally be as close to urban developments as possible as long as they fall in line with 3.28

6. Officer Response.

Support noted. The integration of waste management facilities into the urban extensions would allow waste from these developments and the wider Gloucester and Cheltenham area to be treated close to source in line with national and regional policy. However, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the Government's intention to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I'm not sure/I don't know

8. Please give a reason for your answer to Question 7.

Number 218 Type IND Name G Page Organisation not applicable/not provided

Due to traffic problems on the Forest of Dean routes into Gloucester and then onto Zone C sites it is conceivable that further sites in the Forest area should be considered.

8. Officer Response.

Comment noted. PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by a further highway assessment with any necessary mitigation (e.g. junction improvements) clearly identified as site-specific requirements. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

Have insufficient knowledge of these sites to make any constructive comment.

10. Officer Response.

noted

11. Do you support the approach of using a combination of sites within and outside Zone C?

I'm not sure/I don't know

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No

13. Officer Response.

Noted

14. Do you have any comments on the Executive Summary?

No - all sections seem to have been thoroughly investigated

14. Officer Response.

noted

15. Do you have any comments on Section 1?

No

15. Officer Response.

noted

16. Do you have any comments on Section 2?

No

16. Officer Response.

Number 218 Type IND Name G Page Organisation not applicable/not provided

noted

17. Do you have any comments on Section 3?

No

17. Officer Response.

Noted

18. Do you have any comments on Section 4?

No

18. Officer Response.

Noted.

19. Do you have any comments on the Sustainability Appraisal reports?

No

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

No

20. Officer Response.

Noted.

Number 94 Type IND Name Josephine Parsons Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Its in a built-up area. Should be put in the middle of nowhere, also there's enough industry here in Ashchurch.

2. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. Notwithstanding the above, the site has not been taken forward into the Publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch		X	
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

Same as Q1 - 2

4. Officer Response.

Number 94 Type IND Name Josephine Parsons Organisation not applicable/not provided

See previous response.

6. Please give a reason for your answer to Question 5.

haven't seen the document

6. Officer Response.

Comment noted.

Number 135 Type IND Name Gary Parsons Organisation Sport England

17. Do you have any comments on Section 3?

It is note clear whether any of the potential sites form part of, or constitutes a playing field as defined in the 1996 Statutory Instrument No.1817 (as amended by 2009 Statutory Instrument No.453). If they do, Sport England would consider the allocation in the light of its playing fields policy http://www.sportengland.org/facilities__planning/putting_policy_into_practice/playing_fields.aspx. Our policy relates to all or any part of a playing field or land last used as a playing field, or land allocated for use as a playing field in an adopted or draft deposit local plan. The aim of this policy is to ensure that there is an adequate supply of quality pitches to satisfy the current and estimated future demand for pitch sports within the area. The policy seeks to protect all parts of the playing field from development and not just those which, for the time being, are laid out as pitches. Sport England opposes such developments in all but exceptional cases, whether the land is in public, private or educational use. It is our policy to oppose development on playing fields unless at least one of the five exceptions as set out in our policy are met, which have been incorporated into the revised Planning Policy Guidance note 17 'Planning for Open Space, Sport and Recreation' (ODPM, July 2002). The Policy states that: Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of, all or any part of a playing field, or land last used as a playing field or allocated for use as a playing field in an adopted or draft deposit local plan, unless, in the judgement of Sport England, one of the specific circumstances applies. Reason: Development which would lead to the loss of all or part of a playing field, or which would prejudice its use, should not normally be permitted because it would permanently reduce the opportunities for participation in sporting activities. Government planning policy and the policies of Sport England have recognised the importance of such activities to the social and economic well-being of the country. Sport England opposes such developments in all but exceptional cases, whether the land is in public, private or educational use. It is our policy to oppose development on playing fields unless at least one of the five exceptions as set out in our policy are met: E1 A carefully quantified and documented assessment of current and future needs has demonstrated to the satisfaction of Sport England that there is an excess of playing field provision in the catchment, and the site has no special significance to the interests of sport. E2 The proposed development is ancillary to the principal use of the site as a playing field or playing fields, and does not affect the quantity or quality of pitches or adversely affect their use. E3 The proposed development affects only land incapable of forming, or forming part of, a playing pitch, and does not result in the loss of, or inability to make use of any playing pitch (including the maintenance of adequate safety margins), a reduction in the size of the playing area of any playing pitch or the loss of any other sporting/ancillary facility on the site. E4 The playing field or playing fields which would be lost as a result of the proposed development would be replaced by a playing field or playing fields of an equivalent or better quality and of equivalent or greater quantity, in a suitable location and subject to equivalent or better management arrangements, prior to the commencement of the development. E5 The proposed development is for an indoor or outdoor sports facility, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss of the playing field or playing fields.

17. Officer Response.

Comments noted. None of the site options would involve the loss of a playing field.

Number 260 Type IND Name B Partridge Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I wish to register my disapproval to the Allstone site being extended to cater for yet more household and commercial waste. To have such facilities in built-up areas is in my mind ridiculous, especially when there is plenty of land outside the city where very few people live, or none at all. This will interfere with the quality of life of so many local residents. I ask you to refuse permission for such a facility and ask the council to choose a more suitable site.

17. Officer Response.

Comments noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. Having regard to all of the issues raised and taking particular account of likely deliverability and the need to manage waste close to source, it has been decided to take this site forward as a strategic site allocation within the Publication WCS. Notwithstanding the above, the site has not been taken forward into the Publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the Publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 236 Type IND Name Mark Pavey Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
7. Land north of Railway Triangle, Gloucester		X	

4. Please give a reason for your answers to Question 3.

Site 7 is surrounded by residential areas and is next to a hospital, park and schools. The access roads are not suitable for the increase in heavy traffic that would occur. The proposed development would have too great a negative environmental impact.

4. Officer Response.

Comments noted. Site 7 has not been taken forward into the Publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the Publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 315 Type IND Name John Peacey Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I understand the Gloucestershire County Council are conducting a consultation review of 13 possible sites within the county for waste disposal. However I cannot find any reference to what is proposed with respect to the methods and the technologies which might be utilised on these sites. I therefore am writing to object to the use of all 13 sites listed for the possible development of waste treatment within Gloucestershire. I am led to understand that any of these proposed sites may be used for the incineration of waste. I have three major concerns relating to the use of these sites for incinerations and I would therefore like to express my opposition to these plans. First I understand that the proposal is to award incineration contracts for periods of at least 24 years therefore locking the county into this solution irrespective of any future reductions in the volume of waste or enabling the use of the more efficient and effective technologies which are currently under development. The use of incinerators act as a disincentive to reduce, reuse and recycle our waste and therefore the county will not be continuing to progress it's already considerable success in the recycling of the generated waste. Finally my objection to incineration is that they create toxic fly ash residue which has to be transported and buried creating a considerable risk to nearby residents which I find wholly unacceptable.

17. Officer Response.

Comments noted. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes.

Number 420 Type IND Name Hermann Pehl Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I write to object to the use of all 13 of the sites listed for possible waste treatment in Gloucestershire on the grounds that: Any of these sites could be used for incineration, which I oppose. Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. The long term costs to the taxpayer will be higher with incineration. Incinerators act as a disincentive to reduce, reuse and recycle. The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. Large incinerators in other areas of the country are already deemed to be a mistake.

17. Officer Response.

Comments noted. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 70 Type BUS Name Tim Perkins Organisation Viridor

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Viridor support the Council's proposals to focus the search for strategic waste sites within the defined Zone C. The use of strategic waste sites within Zone C is consistent with a variety of government policy documents. Planning Policy Statement 10 (PPS10) statement and its companion guide set out key planning objectives relevant to Gloucestershire including driving waste management up the waste hierarchy and treating waste as a resource; provision of waste management facilities to meet the needs of communities and help implement the national waste strategy; disposing of waste without harming human health and the environment; and enabling waste to be disposed of in one of the nearest appropriate installations. The provision of strategic waste facilities within Zone C offers the potential to achieve the principles set out within PPS10.

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
4. Javelin Park, Haresfield	X		

4. Please give a reason for your answers to Question 3.

At this stage, Viridor have not fully evaluated the other sites but consider Site 4, Javelin Park suitable for the treatment of residual household waste. Viridor consider Site 4 (Javelin Park, Haresfield) to be suitable for the treatment of residual household waste and potentially Commercial & Industrial (C&I) waste arisings. The site comfortably meets the size criteria at a total area of approximately 11 hectares and in turn offers the potential to act as a strategic waste management facility. Furthermore the Javelin Park site is considered suitable for a strategic waste facility as it meets the key planning policy principles of Planning Policy Statement 10: Planning for Sustainable Waste Management (PPS10) and the Regional Spatial Strategy. The Javelin Park site offers outstanding access to Gloucestershire's Advisory Freight Route. To the west of the site (within 100m) is Junction 12 of the M5 motorway, whilst the B4008 bounds the site to the east and runs north/south linking the junction of the A38 and A430. Given the Javelin Park's proximity to the M5, traffic impacts on rural roads and residential areas will be minimised. The proposed site at Javelin Park is well located in relation to waste arisings in Gloucestershire, being situated close to Cheltenham and Gloucester; and is therefore consistent with the PPS10 and emerging Regional Spatial Strategy (RSS). The site's location and its potential to provide for above 150,000 tonnes of waste per annum means that it is suitably placed to deal with not only existing waste arisings but increased arisings caused by proposed urban extensions within Gloucestershire. The site is made up of vacant brownfield land and therefore accords with PPS10, which advocates the use of previously developed land for potential sites for waste management. Furthermore, the site already has detailed planning permission for a distribution warehouse development. This therefore demonstrates that the Planning Authority consider Javelin Park a suitable site upon which to develop a large industrial development. The Javelin Park site accords with a number of local planning policies. The Stroud Local Plan, adopted in November 2005, identifies the site as a key employment location for B8 usage and the land is brownfield. This confirms the site's suitability for development and the role a strategic waste site could play in providing local employment. A sustainable waste management use offers the potential to be similar in scale to the B8 development already permitted on the site. This existing permission provides for buildings of up to 34,000m2 of floorspace with a maximum ridge line height of 15.7m. A strategic waste facility of a similar scale to those buildings already permitted would therefore be acceptable. Furthermore any proposed facility at Javelin Park will also contribute to the physical and economic regeneration of the area through the re-use of a currently vacant site and by creation of primary and secondary jobs in line with policy EM4 of the Stroud Local Plan. The site was previously allocated in the Gloucestershire Waste Local Plan. Whilst the relevant Waste Local Plan policies were not 'saved' and carry limited weight, there is previous policy support for the development of a waste management facility on the site. In addition, there is an area on the site, which is in the County Council's ownership. The County Council has indicated that this land is available and

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deliverable for strategic waste management use. It is therefore apparent that the land will be available and thus eliminates the risk of delay in proceeding with construction and operation of any proposed solution, once the necessary consents have been obtained. Annex E of PPS10 sets out locational criteria which the waste planning authority will use to test the suitability of sites for waste development. In terms of consistency with these criteria, the Javelin Park site, has few physical and environmental constraints. A strategic waste facility of suitable design and layout offers the potential to be sustainable and with suitable proposed mitigation for the developments would minimise harm to human health and the environment. There are few residential or other sensitive land uses in close proximity. Viridor consider that the site has few key environmental constraints. An appropriate strategic waste facility could incorporate design measures and finishes to reduce the visual and landscape impact of the scheme on short and longer distance views. A development of similar or smaller scale to the warehouse development is likely to be acceptable, whilst a larger scale development may have more significant landscape and visual impacts, particularly in relation to the AONB. With regard to flood risk, the site lies within Zone 1 of the EA Flood Map and is thus considered to be low risk. The Javelin Park site is not affected by or close to any national, regional or locally designated nature conservation sites. Development on the site is not likely to impact upon the surrounding historic environment as the nearest Scheduled Ancient Monument is approximately 750m east and the site is not located within a conservation area. The site is therefore suitable for a strategic waste facility by virtue of: its proximity to the M5, part of the Advisory Freight Route; location in relation to waste arisings in the County's strategic settlements; makes use of previously developed land; having very few sensitive receptors in close proximity; and having a lack of key environmental constraints, such as landscape, archaeological and ecological designations. Viridor believe that the size of the Javelin Park site enables the site to have capacity for a strategic waste facility. Viridor consider that the site offers the capacity to both treat the 150,000 tonnes of residual municipal waste outlined in the Site Options Consultation document and in addition provide for a significant portion of Commercial & Industrial (C&I) waste. It is therefore considered that the site offers the potential to deal with the municipal waste requirements within Gloucestershire and additional C&I waste arisings and is thus deliverable to the scale set out in the Waste Core Strategy Site Options Consultation (sections 3.3-3.5). We do not make specific comments on the suitability of the other sites except to note the emphasis in PPS12 on sites needing to be demonstrably deliverable and to note that certain of the proposed sites are in the Green Belt where very special circumstances would need to be demonstrated. Guidance on strategic sites from the Planning Inspectorate is that they should only be allocated where there is a high level of certainty regarding their deliverability.

4. Officer Response.

Support for Javelin Park noted. With regard to delivery, all sites included in the site options consultation paper have landowners that are interested in pursuing a waste management facility on their site. They were all 'deliverable'. Other sites were excluded from the process on the basis that they are undeliverable. With regard to development in the Green Belt, whilst it is acknowledged that the Green Belt should generally be protected, PPS10, emphasises that local authorities should 'recognise the particular locational needs of some types of waste management facilities when defining detailed green belt boundaries and, in determining planning applications'. In line with PPS10 companion guidance, should any sites within the Green Belt be specifically allocated within the WCS, it will need to be clearly indicated that they are for waste management purposes only.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

6. Please give a reason for your answer to Question 5.

Viridor consider that such proposed development is unlikely to generate sufficient additional waste arisings to justify the identification of a major waste site in these areas.

6. Officer Response.

Comment noted. The potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the

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general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

In order to deliver sustainable waste management within the County, a network of facilities will be required including supporting infrastructure outside of Zone C. There is a need to ensure that there are sufficient sites to serve the whole County including rural areas. In the interests of sustainable transport and minimising impacts on rural roads there are benefits in providing facilities which support the larger strategic facilities, for example transfer stations. The consultation identifies only 3 sites, two of which are in Lydney. Viridor recognise that policy constraints in some parts of the County (e.g. the Cotswolds AONB) make this process more difficult; however the Council should establish a policy framework which allows for such facilities, in suitable locations, to help deliver sustainable waste management. Ultimately this would enable Gloucestershire to deliver a network of waste facilities in line with national policy.

8. Officer Response.

Comment noted. Whilst the Council's preferred strategy is to provide strategic waste management facilities within Zone C, there is likely to be a role for sites outside this area e.g. smaller scale provision or supporting infrastructure e.g. waste transfer. On balance having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the publication Waste Core Strategy (WCS). It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the Waste Core Strategy (WCS) national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

At this stage, Viridor have not fully evaluated the identified sites.

10. Officer Response.

Noted

12. Please give a reason for your answer to Question 11.

Viridor support the approach of using a combination of sites from within and outside Zone C. As set out in Question 8, Viridor support an approach that allocates main strategic waste sites in Zone C but believe that there is potential for a need for additional sites to provide supporting waste infrastructure to the strategic facility. This could be in the form of for instance a network of transfer stations. Such a solution could enable Gloucestershire to deliver sustainable development through driving waste management up the waste hierarchy then such a solution would be in line with national policy.

12. Officer Response.

Support noted. See previous response.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

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Not at this time

13. Officer Response.

Noted.

14. Do you have any comments on the Executive Summary?

Clear and concise

14. Officer Response.

Support noted.

15. Do you have any comments on Section 1?

Clear and concise

15. Officer Response.

Support noted.

16. Do you have any comments on Section 2?

Overall this provides a good summary of the principal influences on the Waste Core Strategy. Viridor note that there is reference in the document to the Residual Waste Project , the Council's process for procuring a municipal waste treatment contract and deliver diversion from landfill. It should be noted that Javelin Park is the Authority's reference site in this process. Given the requirements of PPS10 that the Waste Planning Authority must have regard to the interests of the Waste Disposal Authority, it is important that the Authority's reference site is identified as a strategic waste site.

16. Officer Response.

Support for Javelin Park noted.

17. Do you have any comments on Section 3?

In general terms this provides a clear and concise description of the process undertaken to identify and evaluate site options.

17. Officer Response.

Support noted.

18. Do you have any comments on Section 4?

In light of our comments on Questions 8 and 12, Viridor consider that it is important to maintain flexibility in the Core Strategy which allows a sufficient network of supporting infrastructure to come forward across the County. This should include appropriate criteria based policies which allow other appropriate sites to come forward where they serve specific needs in different parts of the County, not met by the strategic sites identified. It is also noted that the Core Strategy is to provide a framework for the future planning of waste management up to 2026. Given the length of this period the Plan should incorporate flexibility with regard to both its policies and the sites identified.

18. Officer Response.

Comments noted. The importance of providing a suitable degree of flexibility is noted and is recognised in Section 4 and Appendix 4 and 5 which refer to the issue of contingency and the types of action that will be taken by the Council and its partner organisations if policies and proposals do not come forward as expected (including sites). This will be further developed in preparing the Publication WCS. The publication WCS will also include criteria-based policies as appropriate allowing for further flexibility and to cater for speculative, unplanned development as and when it comes forward. The plan period will cover a period of at least 15 years from the date of adoption.

Number 70 Type BUS Name Tim Perkins Organisation Viridor

19. Do you have any comments on the Sustainability Appraisal reports?

No comment

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

No comment

20. Officer Response.

Noted.

Number 38 Type IND Name A Perry Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
2. Areas A, B & C at Wingmoor Farm West		X	

4. Please give a reason for your answers to Question 3.

I am writing to express my concern and bewilderment at the decision to use the land presently occupied by the Cheltenham and District Clay Club, for waste processing. This club has been operating for over 30 years and is an important part of the social infrastructure of the area. I would also challenge this plan with the following questions:- What provision and compensation will be made for shooting facilities if this site is used by the council and when?; The area is semi rural with too much traffic from lorries already. Why more traffic?; What compensation will the local residents receive when this traffic and waste recycling area effect the value of their property; Why would the area be burdened further with more waste recycling, hasn't it got enough?; This site does not have wide roads for good access and is not close to the motorway, so why this site?; Other sites are already vacant, so why this site?; The club site is the only site with a social activity regularly on it in all seasons; Many years of hardwork and investment has gotten the club and ground to its' present situation. Over 400 trees have been planted and the ground managed to enhance the layout. This is not replaceable overnight. I would ask that the decision to use this site is reviewed sensibly and reasonably.

4. Officer Response.

Comments noted. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the 'inclusion criteria' for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that his site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 450 Type ENV Name Simon Pickering Organisation Gloucestershire

17. Do you have any comments on Section 3?

We support the requirement to take a strategic approach to waste management in Gloucestershire. We would wish to see the most sustainable solutions, in particularly those that minimises emission of carbon dioxide and if possible make a contribution to renewable energy generation within the county. We would wish to see solutions that are consistent with national climate change legislation and contribute to local renewable energy strategies and carbon dioxide reduction targets. We recognises that the technologies for dealing with residual waste has yet to be agreed and notes that this may mean certain methods may be limited to particular sites. However as the authority has, probably quite rightly at this stage, expressed the view that it is technology neutral, this does cause some significant problems in terms making a full assessment of the site in term of sustainability, the European landfill directive, national climate change legislation and local carbon dioxide reduction targets. In considering the proposed sites consultation documents and the technical annexes we note that it is not possible to fully access the potential of each site due the lack of information on key issues. In particular we notes within the technical evidence paper WCS-N and the main consultation document there is no reference to the proximity of gas main or facilities to feed syngas into the national gas grid for each site. Natural Gas is one of the most important fuels in the UK, it is the major source of household heating in UK and gas fired powers stations generate approximately 45% of electricity used in UK. The creation of syngas from biodegradable waste will never replace all the current natural gas. However as the proportion of gas imported from overseas sources increases over the next ten years, locally generated sources will become increasingly important and increasingly valuable. We note that both major political parties are promoting the creation and use of syngas and the partnership would advise that the authority seriously considered the opportunities that dealing with large amounts of the feed sock for syngas plants may present, particularly financial opportunities, when considering the technologies selected. If rather that generating the more valuable syngas, the county in partnership with it's preferred contractor use a technology that resulted in using the biogas to generate electricity there would be a need to feed any electricity surplus to the requirements of the plant itself, back into the national grid. While it seems likely that there are suitable grid connections at or close to all of the proposed sites it would be exceeding helpful in assessing the sites whether each site does have, or has the potential for a suitable grid connection. We also notes that it is likely, not matter what technology is selected it is likely that excess heat may be generated presenting the opportunities for use of heat for area heating of new homes or new business or factory developments. Therefore in considering the suitability of each site there is need to know the likely future use of adjacent land. Local plans will indicate area close to the proposed sites allocated for new developments. We note that although the consultation document and technical evidence paper considered ecology and biodiversity as a constraint, the lack of detail on technologies limited the value of any appropriate assessment under the European Habitat Regulations. Also the assessment to recognise that a key role of the UK Biodiversity Action Planning, as noted in PPG9, is enhancements of biodiversity. We believe at each site there should be a consideration of the potential for biodiversity enhancements. The generally accepted meanings of the term sustainability involve improving the economy, improving the environment and improving the social benefits. It is not clear from the consultation document how the use of each particular site would benefit the economy of Gloucestershire or bring social improvements to the residents of the area or the county. We recognise that economic and social benefits are not always easy to quantify however it is important that these is issues are addressed even at broad county level for each site. Preferred sites - We note that if the production of syngas is part of the preferred technology then one central location for biodegradable waste may be required. If other technologies are considered then a number of smaller sites could be suitable. Within the 10 sites listed in zone C sites 3, 7, and 8 appear closest to the main sources of waste generation and as they are all close or within urban location are more likely to have suitable electricity and gas grid connections and could perhaps therefore be considered as most sustainable sites, although without further technical research this cannot be confirmed. Sites 5, 7 and 8 all appear to be close to land likely to be developed in the future and therefore may be considered highly suitable sites if a large amount of heat is to be generated that could be fed into area heating systems. If the technologies selected don't required large central plants then the provision of sites outside 'Zone C' in order to minimise transport requirement from larger towns elsewhere in the county may be suitable if other criteria are suitable.

17. Officer Response.

Comments noted. The importance of sustainable development, carbon reduction and renewable energy is recognised. Support for technology neutral approach noted. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific

Number 450 Type ENV Name Simon Pickering Organisation Gloucestershire

technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. The emerging importance of syngas (generated by gasification) is recognised. However, as the Council is technology neutral, other factors have been used to determine the 13 sites identified. In respect of the proximity of gas mains or other facilities suitable for connecting to the national gas grid, further evidence will be prepared in support of the CHP potential of the 13 sites prior to the publication WCS. There is legislation in place to ensure modern incinerators (and other types of thermal treatment, like pyrolysis and gasification) use the heat and power captured from the process. This can be used to generate heat and electricity to supply the local communities/businesses around a facility; this is generally known as Combined Heat and Power (CHP). However, this technology's primary function is for waste disposal and does not market itself as a primary source of heat and power generation. Such outputs are a benefit that can be harnessed from it primary waste disposal function. Where Bidders have proposed incineration as part of their solution for Gloucestershire, the Bidders will be expected to explore the possibility of CHP and ensure that the plant is CHP enabled. Incineration is currently the only proven technology to produce energy, Advanced Thermal Treatment and AD are new technologies and are not wholly proven on residual waste. In terms of the Habitat Regulations the publication WCS will be supported by a HRA report prepared by independent consultants. In terms of improving the economy, the development of new waste management facilities will create new jobs -the number of which depending on the nature and size of the proposal. In terms of social benefits, clearly such a facility will help divert waste from landfill thereby having environmental and financial benefits. The comments concerning specific sites are noted. In terms of the number of sites, at this stage it has not been determined whether provision will be made on one large site or several smaller sites. The council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. The advantages and disadvantages would be investigated further during procurement process. The potential role of sites outside Zone C is acknowledged. Whilst the Council's preferred strategy is to provide strategic waste management facilities within Zone C, there is likely to be a role for sites outside this area e.g. smaller scale provision or supporting infrastructure e.g. waste transfer.

Number 339 Type IND Name Keith Plested Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

The need is obvious

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

Unsuitable on the edge of a historic hamlet

4. Officer Response.

Comment noted. Nastend Farm has not been taken forward into the Publication WCS because although the County Council is the landowner, following discussions with the County Council's Waste Disposal Authority (WDA) it would appear that there is significant uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore, the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the Publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

6. Please give a reason for your answer to Question 5.

It's obvious

6. Officer Response.

Support noted. The WCS has a role to play in ensuring all new development is underpinned by appropriate waste management infrastructure (e.g. recycling facilities). The site options consultation paper however focuses on identifying a site or sites suitable for accommodating a strategic waste management facility and there has

Number 339 Type IND Name Keith Plested Organisation not applicable/not provided

been no interest from either waste operators or the developers leading the urban extensions in providing this type of facility as part of the development. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

Why not?

8. Officer Response.

Support noted.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney	X		

10. Please give a reason for your answers to Question 9.

Seem most suitable

10. Officer Response.

Comment noted.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

It seems an obvious answer

12. Officer Response.

Support noted.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No

13. Officer Response.

Noted.

14. Do you have any comments on the Executive Summary?

No

14. Officer Response.

Number 339 Type IND Name Keith Plested Organisation not applicable/not provided

Noted.

16. Do you have any comments on Section 2?

No

16. Officer Response.

Noted.

17. Do you have any comments on Section 3?

No

17. Officer Response.

Noted.

18. Do you have any comments on Section 4?

No

18. Officer Response.

Noted.

19. Do you have any comments on the Sustainability Appraisal reports?

No

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

No

20. Officer Response.

Noted.

Number 25 Type IND Name Nigel Potts Organisation not applicable/not provided

17. Do you have any comments on Section 3?

My wife and I attended your Waste Core Strategy Meeting at the British Legion Club in Hardwicke on Monday 9th Nov. We took note of all the information displayed and asked a number of questions and collected the Waste Strategy Core Questionnaire. After reading it, we feel we cannot fill it in fairly as the questionnaire does NOT cover which particular type of technology or method might be installed on any of the 13 possible sites for waste disposal. We would like to clearly point out that we are an opponent of the building of a 'Giant' incinerator on any and all of the 13 possible sites identified. In particular, the Javelin Park site as it is on the edge of the Cotswolds and practically within an Area of Outstanding Natural Beauty, certainly overlooked by Haresfield Beacon, National Trust land and quite definitely within an A.O.N.B! If G.C.C. is determined to build an incinerator then they should build small ones only in strategic positions around the county e.g. Lydney; Tewkesbury, Cirencester; in the 'Gloucester railway triangle; Quedgely Business park; (providing heat and power to local businesses) and a small Mechanical Biological Treatment system at Javelin Park, a system without a chimney stack! So that, COUNTRYSIDE is NOT DEFACED!! I object to the use of all sites listed to build a massive, environmentally unfriendly incinerator & particularly the Javelin Park site. There is certainly no ne d for a massive incinerator at all and if incineration was approved by Gloucestershire County Council then it would lock the county into a contract that would last at least 25 years, This would be absurd in the present situation where a flexible approach to waste management is needed with new technologies being developed, To sanction the building of a massive incinerator which would need to burn 24/7 - creating increased traffic & the pollution that goes with vehicles (particularly if a traffic accident/hold up etc,); increased C02 levels; deface the countryside, (where just above is Haresfield Beacon, National Trust land and A,O,N,B,) possibly forever; creating potential health problems & the problem of removing toxic ash - taking it to the Wingmore farm site, well no one (or body of people) should ever have the right to sanction such a monster at the detriment of those who already live close by! I have mentioned this previously to Mr, Tony Blackburn who is also personally aware of the problem, that a 'fog' sometimes envelops Haresfield Beacon;Topograph area and beyond, Two or three times a week I drive up Beacon Lane, there is NO 'fog' in Haresfield but on reaching the top it can be really qUite bad yet on driving down to Whiteshill, virtually nothing, The thought of an incinerator's waste from its stack, 'burning' into this sort of atmosphere, with the M5 also creating its own share of pollution and the prevailing South Westerly's, Well, I should not have to say any more, what a cocktail for health problems!! If that is not enough, it would be an ugly environmental landmark for all to see, just off M5, on the edge of the Cotswolds, Why are manufacturers allowed to produce plastics that create such recycling problems? It is very irritating putting some plastics out for recycling, with a recycle logo to find they are NOT collected as they are considered to be the wrong type of plastic! Metal is NOT a recycling problem, and is readily accepted at local scrap yards and a few pounds can be gained for your efforts, With a little more organisation (as is done in some European countries) this revenue could all go to a kerbside collection system, Wood is NOT a recycling problem and many people now have wood burning stoves, the burning of such wood is considered to be carbon neutral. Food is more of a problem but if considered a burden on councils then one could have a wormery, as we have and excellent fertilizer is generated, Tuffley is about to embark on such a Food collection scheme, yet Stroud D,C, cannot?? However, Stroud D,C, may soon provide mixed plastic recycling bins, Yet, Gloucester may lead the way with a waste food collection scheme, in other words an in inconsistent approach in so many different areas of Gloucestershire, Ireland years ago stopped having supermarket plastic bags, also Modbury in South Devon but here in Gloucestershire we use 1000's, daily, Incineration gives little real incentive to recycle but if after all things considered and G.C.C. genuinely cared about the impact on the county's countryside then they would forget all ideas of a massive, ugly incinerator but they might consider a few, small 'incinerators', strategically positioned around Gloucester: Lydney, Tewkesbury; Cirencester; which could be built into new housing estates providing cheaper energy for those who choose to live there e,g, land adjacent to Quadrant Business Park, providing heat and power, avoiding the need to transport waste around the county to one central point, Worcestershire have recently (after having thrown out the idea of an incinerator) opened a large, modern, indoor, recycling centre as shown recently on BBC News, providing work for up to 100 local people, The world is a rapidly changing place and to lock us into a 25 year contract makes no sense at all when recycling is beginning to really take place for many people, seeing the importance of 'reduce, reuse and recycle'- this is now a real, genuine topic of conversation, G.C.C. should start (with a few months warning) collecting black bag waste once every two weeks, then kerbside recycling collections should become weekly building on the success made, with far more to come!! If people chose NOT to recycle, then impose financial penalties on them, Gloucestershire could be a County that lead by example and one we could and should be proud of!!!

Number 25 Type IND Name Nigel Potts Organisation not applicable/not provided

17. Officer Response.

Comments noted. Dealing with each in turn. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. Javelin Park is not within the Cotswold AONB. It is visible from it, but it is not within or adjacent to it. In terms of a number of small sites, the site options consultation paper identifies 13 sites, 10 in Zone C, 3 outside Zone C. These were drawn from an initial long-list of 329 sites. With the exception of Cheltenham Borough (where no sites were available) the 13 sites consisted of sites from each of the Gloucestershire Districts. The questionnaire invited views on the suitability of these sites including whether a combination of sites from within and outside Zone C should be pursued. At the current time it is not known whether Gloucestershire's residual waste will be managed on one large site or a number of smaller sites. The Council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the County. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. The advantages and disadvantages would be investigated further during the procurement process. The contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. In terms of CO2 emissions, the heat and power that can be gained from a waste facility offers a real benefit environmentally by reducing our reliance on fossil fuels and creates a potential income of several million pounds per annum for the council. In terms of health impact, PPS10, states that "modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health'. With regard to visual impact, all sites, including Javelin Park, have been subjected to an initial landscape assessment. Javelin Park was identified as being of medium-high landscape suitability. The visual impact of any facility would be a matter for consideration during the planning process, should a detailed process come forward. Existing collection and recycling arrangements in each District/Borough do not fall within the scope of the WCS. In terms of incineration acting as a disincentive to recycling, GCC will be procuring a solution that aligns with its recycling and composting objectives. Tonnages are based on achieving 60% recycling capacity and are reviewed regularly using the most up to date figures. 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling as reality proves the contra argument. With regard to energy generation, the heat and power that can be gained from a waste facility offers a real benefit environmentally by reducing our reliance on fossil fuels and creates a potential income of several million pounds per annum for the council. Energy recovery (in the form or electricity and/or heat) will be dealt with under Solution Performance and guarantees provided by contractors and throughout the procurement process. There is legislation in place to ensure modern incinerators (and other types of thermal treatment, like pyrolysis and gasification) use the heat and power captured from the process. This can be used to generate heat and electricity to supply the local communities/businesses around a facility; this is generally known as Combined Heat and Power (CHP). However, this technology's primary function is for waste disposal and does not market itself as a primary source of heat and power generation. Such outputs are a benefit that can be harnessed from it primary waste disposal function. Where Bidders

Number 25 Type IND Name Nigel Potts Organisation not applicable/not provided

have proposed incineration as part of their solution for Gloucestershire, they will be expected to explore the possibility of CHP and ensure that the plant is CHP enabled. Incineration is currently the only proven technology to produce energy, Advanced Thermal Treatment and AD are new technologies and are not wholly proven on residual waste. There are developing markets for the outputs from AD, such as using the biogas produced but as discussed above, the process has not been proven on residual waste alone.

Number 90 Type IND Name Jennifer Potts Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

I believe there should be 4 or 5 smaller sites in various districts,making districts responsible for their own waste 1) Forest of Dean district (West), 2) Cotswold District (South East) 3) Stroud District, 4) Tewkesbury District, 5) Gloucester District. This would reduce the cost of transportation and be much more effective.

2. Officer Response.

Comment noted. Zone C includes Gloucester and Cheltenham which is where most of Gloucestershire's waste is generated. This will ensure that this waste is able to be treated close to source thereby minimising transport requirements. In terms of a network of small, local facilities the site options consultation paper identifies 13 potential sites, 10 within Zone C, 3 outside Zone C. Views are invited on using a combination of different sites. The consultation makes it clear that whilst some of the sites are capable of providing a one-site solution, it may be that strategic waste management of municipal waste comes forward on several different sites. The council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the county. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. The advantages and disadvantages would be investigated further during procurement process. Importantly, the western parts of the Forest of Dean and the south eastern parts of Cotswold District are too remote from the main waste arisings.

6. Please give a reason for your answer to Question 5.

The large urban areas make most of the rubbish so this should be dealt with on their doorstep not mine

6. Officer Response.

Comment noted. The integration of waste management facilities into the urban extensions would allow waste from these developments and the wider Gloucester and Cheltenham area to be treated close to source in line with national and regional policy. However, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

I believe there should be 4 or 5 smaller sites in various districts, 1) Forest of Dean district (West), 2) Cotswold District (South East) 3) Stroud District, 4) Tewkesbury District, 5) Gloucester District. This would reduce the cost of transportation and be much more effective.

8. Officer Response.

Support for dispersed approach noted. The site options consultation identified 13 sites including 10 in Zone C and 3 outside. Sites were identified in all Districts with the exception of Cheltenham Borough where no suitable sites were available. On balance, having regard to all of the issues raised and the level of additional waste

Number 90 Type IND Name Jennifer Potts Organisation not applicable/not provided

recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

17. Do you have any comments on Section 3?

I attended your Waste Core Strategy Meeting at the Royal British Legion Club in Hardwicke on Monday 9th November. I seriously took note of all the information displayed and asked a number of questions. I have your Waste Core Strategy questionnaire which I feel I cannot fill in correctly as the consultation does not cover which technology or method might be installed on any of the 13 possible sites for waste disposal. May I point out that I am opponent of a single Giant Incinerator on any of the 13 sites in particular Javelin Park which is on the edge of A.O.N.B and a beautiful unspoilt village. I believe the County Council rushed into purchasing Javelin Park just because of the PFI application not researching in it thoroughly enough. I have lived in Haresfield for 16 years and was never consulted about this in 2004. I believe there will be no need for a giant incinerator. People are becoming more and more aware of the 3 R's reduce, reuse and recycle, an incinerator would act as a disincentive to recycle. I believe the long term costs to the tax payer will be higher and would be a huge mistake. If the County Council are insistent on Incineration going, against their Conservative manifesto, may I suggest a small scale type used in Scandinavia for the proposed housing development at Hunts Grove and the business park providing electricity for them or, or at least Wingmoor Farm area in Tewkesbury which already has the toxic fly ash!! What about global warming! Please don't make the same mistake as other Countries have. It seems to me that the only safe disposal of rubbish is mechanical biological treatment that makes a compost-like product. It is the only technology that I would be in favour of at Javelin Park. For someone who loves the Gloucestershire country side and is a fanatical recycler even having my own wormery for food waste, it is very hard to believe that the whole of the counties rubbish could be incinerated on my doorstep!

17. Officer Response.

Comments noted. Dealing with each in turn. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of

Number 90 Type IND Name Jennifer Potts Organisation not applicable/not provided

projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 311 Type IND Name Kay Powell Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

It seems sensible to keep the waste operations in defined areas, rather than spread around the county.

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

Javelin Park has a suitable location next to the motorway. I think that Moreton Valence has too. A friend of mine uses some of the land at Wingmoor Farm as a gun range; if the gun club is evicted, where else would be suitable? I don't know the other sites well, but it seems stupid to even think of putting a large treatment plant just north of the Railway Triangle because of the access problems.

4. Officer Response.

Support for Javelin Park and Moreton Valence noted. In terms of the gun club, this site - Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the inclusion criteria for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental Ltd and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council

Number 311 Type IND Name Kay Powell Organisation not applicable/not provided

does not recommend that his site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations. In terms of Site 7, Land North of Railway Triangle, the site has not been taken forward into the Publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

6. Please give a reason for your answer to Question 5.

With any luck, the RSS will be changed. Let's not worry too much about what it might be; let's wait and see what is decided before making our decisions.

6. Officer Response.

Comment noted. The intention of Government to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I'm not sure/I don't know

8. Please give a reason for your answer to Question 7.

It wouldn't affect me, and I simply don't know whether or not it is necessary.

8. Officer Response.

Noted.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

Suitable Not Suitable Don't Know

Number 311 Type IND Name Kay Powell Organisation not applicable/not provided

1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

I don't know any of these sites.

10. Officer Response.

Noted.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I do not support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

It's best not to spread the waste around unnecessarily. Treat it all in one place.

12. Officer Response.

Support noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No.

13. Officer Response.

Noted.

Number 1836 Type BUS Name D Pratt Organisation Jackies Coaches

4. Please give a reason for your answers to Question 3.

I am very concerned regarding this matter as we run a coach company just across from the proposed plan. As it is at the moment we find the dust levels are very high coming across from the waste site. I have drivers and cleaners working outside and I don't think if this proposed development goes ahead it would not be very healthy for them. If there will be more vehicles accessing the site this also could be a problem as the lane used comes out onto the A38 near a fast bend which could be a hazard. This proposed site is to be developed on farm land which would desecrate the surrounding area.

4. Officer Response.

Noise, dust and lighting are matters that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any `sensitive receptors'. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site.

However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning conditions. With regard to pollution it should be noted that planning and pollution control regimes are separate but complimentary. Pollution control is concerned with preventing pollution whilst planning controls the development and use of land. Waste planning authorities are expected to work on the assumption that the relevant pollution control regime will be properly applied and enforced. PPS10, states that modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health. A full Transport Assessment will need to accompany any proposal for development. The TA should include a full assessment of the site access and routes to connect to the M5 at Junctions 12 and 13, and beyond to the wider principal road network. Contributions towards both maintenance and junction improvements along the transport routes to and from the site may be required. In particular improvements are likely to junction 12 to the M5 and on the more immediate principal road network such as the A38 and its junction with the B4008. The access junction from the A 38 to the site itself will likely require improvements due to its proximity to an existing junction on the western side of the A38 and an existing lay-by . It should be noted that the Highways Agency has programmed an improvement scheme for Junction 12 in 2010/11, but this does not preclude the requirement for the assessment of the impact of any development traffic upon the operation of the Junction.The companion guide to PPS10 states that waste development on greenfield land should not be ruled out. This site has come forward in the process as it is next to an existing brownfield waste site.

Number 211 Type PC Name Christine Prince Organisation Chalford Parish Council

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Good Access. Far away from main residential areas.

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works		X	
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

In suitable areas. Plenty of space and good access. Relatively near to residential areas. Sites liable to flood in Tewkesbury. Nastend Farm is too far away from residential area. Javellin Park, Haresfield - lorries should be compelled to use the motorway link to gain access rather than through already congested Stonehouse.

4. Officer Response.

Support for sites (Javelin Park, Moreton Valence) noted. In terms of flood risk at Easter Park, Ashchurch, the strategic flood risk assessment (SFRA) carried out in support of the site options consultation confirms that the site is not located within a flood zone. The strategic flood risk assessment did highlight the fact that a culvert runs underneath the site which was also raised by a number of respondents to the consultation. Notwithstanding the above, since the site options consultation was undertaken in October 2009 and following discussions with the landowner it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. For this reason, it has been decided that this site will not be taken forward into the Publication WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations. It would also need to address the issue of flood risk. With regard to Site 8, Nastend farm, the site has not been taken forward into the Publication WCS because although the County Council is the landowner, following discussions with the County Council's Waste Disposal Authority (WDA) it would appear that there is significant uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore, the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the Publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national

Number 211 Type PC Name Christine Prince Organisation Chalford Parish Council

policy and any other material considerations.With regard to Site 4, Javelin Park, the site has been taken forward into the Publication WCS because there is support from the landowners which greatly increases the prospects of delivery, the site is located close to Gloucester one of the county's main urban areas, the site enjoys good access to the strategic road network (SRN) is not at risk of flooding, has no other significant nearby environmental constraints and there are relatively few sensitive uses located nearby. Furthermore whilst the site is not currently in waste management use, it is previously developed (brownfield) land.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Disagree

6. Please give a reason for your answer to Question 5.

There needs to be small developments in rural areas in order to keep villages alive. Waste areas should be sited keeping this in mind.

6. Officer Response.

Comment noted. The Government's intention to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

To reduce transport of waste

8. Officer Response.

Support noted, however, on balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

In rural areas but not near main residential area. At the top of Cotswolds so waste can be drawn from a lot of Cotswold villages.

10. Officer Response.

Support noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet

Number 211 Type PC Name Christine Prince Organisation Chalford Parish Council

the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. Please also see response to Q8 in relation to sites outside of Zone C.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

See answer to question 7. Waste sites must be spread to include rural areas.

12. Officer Response.

Support noted. See previous response.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No

13. Officer Response.

Noted

14. Do you have any comments on the Executive Summary?

No

14. Officer Response.

noted

15. Do you have any comments on Section 1?

No

15. Officer Response.

noted

16. Do you have any comments on Section 2?

The use of incinerators at sites and installed widely.

16. Officer Response.

Comment noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.

17. Do you have any comments on Section 3?

Number 211 Type PC Name Christine Prince Organisation Chalford Parish Council

No

17. Officer Response.

Noted

18. Do you have any comments on Section 4?

This subject has been discussed/consulted on over several years. When is it going to happen? There has been little result or decisions made.

18. Officer Response.

Comment noted. The delivery and implementation element of the WCS is intended to ensure that the policies and proposals within the WCS fulfil their targets and objectives. Where policies and proposals are failing to deliver their targets and objectives they will be revised or replaced as appropriate. Progress will be measured through the AMR (Annual Monitoring Report).

19. Do you have any comments on the Sustainability Appraisal reports?

Not known

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

Not known.

20. Officer Response.

Noted.

Number 441 Type INTL Name Lisa Pritchard Organisation Waste Disposal Authority

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

The Waste Disposal Authority (WDA) agrees with the principle of focussing on Zone C for strategic waste sites. Gloucestershire County Council has two sites in it's ownership within this area but is aware that other sites may be needed for the treatment and transfer of C&I waste and that the WDA may require further facilities to deliver it's aim of diverting residual waste from landfill.

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X		
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre	X		
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester	X		
8. Nastend Farm, Stroudwater Business Park	X		
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West			

4. Please give a reason for your answers to Question 3.

The WDA is currently in a PFI procurement for the delivery of residual waste management facility (ies), which is both technology and site neutral. Javelin Park has now been identified as a site common to all proposed solutions brought forward as part of procurement process. The WDA supports the approach to include preferred strategic sites for residual waste management in the Waste Core Strategy where it will assist in delivering the Authority's Joint Municipal Waste Strategy Objectives. The WDA promotes the following potential sites which are considered suitable and available for waste uses. Southern part of Javelin Park: The WDA, following detailed site assessment has acquired the Javelin Park site which has now been offered as a reference site to bidders in the current Residual Waste PFI procurement. A number of the bidders have confirmed that they consider the site suitable for facilities capable of managing residual municipal waste arisings in Gloucestershire over the next 25 years in a more sustainable manner. Feasibility work carried out to date has confirmed the site's suitability for a strategic waste management solution. The site comprises previously developed land allocated for industrial uses, benefiting from suitable access to the major highway network and in reasonable proximity to the main areas of waste arisings. There are few sensitive receptors close to and around the site. Ownership of the site provides greater certainty that this site will come forward during the plan period. Furthermore the site is available and suitable for strategic waste infrastructure consistent with relevant national policy guidance, in particular Planning Policy Statement 10 and its Companion Guide. All other sites deemed suitable: although Javelin Park is identified a common site to all bidders in the Residual Waste PFI procurement, contingency sites must be available to deliver any residual waste solution proposed by the bidders. This may include core technologies including: Mechanical Biological Treatment, Mechanical Treatment, Energy from Waste (Incineration). Municipal Waste is only a small proportion of Gloucestershire's waste stream therefore the WPA is requested to allocate sites which can accommodate facilities which can treat

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other wastes such as commercial and industrial waste. The Waste Core Strategy should include criteria based policy which allows the consideration of non allocated sites which may come forward once the plan has been adopted. Such a policy can provide flexibility whilst ensuring that sites which have become available are subject to the same degree of appraisal and scrutiny as that applied to sites allocated in the adopted Waste Core Strategy and related development plan documents. The WDA would encourage the WPA to include sites that can provide flexibility for the treatment of municipal waste and small business waste and those that can cope with different waste uses (e.g. waste treatment, waste transfer). Consideration needs to be given to how preferred strategic sites and any local sites have the potential to form an integrated network of waste management facilities capable of managing all waste streams at the appropriate level of the waste hierarchy.

4. Officer Response.

Support for inclusion of strategic sites within the WCS noted. Comments relating to the use of Javelin Park noted. Support for other sites and the potential need for contingency noted. Comments relating to core technologies noted. The comments concerning other waste streams such as commercial and industrial waste are noted. The Council's approach to all waste streams including strategic site allocations will be clearly set out in the publication WCS. The need for criteria-based policy is noted. The intention is to include criteria-based policy within the publication WCS to allow for speculative proposals to be determined. The need for an appropriate 'network' of sites is noted. The Council's approach will be clearly set out in the publication WCS.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

6. Please give a reason for your answer to Question 5.

The principle of treating waste as close to it's source as possible is a good one and the positive effect this may have on the local residents thinking about the 3Rs (reduce, reuse, recycle) should not be underestimated. It is unclear at this stage what mechanisms would be used to facilitate the development of such facilities and how they would be funded. The WDA has a legal responsibility to dispose (manage) all municipal waste. The Residual Waste Project, currently in procurement by the WDA, is sizing the residual waste solution to accommodate changes in population over the life of the project (25 years). It seems prudent to plan for the eventuality that residual municipal waste from any proposed urban extensions will end up being handled by this project.

6. Officer Response.

Comments and support in principle noted. The integration of waste management facilities into the urban extensions would allow waste from these developments and the wider Gloucester and Cheltenham area to be treated close to source in line with national and regional policy. However, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

There is a need to provide the necessary infrastructure to support the development of residual waste treatment facilities. If bulking and transfer facilities are not provided there are several knock on effects; The cost of collection will escalate as more vehicles will be required to deliver the waste to sites in Zone C from the surrounding areas. more vehicle movements would be needed which would impact on the road network There will be a negative effect on local air quality as more vehicles travel around the County and More CO2 will be emitted into the environment than would be if transfer was provided. In addition to support the delivery of the Joint Municipal Waste Management Strategy sites will be required for other ancillary services such as Waste Collection Authority depots and transfer and bulking

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for recyclables, and organic wastes (green waste and food waste). Although the WDA forecasts waste tonnage per head to reduce year on year, if this is not the case, further sites (for new additional facilities) may be required to deal with any increase in waste volume. The WDA considers it essential that the WCS and related development plan documents includes sites and policies which allow communities to management waste in a sustainable manner.

8. Officer Response.

Comments noted. Whilst the Council's preferred strategy is to provide strategic waste management facilities within Zone C, there is likely to be a role for sites outside this area e.g. smaller scale provision or supporting infrastructure e.g. waste transfer. On balance having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the publication Waste Core Strategy (WCS). It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the Waste Core Strategy (WCS) national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney	X		
3. Land at Lydney Industrial Estate, Lydney	X		

10. Please give a reason for your answers to Question 9.

The sites identified appear to have suitable access and are of sufficient size to suit development for supporting infrastructure.

10. Officer Response.

Support noted.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

The WDA would encourage the WPA to include sites that can provide flexibility for the treatment of municipal waste and small business waste and those that can cope with different waste uses (e.g. waste treatment, waste transfer). Consideration needs to be given to how preferred strategic sites and any local sites have the potential to form an integrated network of waste management facilities capable of managing all waste streams at the appropriate level of the waste hierarchy.

12. Officer Response.

Support noted. Whilst the Council's preferred strategy is to provide strategic waste management facilities within Zone C, there is likely to be a role for sites outside this area e.g. smaller scale provision or supporting infrastructure e.g. waste transfer. On balance having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the publication Waste Core Strategy (WCS). It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the Waste Core Strategy (WCS) national policy and any other material considerations.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No

13. Officer Response.

Number 441 Type INTL Name Lisa Pritchard Organisation Waste Disposal Authority

Noted

14. Do you have any comments on the Executive Summary?

No

14. Officer Response.

Noted.

15. Do you have any comments on Section 1?

No

15. Officer Response.

Noted.

16. Do you have any comments on Section 2?

The Joint Municipal Waste Management Strategy is being delivered across the County with the first District Council making changes to collection systems in 2008/9. Following these changes Cotswold District Council achieved the following; Reduced its waste arisings by 9% compared to 2007/8, Recycled or composted 61% of its waste and Reduced the waste it landfilled by over 8,000 tonnes. During 2010 Gloucester City Council and Tewkesbury Borough Council are planning to change their collection services in a similar way with comparable benefits being delivered. The remaining District Councils are at different stages of delivery but are committed to delivering the Joint Municipal Waste Management Strategy (JMWMS) to meet our minimum target of 60% recycling by 2020. When discussing waste issues some people believe that there is no need to produce any waste at all and that the JMWMS should have a much higher recycling and composting target. Whilst the WDAs will not be limited by the 60% target we are also realistic in what can potentially be achieved. The exceptional performance of the Cotswolds in achieving the 2020 target in one step should not be a message that the 60% target will be easy. Gloucestershire has two large cities Cheltenham and Gloucester and in these urban areas it will be considerably more difficult to achieve a 60% recycling and composting rate. This is because of many factors; The two cities have more than 20,000 flats between them which do not readily lend themselves to collection system changes or high recycling rates, Urban populations have traditionally recycled and composted less waste so there is more inertia to overcome to get the population to buy into new systems and Over 30% of the Counties overall waste arises from these two urban areas and so the performance here will have a greater effect than in smaller populations. For these reasons we believe a 60% target is a challenging one and will need many people getting involved in practising the 3Rs to achieve it. Therefore the requirement for residual waste treatment facilities exists. The emerging Waste Core Strategy and sites development plan documents need to fully reflect the key planning objectives of Supplement to Planning Policy Statement 1 Planning and Climate Change as well as National/Regional renewable and low carbon energy strategies. Further consideration should be given to the consideration of out of county and regional solutions to waste management where it is assessed to offer a realistic and sustainable option.

16. Officer Response.

Comments concerning recycling in Gloucestershire noted. The Publication WCS will clearly set out the latest information concerning recycling rates and the proposed policy approach to be taken forward.

17. Do you have any comments on Section 3?

No

17. Officer Response.

Noted.

Number 47 Type IND Name David Purchase Organisation not applicable/not provided

17. Do you have any comments on Section 3?

In response to the Gloucestershire County Council's 'Potential Waste Sites in Gloucestershire Consultation' I would like to submit the following response. I cannot support this consultation as it does not give the respondent the opportunity to comment on the preferred waste technologies for the sites listed. Inappropriate methods of waste disposal such as Incineration could possibly be introduced on any of the 13 waste sites proposed in the document. If the respondent agreed to any of the sites being 'suitable for the treatment of residual household waste', the County's Environmental Department could then try to justify a heat to energy disposal plan by such a 'blind' response. All 13 sites may be suitable, within a waste dispersal policy that consists of green disposal methods such a MBT and Anaerobic Digestion. However, the consultation does not allow the respondent to make such comment, which is totally unacceptable. The County Council should firstly rule out incineration from its waste core strategy and then repeat the consultation, marrying up the waste sites to the technologies suitable for each site. Waste should be disposed of where it is produced and not transported across the County to a central waste site. There has also been reluctance for the County Council to consult with environmental groups when discussing waste disposal technologies. The Authority is however content in bringing in private waste companies to make the decision on Gloucestershire's behalf. If the County Council took a more flexible approach to this issue, environmentally it could become a Beacon Authority in the way the disposal of Gloucestershire future waste is organised. Difficult choices need to be made, to cut down our reliance on landfill, but a quick fix, easy option, one central site solution, will not, I feel, be the answer that is required for our future generations. What is required however are small sites dispersed around the County, disposing of waste at a local level; A far greater investment in a unified recycling service throughout the Districts to reach at least 80% recycling by 2020; Using MBT, In - vessel composting and anaerobic digestion to dispose of the 20% residual waste. Embracing new waste disposal technologies as they come on line and the County Council dismissing a necessity to be tied to a one site, one technology fits all policy for over 25 years. To conclude:- This Consultation cannot produce a sound assessment of where the most appropriate site or sites for the disposal of waste are. The Council needs to marry both site and technology and then consult again over this matter. Incineration should be removed from the Council's waste strategy and green waste disposal methods should be matched to the appropriate site. A one central site option is not acceptable as this will encourage waste to be brought in from outside of the County. It will tie the County Council to a ridged form of waste disposal over a long period, will discourage recycling and it will take away the opportunity to dispose of waste locally to where it is produced, in far more environmentally friendly ways.

17. Officer Response.

Comments noted. Dealing with each in turn. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS 10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. In terms of site location, the site options consultation included sites in all Gloucestershire Districts/Boroughs other than Cheltenham (where no suitable sites were found to be available). Ten of these sites were located inside Zone C and 3 outside. Views were invited on whether a combination of sites should be used. At this stage it has not been determined whether treatment of residual waste will take place on one large site or several smaller sites. The Council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the County. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility

Number 47 Type IND Name David Purchase Organisation not applicable/not provided

can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. The advantages and disadvantages would be investigated further during the procurement process. In terms of repeating the consultation, as set out above the Council is technology neutral. The consultation was carried out on the basis that the sites identified could accommodate a range of different technologies. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. On this basis it is not considered necessary to undertake further consultation. The WCS has been subjected to extensive consultation with a range of stakeholders in 2006, 2008 and 2009. With regard to the residual waste project, GCC has always met with environmental groups when an invite has been offered and has maintained an open door policy. Prior to the procurement, GCC met with several groups on a number of occasions to discuss the project and continues to do so. In addition, environmental groups, specifically, have been invited to be involved in the two consultations that GCC has held. The first, in 2007, was mainly focused on the Joint Municipal Waste Management Strategy (JMWMS), but part of the discussions at the focus groups was about residual waste and technologies. The second, more recently, was the consultation GCC ran to ask residents and local groups of Gloucestershire what they would consider to be the important issues when evaluating the solutions that may come forward. A questionnaire was sent to, amongst other people, environmental groups in Gloucestershire and several groups were invited to come to participate in a series of focus groups to discuss the issues in greater detail. GCC held 22 focus groups and three were specifically for members of environmental groups. The results of the consultation were incorporated into the evaluation framework that is being used to assess to solutions. With regard to recycling, the Council's recycling target of at least 60% by 2020 is 10% higher than the national target of 50% over the same period.

Number 217 Type CCLLR Name Martin Quaile Organisation County Councillor

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

It provides a geographical cental axis. I would prefer a site nearer to the River as the River would provide a further option for waste transport from the Forest of Dean say by barge thereby taking vehicles off the roads and giving an added use to what has become an underused river. Without visiting the sites at Q3 I cannot comment on suitability

2. Officer Response.

Support for Zone C noted. The two sites identified in the site options consultation at Hurst Farm, Lydney and Lydney Industrial Estate offer some potential for the movement of waste by water. The importance of finding alternatives to road transport is fully acknowledged although clearly it must be viable. PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by development criteria including those relating to transport. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

I do not know the sites well enough, if at all, to make comparisons and sensible comment. Maybe GCC should invite members to visit the sites and then provide their thoughts.

4. Officer Response.

Comment noted. The site options consultation paper identified 13 potential sites and provided a pro-forma of each site with a site description, maps and photographs. Further information was made available as part of the supporting evidence base.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

6. Please give a reason for your answer to Question 5.

Number 217 Type CCLLR Name Martin Quaile Organisation County Councillor

Assuming RSS happens then planning could well allow the opportunity to place the facility in the best location for all as opposed to having to consider "locked in" sites.

6. Officer Response.

Support noted. The WCS has a role to play in ensuring all new development is underpinned by appropriate waste management infrastructure (e.g. recycling facilities). However, there has been no interest from either waste operators or the developers leading the urban extensions in providing this type of facility as part of the development. Furthermore, the Government's intention to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

I am a believer in waste transfer stations in such a geographically large area as Gloucestershire and the idea for south Forest waste to go to Lydney, be sorted and then barged up river seems to me to be eminently sensible. Failing barging, then at least the A48 can be used as an alternative

8. Officer Response.

Comments noted. Support noted for waste transfer stations and the bulking of waste. Support for sites at Lydney noted, particularly those with the potential for water borne transport options. PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. Please also see response to Q2. Furthermore, the Publication WCS contains Core Policy WCS14 which covers sustainable transport.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney		X	
3. Land at Lydney Industrial Estate, Lydney	X		

10. Please give a reason for your answers to Question 9.

Access to the River and the A48

10. Officer Response.

Comments noted, including support for potential sustainable transport options.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

I think my earlier answers explain my thoughts and reasons

12. Officer Response.

Comment noted.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

Number 217 Type CCLLR Name Martin Quaile Organisation County Councillor

No

13. Officer Response.

Noted

14. Do you have any comments on the Executive Summary?

No

14. Officer Response.

noted

15. Do you have any comments on Section 1?

No

15. Officer Response.

noted

16. Do you have any comments on Section 2?

No

16. Officer Response.

noted

17. Do you have any comments on Section 3?

No

17. Officer Response.

Noted

18. Do you have any comments on Section 4?

No

18. Officer Response.

Noted

19. Do you have any comments on the Sustainability Appraisal reports?

No

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

No

20. Officer Response.

Noted.

Number 401 Type IND Name Bernard Quinn Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Zone C is near to the main centres of population, yet not in AONB or flood plains.

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X		
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre	X		
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester	X		
8. Nastend Farm, Stroudwater Business Park	X		
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West			

4. Please give a reason for your answers to Question 3.

Small local sites are better than one large one. Waste disposal is important, and even sites that have a smal environmental impact should be used.

4. Officer Response.

Comment noted. The site options consultation paper identifies 13 sites drawn from an initial long-list of 329 sites. Views are invited on whether a combination of different sites should be used. The Council is not committed to a one-site solution. The council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the county. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. The advantages and disadvantages would be investigated further during procurement process.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Agree

6. Please give a reason for your answer to Question 5.

Small local sites are most important.

Number 401 Type IND Name Bernard Quinn Organisation not applicable/not provided

6. Officer Response.

Support noted. However, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

Cirencester and Lydney are both population centres that need Waste Strategy support

8. Officer Response.

Support noted. The site options consultation identified two sites in the Forest of Dean at Lydney and also one site at Foss Cross near Cirencester in the Cotswolds. However, on balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period and the need to manage waste close to source in line with national policy, it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney	X		
3. Land at Lydney Industrial Estate, Lydney	X		

10. Please give a reason for your answers to Question 9.

See Q8

10. Officer Response.

See previous response.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

See Q8

12. Officer Response.

See previous response.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

Not aware of any other sites.

Number 401 Type IND Name Bernard Quinn Organisation not applicable/not provided

13. Officer Response.

Noted.

Number 244 Type AGEN Name Tim Quinton Organisation Natural England

20. Do you have any comments on the Habitat Regulations report?

Natural England's statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. This reply gives our advice on the requirements of Regulation 48 of the Conservation (Natural Habitats,&c.) Regulations 1994 (known as "the Habitats Regulations"). Natural England is aware that the full details of the sites are contained in the HRA Baseline report (Update 2), and are happy with the quality of data used in screening task A, and that the reasons for notification and sensitivities of each site within the plan area have been accurately recorded. However, in terms of the HRA Screening Report, particularly Task B, it is significant that the potential impacts do not relate to the specific technology to be employed on the sites. The issue of technology is only addressed in broad terms defining only small and large scale thermal and non-thermal treatment facilities. The potentially very different effects of various types and scales of non-thermal treatment facilities need to be considered. Combine this lack of specifics on technology with Natural England's reservations re; the buffer zones (as detailed on pages 4 and 5), and we have a real issue around, in particular, the Severn Estuary. Sites 1 to 10, though mostly beyond the buffer zone of the site itself, look to all be within the catchment of the river Severn, and upstream of the estuary. The Environment Agency needs to respond to you on this issue through the consultation process. The WCS contains 13 site options, most of which are within a 10km radius of at least one of 11 European and Internationally Protected Sites (SACs, SPAs and Ramsar) identified, so that they are likely to have an impact or an in combination impact irrespective of the technologies employed at the sites. Of the 34 possible effects considered from development of either technology option on each site (screening task D), only 7 were considered in the screening assessment to have no likely significant impact, and of the sites, only one had no likely significant impact irrespective of the technology used (Outside zone C Site 1 a: Foss Cross industrial estate, Calmsden, Cotswold district), Unfortunately, because Thermal Treatment Facilities are, according to task D, the far more likely to pollute, and the non-thermal treatments are undetermined, the likelihood of impacts on protected sites is both high, and insufficiently explored, Natural England therefore has to employ the precautionary principle and fall back on standing advice for all sites: Natural England's advice on the requirements of Regulation 48 of the Conservation (Natural Habitats, &c,) Regulations 1994 (known as "the Habitats Regulations") is as follows: Regulation 48 requires your authority, before deciding to give any consent to a project which is (a) likely to have a significant effect on a European site (either alone or in combination with other plans or projects), and (b) not directly connected with or necessary to the management of the site, to make an appropriate assessment of the implications for the site in view of its conservation objectives, In this case the WCS (as a strategic planning document at consultation stage) is not at this point directly connected with or necessary to the management of the sites, but it is Natural England's view that it is likely to have a significant effect on a European site, Before progressing the WCS to submission stage your authority must undertake an appropriate assessment of the implications of the proposals effects, in consultation with us, on the site's conservation objectives. Part I B of OOPM Circular 0612005' explains the procedure for the consideration of plans and projects likely to affect European and Ramsar sites, Please contact me to discuss how to proceed with the progression of the WCS. The advice given by Natural England in this letter is made for the purpose of the present consultation only, In accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England expects to be included as a consultee in relation to any additional matters to be determined by Gloucestershire that may arise as a result of, or are related to, the proposals in the WCS, Natural England retains its statutory discretion to modify its present advice or opinion in view of any and all such additional matters or any additional information related to this consultation that may come to our attention.

20. Officer Response.

Comments from Natural England are welcomed. It is noted that Natural England are happy with the quality of data used in screening task A, and that the reasons for notification and sensitivities of each site within the plan area have been accurately recorded. Also noted is the comment requiring further appropriate assessment. This more detailed work is currently underway using independent consultants in close liaison with Natural England and the Environment Agency and will be published alongside the publication WCS.

Number 278 Type BUS Name T Radway Organisation Tacr Consultancy

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

Easy access to major highway routes and lack of residential dwellings nearby or within prevailing wind canopy

4. Officer Response.

Support Noted

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Disagree

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

deal with waste near area of source

8. Officer Response.

Comments noted, but on balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney		X	

Number 278 Type BUS Name T Radway Organisation Tacr Consultancy

3. Land at Lydney Industrial Estate, Lydney	X		

10. Please give a reason for your answers to Question 9.

deal with waste near its source 3a has a chance of rail access

10. Officer Response.

Comment noted. Please see response to Q8.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

14. Do you have any comments on the Executive Summary?

There will ALWAYS be a residual waste to be dealt with no matter how much recycling is undertaken. Waste to energy is the only way forward to help deal with that residue. Landfill is becoming impossibly short due primarily to importation into Gloucestershire of waste from other Authorities. That importation MUST be stopped now !

14. Officer Response.

Comment noted. The need to shift away from landfill is acknowledged. This is reflected in the EC Landfill Directive (1999/31/EC) which imposes a tax on the amount of waste disposed of and also restrictions on the amount of waste and resultant fines. The site options consultation focuses on identifying sites suitable for residual waste treatment. This will help reduce the current reliance placed on landfill. Recovering energy from waste is preferable to disposal through landfill. This is reflected in the Waste Hierarchy.

Number 42 Type IND Name Ian Rank-Broadley Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
4. Javelin Park, Haresfield		X	
8. Nastend Farm, Stroudwater Business Park		X	

4. Please give a reason for your answers to Question 3.

I wish to register my objection to the proposed incinerator at Javelin Park for the following reasons: The release of significant amounts of toxic chemicals, including dioxins, which most experts accept can cause cancer and affect children's growth. Low-level exposure is known to interfere with the reproductive and immune systems. Incinerators represent a long term source of pollution, and the placement of one at javelin Park will adversely affect the populated areas of Gloucester and the surrounding district. The transport and burial of fly ash will also contribute to the release of dioxins into the environment. 2 Any new incinerator that is build under the P.F.I. will involve long contracts. The construction and operation of a plant is a huge capital outlay, which the company will wish to recoup over a long contract. It is not unreasonable to assume that the company will require large quantities of waste, and if this is not met, impose financial penalties. It is ludicrous that Gloucestershire waste management policy be dictated by private enterprise for so long, regardless of any change in the market in the future. 3 Any incinerator will reduce the incentive to re-cycle and reuse. 4 The demands of the incinerator and its' costs may well induce the contractor to import waste from other areas, which in turn will increase emissions from transporting vehicles. 5 The high visibility of the chimney will have a detrimental effect in the surrounding rural/agricultural landscape. 1 Stroudwater Business Park has clearly defined perimeters. Exceeding these will encroach upon the nearby agricultural land. Once lost it will never be regained. There has been a settlement at Nastend since the fifteenth century. Although only a hamlet, it has retained the best qualities of the English Village to the present day. My own residence at Green Farm, Nastend is one of the few remaining farmsteads with its original threshing barn dating from the 1730s. Any use of Nastend Farm for incineration or refuse disposal will undoubtedly affect the historic character of this area negatively. In conclusion, I reject incineration in any form in favour of small scale recycling I composting projects. Such projects will be more flexible to the needs of the community and less expensive than an incinerator built under Private Finance Initiative.

4. Officer Response.

Comments noted. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to

Number 42 Type IND Name Ian Rank-Broadley Organisation not applicable/not provided

incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill. Site 8, Nastend Farm, the WPA has carefully considered all the issues on this site. Since the site options consultation was undertaken in October 2009 and following discussions with the County Council as WDA, there is significant uncertainty over the prospect of delivering a strategic waste management facility on this site. For this reason, it has been decided that this site will not be taken forward into the Publication WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 48 Type IND Name Hazel Rank-Broadley Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
4. Javelin Park, Haresfield		X	
8. Nastend Farm, Stroudwater Business Park		X	

4. Please give a reason for your answers to Question 3.

For the following reasons I wish to object to the proposed new incinerator: The release of significant amounts of toxic chemicals, including dioxins, into the atmosphere which most experts accept can cause cancer and affect children's growth. Also low-level exposure is known to interfere with the reproductive and immune systems. Incinerators represent a long-term source of pollution, and the placement of one at Javelin Park will adversely affect the populated areas of Gloucester and the surrounding district. The transport and burial of fly ash will also contribute to the release of dioxins into the environment. Any new incinerator that is build under the P.F.I. will involve long contracts. The construction and operation of a plant is a huge capital outlay, which the company will wish to recoup over a long contract. It is ludicrous that Gloucestershire waste management policy be dictated by private enterprise for so long, regardless of any change in the market in the future. It will prohibit the consideration of any new technologies for the purpose which may be a more efficient and safe alternative for a considerable time. The demands of the incinerator and its' costs may well induce the contractor to import waste from other areas, which in turn will increase emissions from transporting vehicles. Any incinerator will reduce the incentive to re-cycle and reuse. I would consider one of the methods using more modern technologies employing enzymes, which are being introduced in Germany and the Nordic states, might be better for our environment. In addition I wish to object to the use of land at Nastend Farm for waste purposes. The access would in no way be efficient for the amount of traffic, and losing this land for agriculture does not seem appropriate use.

4. Officer Response.

Comments noted. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill. With regard to Site 8, Nastend Farm, the Waste Planning Authority has carefully considered all the issues on this site. Since the site options consultation was undertaken in October 2009 and following discussions with the County Council as Waste Disposal Authority, there is significant

Number 48 Type IND Name Hazel Rank-Broadley Organisation not applicable/not provided

uncertainty over the prospect of delivering a strategic waste management facility on this site. For this reason, it has been decided that this site will not be taken forward into the Publication WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 198 Type IND Name Hazel Rank-Broadley Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I'm not sure/I don't know

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
8. Nastend Farm, Stroudwater Business Park		X	

4. Please give a reason for your answers to Question 3.

Proximity to food manufacture at Dairy Crest. Lack of access for stream of lorries. Loss of farmland for food production. Proximity to number of listed dwellings.

4. Officer Response.

Comments noted. The proximity to the industrial area is considered to be an advantage. Waste uses are often compatible with industrial uses and in this case the area presents the opportunity for the use of heat and power generated by a waste recovery process. The site has been subjected to an initial highway assessment with no significant constraints to development identified. Although the site is greenfield, it is allocated for development in the Stroud Local Plan, the principle of development having already been accepted. Notwithstanding the above, the site has not been taken forward into the publication WCS because although the County Council is the landowner, following discussions with the County Council's Waste Disposal Authority (WDA) it would appear that there is significant uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore, the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 254 Type IND Name M J Rawlins Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I write to object to the use of all 13 of the sites listed for possible waste treatment in Gloucestershire on the grounds that: Any of these sites could be used for incineration, which I oppose. Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. I understand that incineration will be for at least 24 year, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. Incinerators act as a disincentive to reduce, reuse, recycle and in the long term the costs to the tax payer will be higher. Large incinerators in other areas of the County are already deemed to be a mistake. Other technologies such as mechanical biological treatment (including anaerobic digestion) that are less polluting are better for the environment and for the taxpayer.

17. Officer Response.

Comments noted. Dealing with each in turn. The Council is currently technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. Following the decision by Defra in October 2010 to withdraw Gloucestershire County Council's Private Finance Investment (PFI) credits (worth £92million), the council is currently carrying out a strategic review of the project. The outcome from the review will be considered by Cabinet in February 2011. Ultimately Gloucestershire County Council has to find an alternative to landfill. Doing nothing is not an option. The contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Research shows that PFI helps deliver projects on time and on budget more effectively than other types of procurement. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly (amortising cost over shorter period) and therefore being unaffordable or there would be a balancing payment on contract expiry. It should not be assumed that economies of scale mean an inflexible solution. GCC recognises that regardless of the type of solution proposed, it is important that the solution must be able to cope with changes in waste volumes and composition, as it is inevitable such changes will happen. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability or a reduced cost to the authority. With regard to incineration acting as a disincentive to recycling, GCC will be procuring a solution that aligns with its recycling and composting objectives. Tonnages are based on achieving 60% recycling capacity and are reviewed regularly using the most up to date figures. 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not necessarily accurate to assume that incineration undermines recycling.

Number 427 Type IND Name Diana Ray Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Means moving waste from Cotswolds and Forest of Dean and discourages smaller scale solutions nearer to the source of the waste that see "waste" as a resource.

2. Officer Response.

Comment noted. Zone C focuses on Gloucester and Cheltenham which is where most of Gloucester's waste arises. This approach will help to minimise the movement of waste by treating it close to source and is consistent with national and regional policy.The site options consultation paper identifies two sites outside Zone C within the Forest of Dean and one in Cotswold District presenting the opportunity for relatively small scale treatment of waste or transfer to support the facilities within Zone C. In terms of movement of waste, the use of transfer facilities to 'bulk-up' waste from smaller collection vehicles into larger vehicles, will help to reduce the number of separate trip movements that need to be made for the waste to reach the treatment/recovery facility/facilities. The Council's position in relation to sites outside Zone C will be clearly set out in the Publication WCS.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Disagree

Number 448 Type PC Name Diana Ray Organisation Cold Aston Parish Council

17. Do you have any comments on Section 3?

We consider this to be a very important matter and find it unhelpful that the consultation has tried to de-link the sites selection issues from the choice of technologies and also the strategy itself. The lack of openness about the technologies being emphasised by private companies interested in bidding has made it very difficult for parish councils as elected bodies for their communities to be able to weight up what is really on the table and relate that to the best strategy for their area. Access to data and information was also not easy- several websites and very long documents have had to be accessed (or attempted) to make a proper response. We stand by our vision in our previous submission. What Gloucestershire councils (at district and county level) must plan for is Strategies that encourage less "waste" to be generated in the first place - this means investing in staff and local teams to help people reduce. The GCC own data show that pilot projects are successful but for the mass of the population without such help homes are producing more waste albeit that there is more recycling, and that in our area, the Cotswolds, the population are not sending things to be re-used that could be and that waste of food is high. Technologies that are flexible to allow for changes in volume and type of waste and not financially penalised if waste streams to decrease We would like to see provision for anaerobic digesters and MBT approaches. These could create small scale local processing facilities, be flexible and create employment. If heat of compost are produces they could be used locally (eg Moreton new hospital, schools and small clusters of home in our local settlements). Establishing and committing to enough local facilities and capacity for our district to be able to support and encourage local processing not all along the Zone C- the rising cost of transport and the associated pollution and harm from lorry journeys could be less if facilities in our district are developed. Seeing "waste" as retrievable materials that can be salvaged and thus encouraging separation and understanding of the potential uses of these materials The whole basis for the technologies in the overall strategy should demonstrate joined up thinking based on this philosophy. The shift to an incinerator as the back up to cope with the waste that currently ends in land fill seems to be coming in in a stealth manner. It is hard to see why and how this technology was used as the example in the PFI business case when the reports and the strategy itself in the preceding years describe the need for investment in the heart of the strategy of waste reduction. This requires investment in human resources, staff and community based educational projects not an incinerator. Yet the reality is the support to composting initiatives such as that led by Gloucestershire Wildlife Trust were not extended and the expertise and rapport with communities has been lost. 3. The heavy emphasis on the techno-fix and proposed massive allocation of resources to this in the strategy and minimal commitment to human resources to try and reduce the waste at source makes us feel the strategy is not really being followed through. All we are presented with is a waste handling plan; and the emphasis seems to be "waste" rather than reprocessing into useful useable materials. 4. Regarding sites- we definitely want to see Fosse Cross retained and developed as a recycling facility- however we also want to see it develop re-using potential. So much stuff that still has a life gets crushed and despite years of asking, the Councils (County and District) fail to require this from the private contractors. It could be a good position for MBT and anaerobic digesters though no housing is near for the heat- facilities for anaerobic digesters near Cirencester, Northleach, Bourton, Stow and Moreton that could let the heat be utilised would be beneficial. Micro sites We want to see more support for local composting initiatives such as Lower Slaughter and help given to enable other local village sites to operate like this. 5. None of the proposed sites in the consultation are acceptable for incineration or receiving fly ash from incinerators (from within or outside the county). The cost to taxpayers of sustaining an incinerator and being tied in to a contract over decades predicated on providing waste is not justifiable or good use of public money. 6. We do not agree with proposals for incineration on grounds of it being out of line with a waste reduction strategy, harming to communities down wind, leaves us all with a residue of fly ash, and destroys materials that could be retrieved or reprocessed in future. The cost projections are very high and lock us in to providing waste to burn for decades to come.

17. Officer Response.

Comments noted. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account

Number 448 Type PC Name Diana Ray Organisation Cold Aston Parish Council

for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 403 Type IND Name Simon Read Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Whilst I support the need to focus on finding strategic waste sites, as a resident of Netheridge Close I strongly oppose any future expansion to the Netheridge Treatment Works. Our area has recently undergone a great deal of change - the South West bypass, the setting up of a prestigous Barn Owl and Birds of Prey centre, introduction of a Car Boot Sale, etc. Why can we not be left alone for a change? We have a nearby conservation area being enhanced by the Barn Owl Centre management team, and yet we have to be considered for yet more "dumping" of waste. During rainy periods, the Netheridge Treatment handles high volumes of waste transported by road, This can often be 24 hours and over weekends, giving local Netheridge residents little or no respite. I note the assertion in your paper that "the site (Netheridge Treatment works) is not particularly close to residencies". Do you not know of us residents living in Netheridge Close? Access to Netheridge Close is via the site access off the A430. Do we have to consider competing with an increase in traffic volumes further than those proposed when the South West bypass we built? Will we residnance receive ample compensation if Netheridge is chosen? Come down and visit our Close to see just how close it is to the Treatment works (approx 300 metres!). Please, please, please, consider somewhere further away from conservation and residential areas, and give us long-suffering residents a break! Yours hoping, Simon Read

2. Officer Response.

Comments noted. Dealing with each in turn. 'Dumping' Waste - It is important to note that the proposal does not relate to the 'dumping' or landfilling of waste, rather the consultation focuses on identifying sites for treating waste. This will help to divert waste from landfill. Traffic Impact - PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by development criteria including those relating to transport and highways. Notwithstanding the above, since the site options consultation was undertaken in October 2009 and following discussions with the landowner it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on the Netheridge site. For this reason, it has been decided that the site will not be taken forward into the Publication WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS national policy and any other material considerations.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works		X	
10. The Park, Wingmoor Farm West			X

Number 403 Type IND Name Simon Read Organisation not applicable/not provided

4. Please give a reason for your answers to Question 3.

9. - see my reasons above 7. - Gloucester City is working hard to improve it image and having a waste site so close to the city centre, and on land that could be put to residential or industrial use, is an oversight in my opinion.

4. Officer Response.

Comment noted. See previous response in respect of Site 9. In relation to Site 7, Land North of Railway Triangle, since the site options consultation was undertaken in October 2009, the Waste Planning Authority has carefully considered all the issues related to this site. Whilst it is fully recognised that it does currently serve a useful function as a site primarily handling construction and demolition waste, it will not be taken forward as a strategic site allocation due to highways and access issues. The site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

6. Please give a reason for your answer to Question 5.

Some expansion is necessary, but I have not had the time to assimilate all the information at this time.

6. Officer Response.

Comment noted. Significantly, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

More important to find the right site in the right area, than simply focussing on either existing sites or land clusters within a particular boundary.

Number 403 Type IND Name Simon Read Organisation not applicable/not provided

8. Officer Response.

Comment noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

11. Do you support the approach of using a combination of sites within and outside Zone C?

I'm not sure/I don't know

14. Do you have any comments on the Executive Summary?

No

14. Officer Response.

Noted.

Number 26 Type IND Name C Reeves Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
7. Land north of Railway Triangle, Gloucester		X	

4. Please give a reason for your answers to Question 3.

The land north of the Railway Triangle is completely unsuitable as a site for treatment of municipal solid waste (MSW), Commercial and Industrial (C&I) waste and also for supporting a waste transfer facility eg a Waste Incinerator for the following reasons; 1) Road transport access to the site is restrictive and difficult 2) Increased traffic noise and disturbance 3) Close proximity to residential areas and amenities 4) Close proximity to the Great Western hospital and school 5) Elevated position on the site on the Blinkhorns Bridge Lane side 6) Flood Risk to properties in Blinkhorns Bridge Lanel Armscroft Gardens 7) Environment and Health and Safety 1) Road transport access to the site The road access to the site is limited and difficult ie via Horton Road and Myers Road the only access to the site is along a single lane service road which Inadequate for the existing operation and therefore would be unable to safely support increased traffic. 2) Increased traffic, ie heavy traffic to and from the site. The current operation causes noise and disturbance to the surrounding area with the sound of heavy mechanical vehicles on the site whilst loading and unloading. The proposal to increase the volume of waste steams and material on the site will increase the frequency and level of noise disturbance during and outside operating hours. 3 and 4) Close proximity to residential areas, park, hospital and school The current operation has a detrimental effect on the living conditions of residents in the Armscroft and Swallow Park estates by reason of pollution, dust, noise and disturbance. The proposal to handle MSW and C&I waste will increase the detrimental effect on the living conditions by the effect of unpleasant smells of decomposing food and garden waste. Further, the proposal to install a waste incinerator on the site with the risk of emissions such as fly ash would present a serious and immediate threat to human health. Whilst exposure to dust pollution may not be considered by Inspectors to have long term effects, exposure to hazardous waste substances and emissions is harmful to human health and potentially life threatening. 5) Elevated position on the Blinkhorns Bridge Lane/Armscroft Gardens side Dust and fumes from the site will always be spread by the prevailing south and westerly winds and affect Armscroft Park, Swallow Park and the Armscroft Estate. The elevated position of the site and its close proximity to a large residential area and amenities, ie Armscroft Park, St, Peter's Infants and Junior School and the hospital make it completely unsuitable for handling the type of waste and operation proposed. Unlike Sandhurst where the fall out from the explosion fell mainly over farm land and open countryside, emissions from this site would fall over residential areas and amenities detailed above. 6) Flood risk to properties in Blinkhorns Bridge Lane and Armscroft Gardens I am astounded that there is no reference in the fact sheet that there is a flood risk to the area adjoining the site. The SFRA may indicate that the risk of flooding is low for the site, but does not include the impact of the development of the site on properties in the adjoining area. In 2007 properties in Armscroft Gardens and Blinkhorns Bridge Lane were flooded, some on two occasions, so developing a site which adjoins this area will further increase the risk of flooding to properties. We are constantly told that since 2007 lessons with regard to the future development will be learnt and that all the Agencies will work closely together in future. Currently the Environment Agency is developing a hydraulic model for Wotton Brook which is due to be completed in February 2010. Have the plans to develop the site for the waste operation and potential Waste Incinerator been factored into the hydraulic model? 7) Environment and Health and Safety I just hope that the County Council does base its decision on environmental grounds rather than which site will be the most profitable. The environment is our living conditions, the air we breathe and I feel that the County Council has a duty of care to protect our most essential resource for residents in the immediate vicinity of this site and in Gloucester and ensure we can breathe clean air.

4. Officer Response.

Comments noted. The site has not been taken forward into the publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly

Number 26 Type IND Name C Reeves Organisation not applicable/not provided

unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

17. Do you have any comments on Section 3?

Finally, I attended one of your 'drop in' sessions and received your questionnaire. I decided not to complete the questionnaire but to make my comments in a letter because I felt that I could only comment with authority on the suitability of the site in my area. Also, I do not feel it is appropriate for all the sites to be listed in some simplistic format with boxes to be ticked for suitable/not suitable and to be aggregated like some sort of competition. I feel that the suitability or not of each site should be considered individually on its own merits or not as the case may be. Please would you take my comments into account when considering the suitability of this site as one of the potential waste sites in Gloucestershire

17. Officer Response.

Comment noted. The consultation was supported by a questionnaire designed to elicit the most useful set of responses possible including some quantitative data. The intention was not however to treat sites in competition with each other rather it was to identify the salient issues in respect of each site.

Number 202 Type PC Name Cathy Reid Organisation Stoke Orchard Parish Council

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

The combination approach deals with waste at source in areas outside zone C

2. Officer Response.

It is essential that the WCS provides a clear strategy setting out what will be built and where. This will provide certainty and confidence to the development industry and help bring proposals forward. The Council's preferred strategy is to focus the location of new strategic waste management facilities on the area defined as Zone C. This approach is considered to be consistent with national policy (PPS10) and the Regional Waste Strategy. Although the preferred focus for strategic waste management is Zone C, a number of other sites were identified outside this zone in the Forest of Dean and Cotswold District in order to provide suitable flexibility and support for the Zone C sites. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch			
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre	X		
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester	X		
8. Nastend Farm, Stroudwater Business Park	X		
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West			

4. Please give a reason for your answers to Question 3.

1) The Wingmoor Farm East Sites are not suitable because of proxmity to a residential area. Also the highway access, transport capacity and highway infrastructure as a whole is inadequate. 2) Area A is agricutural land set in the greenbelt and therefore is a proposed site extension. Area A has been the subject of pre-epmtive fly rubble tipping to create a hard standing triangle adjacent to current waste use activity. This should not set a precedent for a change of use from agricutural activity in the greenbelt.

4. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies

Number 202 Type PC Name Cathy Reid Organisation Stoke Orchard Parish Council

should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. With specific regard to transport and highways, PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. For the Wingmoor Farm sites the assessment identified a likely net increase in traffic and the need for potential capacity improvements in certain locations near the sites. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. With regards to the use of Green Belt land, whilst it is acknowledged that the Green Belt should generally be protected, PPS10, emphasises that local authorities should 'recognise the particular locational needs of some types of waste management facilities when defining detailed green belt boundaries and, in determining planning applications'. In line with PPS10 companion guidance, should any sites within the Green Belt be specifically allocated within the WCS, it will need to be clearly indicated that they are for waste management purposes only. In relation to the three Wingmoor Farm East sites, the Publication WCS identifies part of Area C as a strategic site allocation under Core Policy WCS4. This site has been taken forward because it forms part of an existing waste management facility with support from the landowner/waste operator, which greatly increases the prospect of delivery. The site is also close to Cheltenham one of the county's two main urban areas. Furthermore the site is not at risk from flooding and there are relatively few sensitive uses located nearby. The importance of traffic issues in this area is recognised and any development would need to be supported by a Transport Assessment (TA) as appropriate. Area A is closest to a number of sensitive receptors and Following discussions with the waste operator it is evident that Area B is likely to be needed for other waste uses associated with the existing landfill operation and subsequent site restoration. For these reasons and having regard to the level of additional waste recovery capacity needed over the plan period, Areas A and B will not be taken forward into the Publication WCS. It should be noted that by not taking either Area forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations. It is assumed, from the description within the applicant's response under point 2, that they are actually referring to Area A of Wingmoor Farm West not Wingmoor East, therefore the remainder of this response is in relation to Area A of Wingmoor Farm West. Notwithstanding the above, it has been decided that on balance taking into account the fact that Area A is unallocated greenfield land within the Green Belt, has some sensitive receptors nearby to the south and that there has been no significant interest from the waste industry for strategic waste recovery raising question marks over the deliverability of a strategic waste management operation on this site, Area A will not be taken forward into the Publication WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Disagree

6. Please give a reason for your answer to Question 5.

Stoke Orchard Parish Council feel unable to comment until the Regional Spatial Strategy is determined.

6. Officer Response.

Comment noted. The Government's intention to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the

Number 202 Type PC Name Cathy Reid Organisation Stoke Orchard Parish Council

evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

Waste should be dealt with at source rather than centrally only.

8. Officer Response.

Support noted. Please see response to Q2.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney	X		
3. Land at Lydney Industrial Estate, Lydney	X		

10. Please give a reason for your answers to Question 9.

These sites deal with wastes arising at source.

10. Officer Response.

Comment noted.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

Wastes arising should always be treated at sites close to the source of waste.

12. Officer Response.

Support noted.

14. Do you have any comments on the Executive Summary?

The executive summary identifies strong advice from G.O.S.W. This government body based regionally, may not exist as from 2010. In view of this possibility, Gloucestershire County Council should not be constrained from seeking the best local strategy for Gloucestershire.

14. Officer Response.

Comment noted. Although the Government has announced its intention to abolish the RSS, the evidence that informed the preparation of the RSS may still be considered a material consideration. Furthermore, local authorities are expected to continue to progress their own development plan documents including waste plans, with enough land being provided for waste management facilities to support the sustainable management of waste.

15. Do you have any comments on Section 1?

Number 202 Type PC Name Cathy Reid Organisation Stoke Orchard Parish Council

1.11 'including specific sites where these are central to the delivery of the overall strategy' This should not be taken to mean excluding other less central sites closer to waste arising.

15. Officer Response.

Comment noted. The term 'central' in this context refers to being vital or essential to the delivery of the strategy. It does not relate to the location of sites.

16. Do you have any comments on Section 2?

We applaud the influences of local policy and the previous consultations, which form and inform local policy. We strongly disagree with regional policy which is still in draft form and at odds with local policy.

16. Officer Response.

Comment noted. Please see response to Q14.

17. Do you have any comments on Section 3?

Locational Strategy 3.27 We do not sgree with a focus primarily on the area defined as zone C.

17. Officer Response.

Comment noted. Please see response to Q2.

18. Do you have any comments on Section 4?

Because delivery/implementation is set out and defined locally in this document, is sets a realistic prognosis. This section also provides flexibility for delivering locally without regional intervention. The RSS allocations in Appendix 1 are proposals only.

18. Officer Response.

Support noted. Please see response to Q14.

19. Do you have any comments on the Sustainability Appraisal reports?

Conclusions 4.5 This form of words for implementation refers to 'erosion of settlements'. Fundamentally the strategic focus on zone c, reflects the potential for further erosion of these settlements already disadvantaged negatively.

19. Officer Response.

Comment noted. It is not accepted that that the proposed focus on Zone C allows for the potential erosion of these settlements. Zone C is where most of Gloucestershire's waste is produced, and there are suitable sites available in this Zone to manage this waste and move it away from landfill. The delineation of Zone C and the focus of provision at the two main urban areas of Gloucester and Cheltenham is consistent with regional waste policy. Please also see response to Q2.

20. Do you have any comments on the Habitat Regulations report?

It is a depressing feature of this document that by and large, natural habitats are well defined and protected in Gloucestershire. This is stark contrast to the erosion of man settlements and natural unprotected habitat both on and off the existing waste site options. There is an imbalance between the two considerations.

20. Officer Response.

Comment noted. Strong environmental protection leading to a cleaner environment is clearly beneficial both for people and other animal and plant species. The habitats regulations assessment seeks to protect sites which are of exceptional importance in respect of rare, endangered or vulnerable habitats and species within the member states of the European Union. There has to be a differentiation between areas that we seek to give very high protection because of their natural beauty or vulnerability and e.g. urban areas / less 'special' natural areas. This system of designations, of prioritising protection, is fundamental to the planning system. If all areas were protected equally, there would either be no development possible anywhere or, conversely the most beautiful natural habitats would be 'up for grabs' and thus become degraded.

Number 292 Type WOP Name Jeff Rhodes Organisation Biffa Waste Services

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

PPS10 advises that waste should be disposed of in one of the nearest installations. As such, any strategic facility should be located close to where the waste would be generated i.e. the greater populated areas within Zone C

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

Javelin Park was one of 6 sites identified in the adopted Waste Local Plan (2004) and one of only 2 of them to be deemed suitable for all types of waste management facility. The site is located on previously developed land and is not located in the Green Belt. It is located close to the Strategic Highway Network and is one of only 2 of the 10 identified sites that would most likely result in a decrease in traffic generation. There are no issues in respect of flood risk, ecology or biodiversity. It is one of the larger sites and so would be able to accommodate a one-site solution and could cater for C&I waste or additional MSW (should recycling targets not be met, or arisings exceed expectations).

4. Officer Response.

Support for Javelin Park noted.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Disagree

6. Please give a reason for your answer to Question 5.

First and foremost, strategic waste facilities are needed to serve the existing, established populated areas. They should not be dependent on potential urban expansions which will need to be identified, consented, built and permitted before waste is created. Furthermore it is more sustainable to have a one-site waste management solution instead of a number of smaller facilities to serve current and then proposed development. Javelin park would have the capacity to provide a facility to cope with existing and new arisings as and when they occur

Number 292 Type WOP Name Jeff Rhodes Organisation Biffa Waste Services

6. Officer Response.

Comment noted. The provision of strategic waste facilities is not dependent on the urban extensions and the waste created therein, but they do provide the potential to incorporate one or more facilities as an integral part of the design and layout of the development. In terms of a one site solution versus a multiple site solution, the Council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. Notwithstanding this, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a waste treatment facility or facilities as part of those proposals. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I do not support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

Sites outside Zone C should only be considered for waste treatment facilities in the unlikely event of all 10 sites within Zone C failing to be brought forward.

8. Officer Response.

Comments noted. It is essential that the WCS provides a clear strategy setting out what will be built and where. This will provide certainty and confidence to the development industry and help bring proposals forward. The Council's preferred strategy is to focus the location of new strategic waste management facilities on the area defined as Zone C. This approach is considered to be consistent with national policy (PPS10) and the Regional Waste Strategy. Although the preferred focus for strategic waste management is Zone C, a number of other sites were identified outside this zone in the Forest of Dean and Cotswold District in order to provide suitable flexibility and support for the Zone C sites. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester		X	
2. Hurst Farm, Lydney		X	
3. Land at Lydney Industrial Estate, Lydney		X	

10. Please give a reason for your answers to Question 9.

Treatment should be at a strategic waste management facility, located in locations where the majority of arisings will be i.e. Zone C. However, these sites could be suitable for waste transfer.

10. Officer Response.

Comment noted. Please see response to Q8.

Number 292 Type WOP Name Jeff Rhodes Organisation Biffa Waste Services

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

Sites outside Zone C should only be suitable for small scale transfer, where waste & recyclate are bulked up for processing at strategic facilities.

12. Officer Response.

Comment noted. Please see response to Q8.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

no

13. Officer Response.

Noted

14. Do you have any comments on the Executive Summary?

no

14. Officer Response.

noted

15. Do you have any comments on Section 1?

no

15. Officer Response.

noted

16. Do you have any comments on Section 2?

no

16. Officer Response.

noted

17. Do you have any comments on Section 3?

Para 3.8. Would disagree with the RSS's statement that a maximum facility of 200,000tpa would be needed. It is wrong to set maximum targets or capacities for waste treatment, as all waste treatment, even above capacity targets, reduces waste to landfill. It implies that if the 200,000tpa capacity was met before the end of the plan period, it would be acceptable for any additional waste to go to landfill.

17. Officer Response.

Comment noted. The figure of 200,000 tonnes per annum taken from Policy W1 of the RSS (Proposed Changes) is an 'indicative allocation' only. It is not a maximum target. The RSS will potentially be abolished, importantly however, the evidence that informed the preparation of the RSS may still be considered a material consideration.

18. Do you have any comments on Section 4?

no

18. Officer Response.

Noted

Number 292 Type WOP Name Jeff Rhodes Organisation Biffa Waste Services

19. Do you have any comments on the Sustainability Appraisal reports?

no

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

no

20. Officer Response.

Noted.

Number 373 Type IND Name Paul Rhodes Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
3. Easter Park, Ashchurch		X	

4. Please give a reason for your answers to Question 3.

I have just been told about this proposal and I am very concerned about it. I live on Saxon Park (The old Dowty site) in Northway and I feel the area already suffers enough with existing problems. We are very close to the train line, we have suffered chemical leaks from the PCB manufacturer on Alexandra Way, The Wincanton site looks derelict, the Youth Club is boarded up, the front of the Saxon Park estate was flooded in 2007. I think that is enough for now. Yes of course I don't want this facility 'in my back yard'. House prices around here will never be the best so please reconsider this proposal.

4. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. Notwithstanding the above, the Easter Park site has not been taken forward into the Publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 263 Type IND Name Peter Richmond Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as Zone C

2. Please give a reason for your answer to Question 1.

The area is already overloaded with waste sites.

2. Officer Response.

Comment noted. The designation of Zone C is consistent with national and regional policy, allowing for most of Gloucestershire's waste (arising in Gloucester and Cheltenham) to be managed close to source. The use of existing waste management facilities is consistent with national policy however it is acknowledged that regard must be had to the cumulative effect of previous waste disposal facilities on the care and well being of the local community including any significant adverse impacts on environmental quality, social cohesion and inclusion or economic potential. (PPS10).

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

There is a lack of infrastructure for areas 1, 2, & 10. The access road for the goes through a housing estate!

4. Officer Response.

Comment noted. It is unclear what is meant by 'infrastructure' in this comment. It is assumed that this refers to transport infrastructure. It is unclear where the housing estate referred to is located. In regard to transport, all of the 13 sites identified in the site options consultation paper, including the Wingmoor sites, were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. In the case of the Wingmoor Farm sites, the potential net increase in traffic is acknowledged and it is noted that improvements in certain locations e.g. junction improvements, may be required. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Disagree

6. Please give a reason for your answer to Question 5.

There is little enough suitable land for houses so where would the waste treatment facilities go?

Number 263 Type IND Name Peter Richmond Organisation not applicable/not provided

6. Officer Response.

Comment noted. The Government's intention to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

Zone C is heavily congested with traffic and has too many large centres of population.

8. Officer Response.

Support noted. Clearly the provision of new waste management facilities in urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source and the urban areas of Gloucester and Cheltenham are where most of Gloucestershire's waste is generated. This approach is consistent with national policy in PPS10, which emphasises that planning strategies should 'provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities'. It is also consistent with regional policy. It is also pertinent to note that the companion guide to PPS10 states that, 'with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development'. In terms of traffic, PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by a further highway assessment with any necessary mitigation (e.g. junction improvements) clearly identified as site-specific requirements. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

Insufficient information.

10. Officer Response.

Comment noted. The site options consultation included a detailed schedule of each site including site size, location, existing /proposed use, landscape as well as a plan and description of relevant highway, biodiversity and flood risk constraints. Further information was also made available in the supporting evidence base. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include

Number 263 Type IND Name Peter Richmond Organisation not applicable/not provided

any strategic site allocations outside Zone C. These sites will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the sites forward as allocations at this stage does not mean that the sites are unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I do not support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

There is an over reliance on waste treatment sites within Zone C. They are too close to centres of population.

12. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No

13. Officer Response.

Noted

14. Do you have any comments on the Executive Summary?

Written for councillors and not for members of the public!

14. Officer Response.

Comment noted. The consultation document has been drafted with plain English in mind and made as easy to read as possible. However it was difficult to avoid the use of jargon, abbreviations and acronyms altogether and waste is a technical subject. The Publication WCS will be worded as simply as possible with a broad audience in mind.

15. Do you have any comments on Section 1?

Too much jargon...

15. Officer Response.

Please see response to Q13.

16. Do you have any comments on Section 2?

Too much planning speak and a lack of plain English.

16. Officer Response.

Number 263 Type IND Name Peter Richmond Organisation not applicable/not provided

Please see response to Q13.

17. Do you have any comments on Section 3?

The range of sites is very limited - it is all about Wingmoor Farm and not much else?

17. Officer Response.

Comment noted. 329 sites were initially identified on a 'long-list' of sites and these were reduced down to 13 sites based on a number of factors including site size, location, flood risk, highways and availability. The re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community. The Wingmoor Farm sites met all of the criteria for inclusion in the site options consultation paper. With the exception of Cheltenham, all Districts/Boroughs include at least one site.

18. Do you have any comments on Section 4?

No alternatives considerered... No Plan B or C? e.g. compulsory purchase

18. Officer Response.

Comment noted. Paragraphs 4.31 -4.34 refer to the issue of contingency i.e. what if the site or sites do not come forward as expected? This is expanded in the draft delivery and implementation framework attached at Appendix 4 and will be worked up in more detail in the publication WCS. The framework will include specific courses of action that will be taken in the event of policies and proposals not coming forward as expected. Whilst compulsory purchase is a potential course of action to overcome the problem of site availability, it is a complex and costly process. As such it was considered more appropriate to identify sites that have a willing landowner in the first instance. As there were 13 available sites (taking into account other constraints -flood risk, highways etc.) it was not necessary to consider other alternative sites that could come forward through the use of the Council's powers of compulsory purchase.

19. Do you have any comments on the Sustainability Appraisal reports?

Define what you mean about sustainability?

19. Officer Response.

There are numerous definitions of sustainability. Broadly, Sustainability means promoting development that meets the needs of the present without compromising the ability of future generations to meet their own needs. Sustainability Appraisal (SA) considers the potential social, economic and environmental impacts of a particular plan, programme or development. It is a key part of preparing Development Plan Documents (DPDs) such as the WCS.

20. Do you have any comments on the Habitat Regulations report?

Not provided in the 74 page document...

20. Officer Response.

Comment noted. The HRA screening report was a separate document and was available as part of the overall consultation package on the Council's website, at all District Council Offices, local libraries and on request. It was not possible to include anything other than a brief summary within the main consultation document as this would have made the document too long.

Number 297 Type IND Name Lynn Richmond Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

There is too much waste processing in this area already

2. Officer Response.

Comment noted. The designation of Zone C is consistent with national and regional policy and will allow for most of Gloucestershire's waste (arising in Gloucester and Cheltenham) to be managed close to source. The re-use/intensification of existing waste management facilities is consistent with national policy however it is acknowledged that regard must be had to the cumulative effect of previous waste disposal facilities on the care and well being of the local community including any significant adverse impacts on environmental quality, social cohesion and inclusion or economic potential. (PPS10).

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

There is enough waste processing in this area now

4. Officer Response.

Comment noted. Please see response to Q2.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

6. Please give a reason for your answer to Question 5.

Not enough known

6. Officer Response.

Comment noted.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

Number 297 Type IND Name Lynn Richmond Organisation not applicable/not provided

Zone C already has a large number of sites that are processing waste from all over the country!

8. Officer Response.

Comment noted. A certain amount of waste is currently transported to Gloucestershire sites from other counties, but Gloucestershire also exports a percentage of its waste 'out of county'. It depends on the waste stream and where facilities exist to manage it. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

I really don't know

10. Officer Response.

Noted.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I'm not sure/I don't know

12. Please give a reason for your answer to Question 11.

I don't know

12. Officer Response.

Noted.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No

13. Officer Response.

Noted

14. Do you have any comments on the Executive Summary?

Very long

14. Officer Response.

Comment noted. The consultation document has been drafted with plain English in mind and made as easy to read as possible. However it was difficult to avoid the use of jargon, abbreviations and acronyms altogether and waste is a technical subject. The Publication WCS will be worded as simply as possible with a broad audience in mind.

15. Do you have any comments on Section 1?

Number 297 Type IND Name Lynn Richmond Organisation not applicable/not provided

I did not understand it all

15. Officer Response.

Comment noted. Please see response to Q14.

16. Do you have any comments on Section 2?

As above

16. Officer Response.

See previous response.

17. Do you have any comments on Section 3?

Again I did not understand it all

17. Officer Response.

Comment noted. Section 17 is necessarily the longest section of the consultation paper however it has been drafted as concisely and simply as the subject matter allows. Please also see previous response.

18. Do you have any comments on Section 4?

No

18. Officer Response.

Noted.

19. Do you have any comments on the Sustainability Appraisal reports?

No

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

No

20. Officer Response.

Noted.

Number 227 Type IND Name Julian Rideout Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I am writing to express my concern about plans to further develop the waste management site at Wing moor Farm. The site already draws considerable traffic on minor roads, which will only increase. There are only 2 access routes, one of which has a frequently flouted weight restriction, which means that the only remaining viable approach could become over used, for a road of its classification, by H.GVs. As the site is presumably intended for the handling of Gloucestershire waste, would it not be more efficient and less polluting if the proposed site were to be more central to the county with a better infrastructure. We are all encouraged these days to consider our carbon footprint, should this not at least be a consideration in this case if waste is to be transported for unnecessary miles to a peripheral site. Some of the land proposed at Wing moor Farm has been described as scrub grassland currently used by a gun club. Cheltenham and District Clay Club is a long established and responsible group which has used the ground for many years. It has made great efforts to improve the site, which have included the planting of 400 trees to improve the landscaping of the shooting layout. The club, of which I am a member, provides a much valued amenity for shooters in the Cheltenham area and its reputation is held very highly as a safe and well run venue for shooting sports. As some of the other sites under consideration have no current use it seems ludicrous that these should not be considered primarily rather than this one which would mean the closure of the club with little likelihood of it being able to relocate. I shall be attending the meeting at Bishops Cleeve Parish Council offices on November 2nd to express my concerns over the use of this site in person.

17. Officer Response.

Comments noted. Dealing with each in turn. PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. For the Wingmoor sites, the assessment identified a potential net increase in traffic and the need for mitigation in certain locations to help increase capacity. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. Whilst the Wingmoor Farm sites are in the northern part of the County rather than the geographical centre, they are located close to Gloucester and Cheltenham which is where most of Gloucestershire's waste is generated. They are also close to Tewkesbury. Treating this waste as close to source as possible is consistent with national and regional policy. The transport impacts of waste being moved from further afield in the County will be minimised through the use of appropriate bulking and transfer facilities. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the 'inclusion criteria' for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that his site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 258 Type IND Name M Robb Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I write to object to the use of all 13 of the sites listed for possible waste treatment in Gloucestershire on the grounds that: Any of these sites could be used for incineration, which I oppose, Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable, I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed, The long term costs to the taxpayer will be higher with incineration, Incinerators act as a disincentive to reduce, reuse and recycle, The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. Large incinerators in other areas of the country are already deemed to be a mistake.

17. Officer Response.

Comments noted. Dealing with each in turn. The Council is currently technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. The contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Following the decision by Defra in October 2010 to withdraw Gloucestershire County Council's Private Finance Investment (PFI) credits (worth £92million), the council is currently carrying out a strategic review of the project. The outcome from the review will be considered by Cabinet in February 2011. Ultimately Gloucestershire County Council has to find an alternative to landfill. Doing nothing is not an option. The contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Research shows that PFI helps deliver projects on time and on budget more effectively than other types of procurement. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly (amortising cost over shorter period) and therefore being unaffordable or there would be a balancing payment on contract expiry. It should not be assumed that economies of scale mean an inflexible solution. GCC recognises that regardless of the type of solution proposed, it is important that the solution must be able to cope with changes in waste volumes and composition, as it is inevitable such changes will happen. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability or a reduced cost to the authority. In terms of incineration acting as a disincentive to recycling, GCC will be procuring a solution that aligns with its recycling and composting objectives. Tonnages are based on achieving 60% recycling capacity and are reviewed regularly using the most up to date figures. 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling as reality proves the contra argument. With regard to the distribution of sites, the council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the county. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary

Number 258 Type IND Name M Robb Organisation not applicable/not provided

between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability.

Number 259 Type IND Name Charles Robb Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I write to object to the use of all 13 sites listed for possible waste treatment in Gloucestershire on the following grounds. Any of these sites could be used for incineration, which I oppose. There are proven alternatives that are better for the environment.

17. Officer Response.

Comments noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.

Number 228 Type IND Name David Robbins Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I write to object to the use of all 13 of the sites listed for possible waste management in Gloucestershire on the grounds that:- 1. Any of these sites could be used for incineration, which I oppose. 2. Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. 3. I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. 4. The long term cost to the taxpayer will be higher with incineration. 5. Incinerators act as a disincentive to reduce, reuse and recycle. 6. The sites are not evenly distributed around the County, giving too little weight to the negative aspects of the transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas. 7. Mechanical Biological Treatment, including Anaerobic Digestion, technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. 8. Large incinerators in other areas of the country are already deemed to be a mistake.

17. Officer Response.

With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 437 Type IND Name Nicola Robbins Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I write to object to the use of all 13 of the sites listed for possible waste management in Gloucestershire on the grounds that:- 1. Any of these sites could be used for incineration, which I oppose. 2. Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. 3. I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. 4. The long term cost to the taxpayer will be higher with incineration. 5. Incinerators act as a disincentive to reduce, reuse and recycle. 6. The sites are not evenly distributed around the County, giving too little weight to the negative aspects of the transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas. 7. Mechanical Biological Treatment, including Anaerobic Digestion, technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. 8. Large incinerators in other areas of the country are already deemed to be a mistake.

17. Officer Response.

Comments noted. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 438 Type IND Name Daniel Robbins Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I write to object to the use of all 13 of the sites listed for possible waste management in Gloucestershire on the grounds that:- 1. Any of these sites could be used for incineration, which I oppose. 2. Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. 3. I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. 4. The long term cost to the taxpayer will be higher with incineration. 5. Incinerators act as a disincentive to reduce, reuse and recycle. 6. The sites are not evenly distributed around the County, giving too little weight to the negative aspects of the transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas. 7. Mechanical Biological Treatment, including Anaerobic Digestion, technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. 8. Large incinerators in other areas of the country are already deemed to be a mistake.

17. Officer Response.

Comments noted. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 386 Type PC Name Elizabeth Roberts Organisation Kings Stanley Parish Council

17. Do you have any comments on Section 3?

The Big Issue is where and if there is going to be an incinerator. Tackling root cause(s) of the waste actually produced (and reducing it) is perhaps equally important, which is why KSPC feels that the County as waste disposal authority must work ever more closely with the Districts (the waste collecting authorities) to divert as much refuse as possible from landfill, and why King's Stanley Parish Council and Leonard Stanley Parish Council were very disappointed that the food waste collection trial could not be extended to the whole of Stroud District & potentially County wide.

17. Officer Response.

Comment noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10 which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. The Council is working hard to promote more waste reduction, re-use and recycling however there will always be a residual element of waste that needs to be treated in a facility or facilities. This represents a more sustainable alternative to disposing of the residual waste to landfill.

Number 445 Type IND Name Laurence Robertson MP Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch		X	
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

I would say at the outset that, in some ways, it is difficult to support or oppose a site when we do not know at this stage what kind of technology, or process, would be used at each given site. What might be acceptable on one site might be unacceptable on another site so it would have been helpful to have established the preferred technology first if that were possible. However I should like to make comments on sites as follows. I should like to object to any proposal to locate a waste site at Easter Park, Ashchurch. The treatment of waste at this site, or anywhere in the location, is alien to the area. It would also carry the potential of blighting the view and landscape for people travelling towards the town at a time when we are trying to encourage visitors. And I am currently .in discussions with an organisation which may be interested in taking over the site to provide a far more attractive activity which would benefit Tewkesbury. I can't give further details of this possible project as it is commercially sensitive. I should also like to object to a further expansion of any of the sites at Wingmoor Farm. The Grundon and Cory sites are controversial within the village and are situated quite close to houses. The activities may be manageable at the moment, although that statement would be contested, but greater usage of these sites could cause problems. I would, therefore, have to say that such sites are already large enough. There is also a clay pigeon shoot, the existence of which would be threatened by further development here. For all these reasons, expansion of these sites is not appropriate. It is difficult for me to make comments on the other sites as they are outside my constituency and it would not, therefore, be appropriate for me to comment on them.

4. Officer Response.

Comments noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. The site is previously developed land having formerly housed industrial uses. Although the site has been cleared it has planning permission for employment development. Modern waste management facilities are acknowledged to be compatible with industrial uses, often being quite similar in character. As the site forms part of the Ashchurch Industrial Estate, the development of a waste management facility here would not be 'alien' to the local area. As stated above, the site is previously developed land and also has planning permission for employment use. As modern waste management facilities are similar in character to industrial uses, it can be argued that a waste facility would have no greater visual impact than an industrial use. The design and layout of any facility would be a matter for detailed negotiation should a planning application for waste use come forward. Notwithstanding the above, the site has not been taken forward into the Publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). It should be noted that by not taking the site forward as an allocation at this stage does not mean

Number 445 Type IND Name Laurence Robertson MP Organisation not applicable/not provided

that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations. In terms of proximity to housing (Wingmoor sites) clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. With regard to the gun club, Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the 'inclusion criteria' for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that his site is taken forward as a formal strategic allocation for waste management in the WCS. Notwithstanding the above, since the site options consultation was undertaken in October 2009 and following discussions with the landowner it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. For this reason, it has been decided that this site will not be taken forward into the publication WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 71 Type IND Name A G Rogers Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
3. Easter Park, Ashchurch		X	

4. Please give a reason for your answers to Question 3.

To read a report that a Council was considering, in particular 'Easter Park' at Ashchurch, to manage household waste is utterly shocking. Couldn't the council decide to site the it next to Glos County Council building!!!, surely there are more people living at Ashchurch than attend the Glos County Council. I believe Easter Park is totally unsuitable as a waste treatment site because of its proximity to a large area of housing at Ashchurch and Northway. I am also concerned about the possibility of flood risk and adding any extra traffic on the extremely busy A46. Tewkesbury has enough problems with flooding and Traffic without adding a vile waste treatment plant. Our answer is NO.

4. Officer Response.

Comments noted. 329 sites were initially looked at across the County including land at Shire Hall which was excluded from further consideration due to flood risk and constraints over deliverability. In terms of proximity to housing, clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. Whilst there is housing to the north of the site, it is to a large extent buffered by existing employment uses. In terms of flood risk, the Strategic Flood Risk Assessment (SFRA) carried out for this site demonstrates that the site is not located in a high risk flood zone. Any proposal of more than 1 hectare would in any case be required to produce a detailed Flood Risk Assessment (FRA). It is important to note that the site already has planning permission for employment use -the principle of development on this site therefore having been established. With regard to traffic impact, the site is well-located for Junction 9 of the M5 and the initial highway assessment carried out suggests the development of a waste facility may even represent a net decrease in traffic compared to the employment use that could be implemented under the current planning permission for the site. Any strategic site allocation made in the publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. Notwithstanding the above, since the site options consultation was undertaken in October 2009 and following discussions with the landowner it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. For this reason, it has been decided that this site will not be taken forward into the publication WCS) It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS national policy and any other material considerations.

Number 239 Type IND Name Teresa Rooney Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I write to raise my objections to Wing moor Farm (all areas) being put forward as a possible site for the treatment of waste. My objections are as follows. I have been a resident in the locality for 22 years and at the time I moved to the area, the then local council site was due to be closed within a couple of years, that was 20 years ago. You cannot go on and on extending these sites to the detriment of the local residents. Over the last few years, we have and still are experiencing problems with flies (all year round), smell of rotting rubbish and gaseous smells, and constant noise from vehicles operating on the site. This is impacting on our everyday lives and we shouldn't "just have to put up with it". Myself and our neighbours constantly complain to the necessary public bodies and whilst our concerns might be listen to/logged, nothing is proactively done to rid the area of these problems. Extending the site at Wingmoor is only going to exacerbate the problems that already exist. Sheep are not permitted to graze on land (owned by Grundons) for fear of the meat becoming contaminated through them eating the grass - what about the humans that live in the area! i.e the hazardous dust etc in the atmosphere. The landscape over the last 20 years has greatly changed and not necessarily for the better. The site is adjacent to Green Belt. The Stoke Road/Bishops Cleeve area already has a considerable amount of traffic and the current infrastructure could not currently support extension of the site. Stoke Road is not conveniently placed, there are other sites which have easier access and are adjacent to the motorway or the major road network. I am a member of the Cheltenham and District Clay Club and would not wish to see these facilities disappear. The Club has been there for at least 30 years and a considerable amount of Members money and hard work has been spent enhancing the landscape of the site over the years. The Club is a non-profit making club and all the money is put back into the Club. The Club is the only proposed site with an activity located on it that has had no provision mentioned for its continuance if its land is used. The Club has a full membership and there is not another Clay Club in the vicinity. Site 2 Area A currently has a footpath/bridleway running through it which is extensively used by horse riders and walkers in the local vicinity. Site 2 Area A - why is there a score of "0" for the Ecological Assessment? There is a Key Wildlife Site in the area. Site 2 Area A is in very close proximity to residential properties at the end of Lowdilow Lane, Elmstone Hardwicke. In considering all the above issues, I would respectfully request that the proposed sites at Wing moor Farm are dropped from the Waste Core Strategy.

17. Officer Response.

Comments noted. Dealing with each in turn. Odour, along with noise and dust are matters that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any 'sensitive receptors'. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning conditions. It is also important to note that the consultation focuses on the provision of waste treatment facilities rather than disposal of waste to landfill, the former being less associated with odour than the latter with waste being delivered into a relatively enclosed environment for treatment. PPS10, states that 'modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health'. Furthermore, the detailed consideration of a waste process and the implications, if any, for human health is the responsibility of the pollution control authorities. PPS10 also states that, where concerns about health are raised, waste planning authorities should avoid carrying out their own detailed assessments rather they should ensure, through drawing from Government advice and research and consultation with the relevant health authorities and agencies, that they have any advice on implications for health. The WPA duly sought the advice from the PCT/NHS through the site options consultation. Whilst it is acknowledged that the Green Belt should generally be protected, PPS10 emphasises that local authorities should 'recognise the particular locational needs of some types of waste management facilities when defining detailed green belt boundaries and, in determining planning applications'. In line with PPS10 companion guidance, should any sites within the Green Belt be specifically allocated within the WCS, it will need to be clearly indicated that they are for waste management purposes only. PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. For the Wingmoor sites, the assessment identified a potential net increase in traffic and the need for mitigation in certain locations to help increase capacity. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic

Number 239 Type IND Name Teresa Rooney Organisation not applicable/not provided

site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the 'inclusion criteria' for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that this site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations. It is acknowledged that there is a public right of way running across the southern part of Area A. If a proposal were to come forward on this site, the public right of way would need to be diverted to the satisfaction of the County Council. The score of '0' given in the ecological assessment indicates a neutral impact. Whilst there is a key wildlife site within 400m of the site, should a proposal come forward any potential impact will be mitigated as necessary. With regards to residential proximity, it is pertinent to have regard to the companion guide to PPS10 states that, 'with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development'.

Number 232 Type IND Name Martin Rudland Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

The sites should be spread throughout the county not restricted as they are & should be distributed to proportionally match present population distribution , & obviously bear in mind any possible future house development lessen traffic . There are places to put some sites out of Zone C, eg NE near Moreton in the Marsh & SE near Cirencester, and out to the west, and not in the AONB if that is a restriction . I note the sites are concentrated within Zone c as it is .

2. Officer Response.

Comment noted. It is essential that the WCS presents a clear spatial strategy concerning what will be built and where. The designation of Zone C is consistent with national and regional policy and reflects the fact that most of Gloucestershire's waste is produced at Gloucester and Cheltenham. The site options consultation paper identifies 10 sites within Zone C and 3 sites outside Zone C. A total of 329 sites were identified on an initial 'long-list' of sites although most of these were dropped for various reasons including site size, flood risk, highways and deliverability. The designation of sites in the more remote parts of the County e.g. Moreton in Marsh would be contrary to national and regional policy which require waste to be managed close to the main arisings.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

Essentially irrelevant considering my response to Q2 . Many places would be OK provided they are not in flood areas nor are environmentally nor health-wise a problem .

4. Officer Response.

Comment noted. In terms of flood risk, the 13 sites included in the site options consultation paper were subjected to a strategic flood risk assessment with any areas of flood risk duly excluded from the site area. Any proposal of more than 1ha on any site would need to be supported by a site-specific Flood Risk Assessment (FRA). In terms of environmental impact, the 13 sites have already been appraised with regard to biodiversity/ecological and landscape impact. Should a detailed proposal come forward this would in all likelihood need to be supported by an Environmental Impact Assessment (EIA). In terms of health, PPS10, states that 'modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health'. Furthermore, the detailed consideration of a waste process and the implications, if any, for human health is the responsibility of the

Number 232 Type IND Name Martin Rudland Organisation not applicable/not provided

pollution control authorities. PPS10 also states that, where concerns about health are raised, waste planning authorities should avoid carrying out their own detailed assessments, rather they should ensure, through drawing from Government advice and research and consultation with the relevant health authorities and agencies, that they have any advice on implications for health. The WPA duly sought the advice from the PCT/NHS through the site options consultation.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Disagree

6. Please give a reason for your answer to Question 5.

As I indicated in my answer to Q2 , there should be a spread across the county AND perhaps there should be more sites, all of which operating on a small scale .

6. Officer Response.

Comment noted. The Government's intention to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I'm not sure/I don't know

8. Please give a reason for your answer to Question 7.

I agree with flexibility , BUT I do not support the preponderance of sites being in Zone C . By the way I am sure of my views so I 'ticked' the nearest circle to fit my views . The first 2 possibilities looked a wee bit loaded !

8. Officer Response.

Comments noted. It is essential that the WCS provides a clear strategy setting out what will be built and where. This will provide certainty and confidence to the development industry and help bring proposals forward. The Council's preferred strategy is to focus the location of new strategic waste management facilities on the area defined as Zone C. This approach is considered to be consistent with national policy (PPS10) and the Regional Waste Strategy. Although the preferred focus for strategic waste management is Zone C, a number of other sites were identified outside this zone in the Forest of Dean and Cotswold District in order to provide suitable flexibility and support for the Zone C sites. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

As in answers to Q2, Q4, Q6 and Q8 spread across county to match population distribution re traffic costs & concomitant vehicle pollutants . There could/should be other sites also to be considered .

Number 232 Type IND Name Martin Rudland Organisation not applicable/not provided

10. Officer Response.

Comment noted. Please see response to Q8.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

Zone C probably fits with much of the county population distribution , and it fits with my ideas as expressed in Q's 2, 4, 6 & 8 and 10 .

12. Officer Response.

Support noted.

14. Do you have any comments on the Executive Summary?

Councils are recycling more than 60% now ie a drive is needed to get people to appreciate that recyclates are valuable (as KentCC found) , and to help the county to attain the highest %age of recycling .

14. Officer Response.

Comment noted. The County Council is already doing a great deal to encourage more waste reduction, re-use and recycling. The Council's target is to achieve at least 60% recycling and composting by 2020 with an aspiration for 70%. This is an ambitious target that exceeds the national target of 50% over the same period. However, even with effective recycling and composting initiatives there will always be an element of 'residual' waste (i.e. the waste leftover after composting and recycling) that will need to be managed. The site options consultation focuses on identifying sites suitable for managing the leftover or residual waste.

15. Do you have any comments on Section 1?

Apparently the amount of waste is dropping, unless that is the waste which is not recycled . But amount of waste can be reduced by a drive to alter the throw away society . Alsopeople are returning tocooking from raw ingredients - less packaging . etc .....

15. Officer Response.

Comment noted. There have been a number of initiatives in this direction such as the Packaging & Packaging Waste Directive (94/62/EC) and the subsequent Packaging (Essential Requirements) Regulations 2003 (S.I. 2003 No 1941), and the County Council welcomes these. 'Producer responsibility' is becoming a key focus in many new legislative changes. However the County Council does not make legislation so is limited in what it can do to bring about change. We do actively participate in a number of groups which lobby for changes in waste legislation such as the Local Government Association, the National Association of Waste Disposal Officers and the County Surveyors Society. We are also in regular contact with local retailers to ensure that we work as close together as possible to promote reduction and recycling messages. In addition to responding to legislative pressure, retailers and major brand owners have for the past 5 years been addressing packaging under the 'Courtauld Commitment'. This national voluntary agreement aims to cut down on the use of packaging materials, reduce their impacts and incorporate more recycled materials into packaging. We are aware of the benefits that the Courtauld Commitment is delivering and of its' importance in reducing the waste impacts of a large number of common household consumable items. Information on progress made to date is easily accessible via case studies and reports on the website of the Waste & Resources Action Programme (WRAP). In March 2010 a second phase of the Courtauld Commitment was launched. This aims to extend the programme deeper into the supply chain in order to multiply the benefits further. The contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire however needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces.

16. Do you have any comments on Section 2?

The waste industry means what ? One wonders what self financial considerations of the waste industry will be controlling the publics environment ?

Number 232 Type IND Name Martin Rudland Organisation not applicable/not provided

16. Officer Response.

Comment noted. The 'waste industry' refers generically to all those private sector organisations involved in waste management.

17. Do you have any comments on Section 3?

One feels that a closed approach is not looking at how the waste sites can reuse / recycle resources in a 'clean' way ; nor how technology is moving closer & closer to 90% reuse / recycle of 'waste' .

17. Officer Response.

Comment noted. Please see response to Q14.

18. Do you have any comments on Section 4?

Are the sites now already decided on ?

18. Officer Response.

Comment noted. The site options consultation paper identified 13 potential site options, 10 located in 'Zone C' and 3 outside. These were derived from an original list of over 300 sites. The Publication WCS will reduce the list from 13 based on the issues raised during the site options consultation. The WCS will then be formally submitted to the Secretary of State and examined by an independent Planning Inspector who will then issue a binding report. The Council will adopt the WCS in line with the report and it is at that stage the sites will finally be 'decided upon'.

Number 347 Type IND Name Jennifer Rudman Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

the thought of more heavy traffic coming up Myers Rd fills me with dread - this is already a busy road with Allstones, which should be re-sited elsewhere, not in the middle of a housing estate. The extra traffic that this landfill will bring up this road, not to mentioned Horton Road, which is already a hazard with the parking and the school sited there - children are so unpredictable. I come out of Hamer St into Myers Rd every day and it is already a danger not being able to see what is coming and lorries - mainly Alstones - coming up the road - with the parked cars on one side it is difficult enough..... please re think this site. why not resite this in a local unused quarry as I believe someone mentioned in the Citizen newspaper. Please please rethink this - its a danger - its a hazard - an accident waiting to happen with all the extra traffic!!!!!

2. Officer Response.

Comments noted. It is important to note that the consultation did not relate to potential landfill. It relates to waste treatment which is very different. This will typically involve industrial style buildings with the waste being delivered into an enclosed environment prior to being treated. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. In relation to Site 7, Land North of Railway triangle, notwithstanding the above, the site has not been taken forward into the publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the Publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
7. Land north of Railway Triangle, Gloucester	X		

4. Please give a reason for your answers to Question 3.

Number 347 Type IND Name Jennifer Rudman Organisation not applicable/not provided

My answer really is the same as above - its not right to have this sited near a housing estate - when people are travelling to lovely Gloucester on the train - what a site to behold!!!!! please think of Gloucester's future.....we know this is needed but not here - it must be sited somewhere else not in a city centre!!!

4. Officer Response.

Comment noted. Please refer to previous response.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

6. Please give a reason for your answer to Question 5.

Unofrtunately its remembering what has been said in the proposals now that i am completing this form. would hav been nice to have at the side briefly what they were - therefore i cannot comment sadly.

6. Officer Response.

Comment noted. A separate evidence paper on the RSS urban extensions was produced in support of the main site options consultation paper and clearly cross-referenced. The WCS has a role to play in ensuring all new development is underpinned by appropriate waste management infrastructure (e.g. recycling facilities). The site options consultation paper however focuses on identifying a site or sites suitable for accommodating a strategic waste management facility and there has been no interest from either waste operators or the developers leading the urban extensions in providing this type of facility as part of the development. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead their waste management requirements will be addressed through the general policies and requirements of the WCS

7. Do you support the identification of sites outside Zone C?

I do not support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

Mainly because I do not know these sites well enough to comment on to be honest = as I do not live near these areas so dont know whether they are appropriate or not!

10. Officer Response.

Noted.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I'm not sure/I don't know

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No I dont - however someone did mention in the local paper the possibility of a local unused quarry but where that is I am uncertain. there must be areas within

Number 347 Type IND Name Jennifer Rudman Organisation not applicable/not provided

Gloucestershire that are no-where near residential areas that could be used!?

13. Officer Response.

Noted. Although quarries have historically been associated with waste disposal (namely landfill), this consultation was to discuss sites suitable for residual waste treatment (not landfill). Quarries do not fall within the inclusion criteria outlined in Technical Evidence paper WCS-N (with the exception of those quarries with existing waste management licenses).

Number 170 Type UTL Name Mike Ryan Organisation National Grid

17. Do you have any comments on Section 3?

Overview - National Grid National Grid is a leading international energy infrastructure business. In the UK National Grid's business includes electricity and gas transmission networks and gas distribution networks as described below. Electricity Transmission National Grid, as the holder of a licence to transmit electricity under the Electricity Act 1989, has a statutory duty to develop and maintain an efficient, co-ordinated and economical transmission system of electricity and to facilitate competition in the supply and generation of electricity. National Grid operates the national electricity transmission network across Great Britain and owns and maintains the network in England and Wales, providing electricity supplies from generating stations to local distribution companies. We do not distribute electricity to individual premises ourselves, but our role in the wholesale market is key to ensuring a reliable and quality supply to all. National Grid's high voltage electricity system, which operates at 400,000 and 275,000 volts, is made up of approximately 22,000 pylons with an overhead line route length of 4,500 miles, 420 miles of underground cable and 337 substations. Separate regional companies own and operate the electricity distribution networks that comprise overhead lines and cables at 132,000 volts and below. It is the role of these local distribution companies to distribute electricity to homes and businesses. To facilitate competition in the supply and generation of electricity, National Grid must offer a connection to any proposed generator, major industry or distribution network operator who wishes to generate electricity or requires a high voltage electricity supply. Often proposals for new electricity projects involve transmission reinforcements remote from the generating site, such as new overhead lines or new development at substations. If there are significant demand increases across a local distribution electricity network area then the local network distribution operator may seek reinforcements at an existing substation or a new grid supply point. In addition National Grid may undertake development works at its existing substations to meet changing patterns of generation and supply. Gas Transmission National Grid owns and operates the high pressure gas transmission system in England, Scotland and Wales that consists of approximately 4,300 miles of pipelines and 26 compressor stations connecting to 8 distribution networks. National Grid has a duty to develop and maintain an efficient co-ordinated and economical transmission system for the conveyance of gas and respond to requests for new gas supplies in certain circumstances. New gas transmission infrastructure developments (pipelines and associated installations) are periodically required to meet increases in demand and changes in patterns of supply. Developments to our network are as a result of specific connection requests e.g. power stations, and requests for additional capacity on our network from gas shippers. Generally network developments to provide supplies to the local gas distribution network are as a result of overall demand growth in a region rather than site specific developments. Gas Distribution National Grid also owns and operates approximately 82,000 miles of lower-pressure distribution gas mains in the north west of England, the west Midlands, east of England and north London - almost half of Britain's gas distribution network, delivering gas to around 11 million homes, offices and factories. National Grid does not supply gas, but provides the networks through which it flows. Reinforcements and developments of our local distribution network generally are as a result of overall demand growth in a region rather than site specific developments. A competitive market operates for the connection of new developments. National Grid and Local Development Plan Documents The Energy White Paper makes clear that UK energy systems will undergo a significant change over the next 20 years. To meet the goals of the white paper it will be necessary to revise and update much of the UK's energy infrastructure during this period. There will be a requirement for: ? An expansion of national infrastructure (e.g. overhead power lines, underground cables, extending substations, new gas pipelines and associated installations). ? New forms of infrastructure (e.g. smaller scale distributed generation, gas storage sites). Our gas and electricity infrastructure is sited across the country and many stakeholders and communities have an interest in our activities. We believe our long-term success is based on having a constructive and sustainable relationship with our stakeholders. Our transmission pipelines and overhead lines were originally routed in consultation with local planning authorities and designed to avoid major development areas but since installation much development may have taken place near our routes. We therefore wish to be involved in the preparation, alteration and review of Development Plan Documents (DPDs) which may affect our assets including policies and plans relating to the following issues: ? Any policies relating to overhead transmission lines, underground cables or gas pipeline installations ? Site specific allocations/land use policies affecting sites crossed by overhead lines, underground cables or gas transmission pipelines ? Land use policies/development proposed adjacent to existing high voltage electricity substation sites and gas above ground installations ? Any policies relating to the diverting or undergrounding of overhead transmission lines ? Other policies relating to infrastructure or utility provision ? Policies relating to development in the countryside ? Landscape policies ? Waste and mineral plans In addition, we also want to be consulted by

Number 170 Type UTL Name Mike Ryan Organisation National Grid

developers and local authorities on planning applications, which may affect our assets and are happy to provide pre-application advice. Our aim in this is to ensure that the safe and secure transportation of electricity and gas is not compromised. National Grid infrastructure within Gloucestershire County Council's administrative area Electricity Transmission National Grid's high voltage electricity overhead transmission lines / underground cables within Gloucestershire County Council's administrative area that form an essential part of the electricity transmission network in England and Wales include the following: ? 4YU line 400kV route from Rassau substation in Wales to Walham substation in Tewkesbury ? 4TE line 400kV route from Walham substation in Tewkesbury to Cowley substation in South Oxfordshire ? ZF line 400kV route from Feckenham substation in Redditch to Melksham substation in North Wiltshire District ? ZFB line 400kV route from Walham substation in Tewkesbury to Feckenham substation in Redditch The following substations are also located within the administrative area of Gloucestershire County Council: ? Walham substation - 400kV National Grid has provided information in relation to electricity transmission assets via the following internet link: http://www.nationalgrid.com/uk/LandandDevelopment/DDC/GasElectricNW Gas Transmission National Grid has the following gas transmission assets located within the administrative area of Gloucestershire County Council: Pipeline Feeder Detail 1496 14 Feeder Sapperton / Cirencester 1500 2 Feeder Wormington / Gilwern 2696 23 Feeder Wormington / Tirley National Grid has provided information in relation to gas transmission assets via the following internet link: http://www.nationalgrid.com/uk/LandandDevelopment/DDC/GasElectricNW Gas Distribution Wales and the West Utilities own and operate the local gas distribution network in Gloucestershire area. Contact details for Wales and the West Utilities can be found on the Energy Networks website: www.energynetworks.org Further Advice National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. In addition the following publications are available from our web site or by contacting the team below: ? National Grid Electricity Transmission plc, Electricity Act 1989 - Schedule 9 Statement, preservation of amenity ? Specification for Safe Working in the Vicinity of National Grid High Pressure Gas Pipelines and Associated Installations - Requirements for Third Parties ? A sense of place - Design guidelines for development near high voltage overhead lines

17. Officer Response.

Comments regarding the existing role of National Grid noted. Comments concerning existing electricity and gas transmission infrastructure in Gloucestershire noted. Comment concerning the role of Wales and the West Utilities in gas distribution in Gloucestershire noted.

Number 384 Type IND Name Ben Sadler Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I am writing to object to the site area C at Wingmoor Farm East being considered as a suitable site for treatment of waste. This site is not scrub land as suggested has had landscaping work done there. Oak, Ash, Cherry, Poplar, Chestnut, Hazel and Hawthorn trees have all been planted there as well as landscaping. There is a lot of traffic to Wingmoor farm and the area has a large number of lorries already and the site is not central to Gloucestershire. The area around Bishops Cleeve and Stoke Orchard already has more than its fair share of landfill and there are several of the other sites that have better access to the motorway and major roads. Several of the other sites are alread vacant where as this siteis the only one with an activity located on it and that has had no provision mentioned for its continuance if its land is used. It has taken many years of hard work by the members of this club to transform this site into the present layout suitable for our sport and to make the club the warm and friendly place it is. There have apart from landscaping been several memorial trees planted for members who are sadly no longer with us most of which are too large to be easily moved to another site. I would ask you to consider the effect that losing this sporting venue would have upon those who have given so freely of their time and energy to enable others to enjoy our sport, most of whom are too old to start over as it takes many years to make a site suitable for our sport.

17. Officer Response.

Comments noted. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the inclusion criteria for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that this site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 395 Type IND Name Carl Sadler Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I am writing to object to the site area C at Wingmoor Farm East being considered as a suitable site for treatment of waste. This site is not scrub land as suggested has had landscaping work done there. Oak, Ash, Cherry, Poplar, Chestnut, Hazel and Hawthorn trees have all been planted there as well as landscaping. There is a lot of traffic to Wingmoor farm and the area has a large number of lorries already and the site is not central to Gloucestershire. The area around Bishops Cleeve and Stoke Orchard already has more than its fair share of landfill and there are several of the other sites that have better access to the motorway and major roads. Several of the other sites are alread vacant where as this site is the only one with an activity located on it and that has had no provision mentioned for its continuance if its land is used. It has taken many years of hard work by the members of this club to transform this site into the present layout suitable for our sport and to make the club the warm and friendly place it is. There have apart from landscaping been several memorial trees planted for members who are sadly no longer with us most of which are too large to be easily moved to another site. I would ask you to consider the effect that losing this sporting venue would have upon those who have given so freely of their time and energy to enable others to enjoy our sport, most of whom are too old to start over as it takes many years to make a site suitable for our sport.

17. Officer Response.

Comments noted. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the inclusion criteria for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that this site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 418 Type IND Name Robert Sanders Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

I agree with the investigation that identified area "C"

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X		
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre	X		
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester	X		
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West			

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Disagree

6. Please give a reason for your answer to Question 5.

A system with adequate room for expansion should be designed from the start without the need of subsequent additional sites which will be difficult to fully investigate.

6. Officer Response.

Comment noted. At this stage it is not known whether one or more sites will be needed for waste treatment facilities in Gloucestershire. The proposed urban extensions offer the scope to incorporate waste treatment into the design and layout of the development from the outset. However, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

Some processing in the Cinderford and Cirencester location is necessary to reduce transportation.

Number 418 Type IND Name Robert Sanders Organisation not applicable/not provided

8. Officer Response.

Support noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

see answer to question 8

12. Officer Response.

See previous response.

Number 96 Type PC Name Philip Saunders Organisation West Dean Parish Council

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X	X	
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre	X		
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester	X		
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West			

4. Please give a reason for your answers to Question 3.

3. Traffic congestion and proximity to school and residential. 7. Suitable only for domestic waste, i.e. no toxic waste 8. Greenfield site should be used for food production 9. Concerns re: flood risk.

4. Officer Response.

Comments noted. Dealing with each site in turn. Site 3 - Easter Park. In terms of traffic impact the initial highway assessment carried out for this site suggests that a waste facility could actually lead to a net reduction in traffic, compared with that which could be generated if the existing planning permission for employment development were to be implemented. Notwithstanding the above, the site has not been taken forward into the Publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Site 7 - Land North of Railway Triangle. The site has not been taken forward into the publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering

Number 96 Type PC Name Philip Saunders Organisation West Dean Parish Council

residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Site 8, Nastend Farm, this site is a green field, but crucially it is allocated for employment use in the Stroud Local Plan. Site 9 - Netheridge. Although parts of this site flood, the strategic flood risk appraisal has been used and the site boundary identified in the site options consultation paper does not include any area at risk of flooding. Any proposal of more than 1 hectare in size would need to be supported by a detailed Flood Risk Assessment (FRA) regardless of whether it is in the floodplain. Notwithstanding the above, since the site options consultation was undertaken in October 2009 and following discussions with the landowner it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. For this reason, it has been decided that this site will not be taken forward into the Publication WCS. It should be noted that by not taking any site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

6. Please give a reason for your answer to Question 5.

To locate waste facilities close to the causes of waste.

6. Officer Response.

Support noted. The integration of waste management facilities into the urban extensions would allow waste from these developments and the wider Gloucester and Cheltenham area to be treated close to source in line with national and regional policy. However, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

to locate waste facilities close to the causes of waste. To avoid unnecessary transport of waste.

8. Officer Response.

Comment noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney		X	
3. Land at Lydney Industrial Estate, Lydney	X		

Number 96 Type PC Name Philip Saunders Organisation West Dean Parish Council

10. Please give a reason for your answers to Question 9.

Hurst farm is a south facing site on Greenfield agricultural land which should be used for food production. The small finger of land to the west of this site where Plummers Brook merges into Lydney East Marsh is a valuable biodiversity site.

10. Officer Response.

Comment noted. Whilst Hurst Farm is currently farmland it is allocated for employment uses under Policy (R) F Lydney 7 of the adopted Forest of Dean Local Plan. The principle of development in this location has therefore already been accepted. It is for the landowner to decide the form of development that comes forward. Modern waste management facilities are generally compatible with industrial uses. In relation to biodiversity issues, these have been carefully considered by the County's Principal Ecologist and the Gloucestershire Centre for Environmental Records (GCER). Whatever development takes place on this site, there is no reason to suggest that sensitive areas and e.g. nearby Key Wildlife Sites will be adversely impacted. Having regard to forecast capacity requirements (i.e. the number of sites needed) and the need to manage waste close to source in line with national policy, it has been decided not to allocate any strategic sites outside the area referred to as Zone C (the central area of Gloucestershire). As this site is outside Zone C it is not being taken forward. Also, the lack of waste industry interest in response to this site through the site options consultation (2009) raises question marks over the deliverability of the site for waste management purposes. Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

20. Do you have any comments on the Habitat Regulations report?

Not up to date, not sufficiently 'far sighted' to encompass the potential for biodiversity restortation

20. Officer Response.

Comment noted. The HRA Reports are fully up-to-date and have the backing of Natural England, the primary statutory consultee in this area of work.

Number 97 Type IND Name Philip Saunders Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I write to object to the use of all 13 of the sites listed for possible waste treatment in Gloucestershire on the grounds that: Any of these sites could be used for incineration, which I oppose. Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. The long term costs to the taxpayer will be higher with incineration. Incinerators act as a disincentive to reduce, reuse and recycle. The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. Large incinerators in other areas of the country are already deemed to be a mistake.

17. Officer Response.

Comments noted. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 210 Type IND Name Paul Savage Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

If the site is located well away from residential areas and not down wind of any significant communities then this would be acceptable. There are sites that would fullfill this criteria in zone C, however, even more remote sites would be preferable. I will therefore give a qualified support to this.

2. Officer Response.

Support for Zone C noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. Identifying remote sites some distance from Gloucester and Cheltenham would be contrary to national and regional policy which requires waste to be treated close to source with most waste arising in Gloucester and Cheltenham. It is essential that the WCS provides a clear strategy setting out what will be built and where. This will provide certainty and confidence to the development industry and help bring proposals forward. The Council's preferred strategy is to focus the location of new strategic waste management facilities on the area defined as Zone C. This approach is considered to be consistent with national policy (PPS10) and the Regional Waste Strategy. Although the preferred focus for strategic waste management is Zone C, a number of other sites were identified outside this zone in the Forest of Dean and Cotswold District in order to provide suitable flexibility and support for the Zone C sites. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch		X	
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre	X		
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester	X		
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West	X	X	

Number 210 Type IND Name Paul Savage Organisation not applicable/not provided

4. Please give a reason for your answers to Question 3.

The areas I have indicated as suitable are not down wind of major urban developments and have reasonably good road access. An increase in road traffic in these areas would appear to have minimal impact. The other areas deemed not suitable would be significantly impacted by traffic, pollution, smells etc

4. Officer Response.

Comments noted. Odour, along with noise and dust are matters that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any 'sensitive receptors'. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning conditions. In terms of traffic impact, all of the sites included in the site options consultation paper were subjected to an initial highway assessment and deemed suitable. Clearly the level and nature of any impact will vary between sites. Any strategic site allocation made in the Publication WCS will be supported by development criteria including those relating to transport and highways. Should a planning application be progressed on any of the strategic site allocations this would need to be supported by a detailed Transport Assessment and Travel Plan. In terms of potential pollution, PPS10, states that 'modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health'. Furthermore, the detailed consideration of a waste process and the implications, if any, for human health is the responsibility of the pollution control authorities.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Disagree

6. Please give a reason for your answer to Question 5.

Again this would bring waste treatment too close to urban developments

6. Officer Response.

Comment noted. Please see response to Q2. Notwithstanding this, it is significant to note that the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a waste treatment facility or facilities as part of those proposals. Furthermore, the Government's intention to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

The more remote the sites the better for the communities in Gloucestershire and the less the controversy they would generate

8. Officer Response.

Comment noted. Please see Q2.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney	X		
3. Land at Lydney Industrial Estate, Lydney	X		

Number 210 Type IND Name Paul Savage Organisation not applicable/not provided

10. Please give a reason for your answers to Question 9.

These sites are at least well away from major developments and urban centres

10. Officer Response.

Comment noted. Please see response to Q2.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

This is a qualified support! There are sites in zone C that may be suitable (just) but outside zone c is preferable

12. Officer Response.

Comment noted. Please also see response to Q2.

Number 305 Type IND Name Paul Savage Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

This is a qualified support. The sites in Zone C are suitable for local low level waste processing only due to their proximity to housing etc. The exception to this is Javelin Park that could be used for a major residual waste treatment plant

2. Officer Response.

Support noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. Support for Javelin Park noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch		X	
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence		X	
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works		X	
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

* those marked 'not suitable' meaning for a major residual waste treatment plant A full explanation is included in Appendix I

4. Officer Response.

Comments noted. Dealing with each point in turn. In terms of proximity to housing, clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and

Number 305 Type IND Name Paul Savage Organisation not applicable/not provided

enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10 which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. Support for Javelin Park noted. With regard to meteorological issues, an Environmental Impact Assessment would be required at the planning application stage should a detailed proposal come forward on any of these sites. If a thermal technology was selected, the EIA would be required to investigate and report upon the issues relating to dispersion and specific local conditions of this type would need to be considered. In terms of road access, PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. In respect of Wingmoor Farm, potential junction improvements were for example highlighted in order to increase capacity at some nearby A435 junctions. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. In terms of location, Wingmoor Farm is considered to be centrally located within the County. It lies within Zone C and is close to Cheltenham and Gloucester the two main sources of municipal waste in Gloucestershire.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

6. Please give a reason for your answer to Question 5.

The areas outlined do not have (or appear not to have!) areas that could be designated for their own treatment facility hence it would make sense to include them in the overall Gloucestershire plan at an early stage.

6. Officer Response.

Support noted. The inclusion of waste treatment facilities into the early design and layout of development presents the opportunity to effectively integrate such facilities as well as potentially providing locally generated heat and power. Notwithstanding this, it is significant to note that the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

Number 305 Type IND Name Paul Savage Organisation not applicable/not provided

Local treatment at these sites could reduce the pressure on proposed sites in Zone C and would possibly reduce road transport of waste.

8. Officer Response.

Support noted. It is essential that the WCS provides a clear strategy setting out what will be built and where. This will provide certainty and confidence to the development industry and help bring proposals forward. The Council's preferred strategy is to focus the location of new strategic waste management facilities on the area defined as Zone C. This approach is considered to be consistent with national policy (PPS10) and the Regional Waste Strategy. Although the preferred focus for strategic waste management is Zone C, a number of other sites were identified outside this zone in the Forest of Dean and Cotswold District in order to provide suitable flexibility and support for the Zone C sites. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney	X		
3. Land at Lydney Industrial Estate, Lydney	X		

10. Please give a reason for your answers to Question 9.

Sites 1,2 & 3 may be suitable. If the treatment is MBT then these sites could be suitable. They would probably not be suitable for incineration due to their remote location.

10. Officer Response.

Comment noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10 which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. These sites will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the sites forward as allocations at this stage does not mean that the sites are unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

Use of sites outside Zone C for low level treatment could reduce road transportation of waste

Number 305 Type IND Name Paul Savage Organisation not applicable/not provided

12. Officer Response.

Support noted.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No

13. Officer Response.

Noted.

14. Do you have any comments on the Executive Summary?

No comment

14. Officer Response.

Noted.

15. Do you have any comments on Section 1?

No Comment

15. Officer Response.

Noted.

16. Do you have any comments on Section 2?

None

16. Officer Response.

Noted.

17. Do you have any comments on Section 3?

Further evaluation is required with input from the Meteorological perspective and from an expert in the dispersal of gaseous emissions produced by industrial processes. This is a major oversight in the criteria for judging suitability. See appendix II and III

17. Officer Response.

Comment noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10 which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. The impact of different technologies at each site will be further assessed through modelling carried out as part of the Habitat Regulations Assessment report that will accompany the Publication WCS.

18. Do you have any comments on Section 4?

None (at this stage)

18. Officer Response.

Noted.

Number 305 Type IND Name Paul Savage Organisation not applicable/not provided

19. Do you have any comments on the Sustainability Appraisal reports?

The positive effects support the use of the site at Javelin Park (ie minimal impact on environment, traffic etc etc) - see section 24. Sect 25 - the negatives, recognises the air emission issues from combustion that I have raised

19. Officer Response.

Comments noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10 which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.

20. Do you have any comments on the Habitat Regulations report?

None

20. Officer Response.

Noted.

Number 428 Type IND Name Anna Savin Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

I think if you generate waste you should be able to deal with it locally, if it's not visible it isn't something you need to think about

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X	X	
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

I think as far as possible it needs to be away from where people are living in large numbers, near good roads and not spoil ares of natural beauty

4. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. Only one site has been identified in the Cotswold Area of Outstanding Natural Beauty (AONB) at Foss Cross and that site already accommodates an existing waste facility (household recycling centre).

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Agree

6. Please give a reason for your answer to Question 5.

Number 428 Type IND Name Anna Savin Organisation not applicable/not provided

waste neads to be central to any housing stragey it's part of essential infrastructure like schools, hospitals etc

6. Officer Response.

Support noted. However, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

If household waste can be composted/sorted/reused on a large scale in Lydney it does not need to be transported to Gloucester

8. Officer Response.

Comment and support for Lydney sites noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney		X	
3. Land at Lydney Industrial Estate, Lydney	X		

10. Please give a reason for your answers to Question 9.

These ares also need to be aware of waste and not have it transported elsewhere, better to do locally then transport waste for miles

10. Officer Response.

Comment noted. Whilst the Council's preferred strategy is to provide strategic waste management facilities within Zone C, there is likely to be a role for sites outside this area e.g. smaller scale provision or supporting infrastructure e.g. waste transfer. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. These sites will therefore not be taken forward into the publication WCS. It should be noted that by not taking the sites forward as allocations at this stage does not mean that the sites are unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

as Q10

Number 428 Type IND Name Anna Savin Organisation not applicable/not provided

12. Officer Response.

See previous response.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

no

13. Officer Response.

Noted.

14. Do you have any comments on the Executive Summary?

no

14. Officer Response.

Noted.

15. Do you have any comments on Section 1?

no

15. Officer Response.

Noted.

16. Do you have any comments on Section 2?

no

16. Officer Response.

Noted.

17. Do you have any comments on Section 3?

no

17. Officer Response.

Noted.

18. Do you have any comments on Section 4?

no

18. Officer Response.

Noted.

19. Do you have any comments on the Sustainability Appraisal reports?

no

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

no

20. Officer Response.

Number 428 Type IND Name Anna Savin Organisation not applicable/not provided

Noted.

Number 335 Type IND Name David Searle Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

While it is preferable that waste sites should be outside the AONB sites there should be no consideration of sites within the urban boundaries of settlements. 'Zone C' should exclude the urban areas of Gloucester, Cheltenham, Tewkesbury etc. Not only would it be highly unsuitable to site waste near to urban/housing areas there are better potential uses for these sites such as housing avoid the need for housing allocation in rural areas.

2. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. In relation to Site 7, Land North of Railway Triangle, the site has not been taken forward into the publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X

Number 335 Type IND Name David Searle Organisation not applicable/not provided

4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

As stated in Question 2 it is unsuitable to place a waste site in an urban area when there are clearly rural alternatives that will be further away from people and therefore negatively impact on fewer residents.

4. Officer Response.

Comment noted. See previous response.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Disagree

6. Please give a reason for your answer to Question 5.

Again waste sites and urban areas should not be mixed where at all possible, particularly when plenty of rural alternatives in a county such as Gloucestershire exist.

6. Officer Response.

Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should `provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. In terms of development within rural areas, although there may be sites available in more isolated locations away from populated areas, locating strategic waste management facilities in these areas would be contrary to policy laid out in PPS10 and the Regional Waste Strategy which require waste to be treated close to source in accordance with the proximity principle. Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or

Number 335 Type IND Name David Searle Organisation not applicable/not provided

near existing settlements. In relation to Site 7, since the site options consultation was undertaken in October 2009, the Waste Planning Authority has carefully considered all the issues related to this site. Whilst it is fully recognised that it does currently serve a useful function as a site primarily handling construction and demolition waste, it will not be taken forward as a strategic site allocation due to highways and access issues. The site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Any waste proposals that come forward on this site will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

I think there could be a good case for looking for a support site on the Forest of Dean side of the river as otherwise waste transport is going to have to cover a considerable distance from towns such as Lydney. If some of this could be dealt with locally it would be preferable.

8. Officer Response.

Comments on Forest of Dean sites are noted. Having regard to forecast capacity requirements (i.e. the number of sites needed) and the need to manage waste close to source in line with national policy, it has been decided not to allocate any strategic sites outside the area referred to as Zone C (the central area of Gloucestershire). With regard to Hurst Farm, as this site is outside Zone C it is not being taken forward. Also, the lack of waste industry interest in response to this site through the site options consultation (2009) raises question marks over the deliverability of the site for waste management purposes. Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations. With regard to Lydney Industrial Estate, as this site is outside Zone C it is not being taken forward. Also, the lack of waste industry interest in response to this site through the site options consultation (2009) raises question marks over the deliverability of the site for waste management purposes. It should be noted that existing facilities for waste management are present on the site and their contribution to the County's waste network is recognised. Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X

Number 335 Type IND Name David Searle Organisation not applicable/not provided

3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

I am not familar with the particular sites

10. Officer Response.

Noted.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

As answer to question 8

12. Officer Response.

See previous response.

Number 57 Type IND Name Arlinda Seljimi Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
4. Javelin Park, Haresfield		X	

4. Please give a reason for your answers to Question 3.

I write to object to the use of Javelin Park for possible waste treatment including a PFI Incineration contract on the grounds that; I am hoping to have children within the next few years and would fear for their good health if an Incineration plant were to be built at Javelin Park with the resultant toxic fallout. Large and small incinerators in other areas of the country have already been deemed a mistake as they were unable to keep within their discharge limits and have been closed down. Local residents to other Incineration sites have proved a link between the toxic fallout from incineration and their increased risk of serious health issues, causing the sites to be closed or having restricted use conditions applied. I strongly object to the use of Javelin Park or any of the other waste sites in this County or bordering Counties for Incineration as the toxic fallout will accumulate over time and result in increased dioxins levels in all farm products especially in the local milk production. I even more strongly object to the proposed site at Javelin Park having 100,000 tons of surplus capacity with the intention of importing toxic waste from other parts of the country and incinerating it here with the resultant toxic fallout. Incineration creates toxic fly ash, which contains dioxins and is very dangerous over the long term for local resident's health. The incineration residue has to be transported and buried creating a further risk to nearby residents; this is unacceptable. The long term costs to the local taxpayer will be higher with incineration. I understand that incineration PFI contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer.

4. Officer Response.

Comments noted. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 130 Type IND Name Fred and Carol Shaftoe Organisation not applicable/not provided

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester		X	

10. Please give a reason for your answers to Question 9.

We are concerned about possible changes to Fosse Cross. We like many residents in Chedworth live less than a mile away and are directly downwind from the site. This especially applies to Fields Road, Hemplands, Lower Chedworth and Pancake Hill. We know nobody will want such a site near them but we trust that you have taken account of the wind direction will have in blowing noxious fumes towards a large village.

10. Officer Response.

Comments noted. Odour is a detailed matter that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any 'sensitive receptors'. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning conditions. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. This site will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 275 Type IND Name Stephen Sharpe Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	

4. Please give a reason for your answers to Question 3.

I write to raise my concern over the proposal to use Area C at Wing moor Farm East for the treatment of waste (or any other use for that matter). Whilst not a member, I do frequent Cheltenham & District Clay Club with my son frequently, it is one of only a few clay shooting grounds in the county. To remove this facility will mean that I need to travel further for my sport, probably out of the county. This clay ground has taken years to establish and even if an alternative site was provided (and I understand this is not the case) it would take some considerable time to get to the standard of the current ground. Surely if additional waste sites are required they could be located somewhere more central in the county and thus reduce the miles travelled to get there and traffic and associated pollution? Or if not more central at least in a location with better and easier access than Stoke Orchard? I also understand that some alternative sites are already vacant? So why not use one of these sites instead?

4. Officer Response.

Comments noted. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the inclusion criteria for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that this site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 238 Type IND Name Venkatesh Shenoi Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

The 2 sites are available, possibly suitable for the purpose

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester	X		

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

6. Please give a reason for your answer to Question 5.

not sure

6. Officer Response.

Comment noted. Significantly, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the Government's intention to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

It is always useful to have potential sites in case opportunites are presented for future use.

8. Officer Response.

Support noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 238 Type IND Name Venkatesh Shenoi Organisation not applicable/not provided

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney	X		
3. Land at Lydney Industrial Estate, Lydney	X		

10. Please give a reason for your answers to Question 9.

site access - particularly rail access also possible development of barge/conveyor to sites

10. Officer Response.

Comments noted including support for sustainable transport options. Lydney Docks has significant potential but currently there are no barged freight movements. The Publication WCS contains Core Policy WCS14 which covers sustainable transport. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. These sites will therefore not be taken forward into the publication WCS. It should be noted that by not taking the sites forward as allocations at this stage does not mean that the sites are unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

to explore the full range favourable sites and potential uses

12. Officer Response.

Support noted.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No

13. Officer Response.

Noted

14. Do you have any comments on the Executive Summary?

No

14. Officer Response.

noted

15. Do you have any comments on Section 1?

No

15. Officer Response.

noted

16. Do you have any comments on Section 2?

Number 238 Type IND Name Venkatesh Shenoi Organisation not applicable/not provided

No

16. Officer Response.

noted

17. Do you have any comments on Section 3?

No

17. Officer Response.

Noted

18. Do you have any comments on Section 4?

No

18. Officer Response.

noted

19. Do you have any comments on the Sustainability Appraisal reports?

No

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

No

20. Officer Response.

Noted.

Number 54 Type IND Name Paul Sheridan Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I am writing in response to the waste strategy consultation. It is hard to comment on the strategy when the technologies to be employed are presently not known, but I would like to make the following points. I believe a large incinerator is not the way forward; it would have a contract over 20 years and would require a set amount to feed it, which can act as a disincentive to recycling and reducing waste generally. There may be much less waste and better ways to treat it in the future so being locked into a long contract would be a mistake. Incineration and several of the methods proposed produce toxic fly ash which then has to be disposed of creating a risk to the health of people near the burial sites. Mechanical Biological Treatment is a proven alternative and is better for the environment. Localised sites would be best to minimise transport and be flexible to amounts of waste.

17. Officer Response.

Comments noted. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 105 Type IND Name Clare Sheridan Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I write to object to the use of all 13 of the sites listed for possible waste treatment in Gloucestershire on the grounds that: a. Any of these sites could be used for incineration, which I oppose. b. Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. c. I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. d. The long term costs to the taxpayer will be higher with incineration. e. Incinerators act as a disincentive to reduce, reuse and recycle. f. The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas g. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. h. Large incinerators in other areas of the country are already deemed to be a mistake

17. Officer Response.

With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 146 Type OTH Name Clare Sheridan Organisation GlosVAIN

17. Do you have any comments on Section 3?

GlosVAIN is an alliance of Parish and Town Councils and residents opposed to the use of Incineration as a means of waste disposal in Gloucestershire. We write to say that some of the 13 sites may well be suitable for waste treatment, provided that the technical solution deployed is not incineration. We would also argue for smaller scale processing with at least one site per District Council area to reduce waste transport mileage. We oppose incineration because: Incineration has a negative impact on climate change. The burning of waste creates more CO2 emissions than other available waste technologies. Incineration is also the most inefficient way to create energy from waste. There are more effective and energy efficient technologies available than incineration. In particular anaerobic digestion (AD) is one of the key technologies that can produce renewable gas or biomethane. Up to 50% of U.K.'s residential gas demand could be met with renewable gas (Ref. A potential for Renewable Gas in the UK a paper by National Grid, January 2009). A report undertaken on behalf of the Greater London Authority shows that incineration technology has the highest greenhouse gas impact, while Mechanical Biological Treatment (MBT) (AD and maturation) technology has the lowest greenhouse gas impact (Ref. Eunomia Greenhouse Gas Balances of Waste Management Scenarios, Report for the Greater London Authority, January 2008). One large incinerator would generate CO2 from transportation of waste over long distances. Incineration destroys valuable resources. A study undertaken for the National Assembly of Wales shows that 93.3% of municipal waste could be recycled and therefore reused. Recyclable materials can drive economic development and create jobs. An incinerator would simply burn much of these resources, requiring the extraction of additional natural resources to manufacture goods, which uses more CO2 and therefore drives climate change. Incineration would inhibit the development of green businesses. Incineration is bad for health. Burning non-toxic metals and plastics creates dioxins. Tiny toxic particles could escape into the atmosphere and build up in surrounding areas, affecting people and livestock. These nano-particles pass easily through membranes of the body into the blood. Nano-particles build up over years and adversely affect health, resulting in an increase in all-cause mortality. Incineration creates toxic waste. After incineration, as much as 30% of what goes in to be burned is left as residues and up to 5% of this is fly ash, which is extremely toxic. Through incineration therefore a large amount of waste may need to be buried and, because it is toxic, disposal is expensive and may lead to health risks for residents living near disposal sites. There are less residuals from other methods of waste disposal such as reduce, reuse, composting and recycling, as well as MBT and AD, and they do not create toxic residues. Incineration is inflexible. A large incinerator would lock the county into a 25+ year-contract. The incinerator would need to operate at full capacity in order to meet operating requirements and any contractual obligations, and this would act as a disincentive to recycling, just at a time when supermarkets are moving towards 100% recyclable packaging. New technology is developing rapidly, providing better and more environmentally friendly solutions to waste treatment, yet the county would not be able to take advantage of these as we would be locked into a long-term contract with an outdated 'dirty' technology. An incinerator would have massive visual impact. A large scale incinerator on any of the 13 sites proposed would be hugely intrusive with most being visible from the Cotswold Escarpment. They are huge buildings. Unlike incinerators, other technologies such as MBT and AD, which are cost effective on a small scale, would blend in better with local surroundings. Incineration is bad for the taxpayer. Apart from being hugely expensive to build and operate with a long term contract, there would be additional costs such as penalties if insufficient waste is provided, costs of upgrading if European safety guidelines are tightened, as well as decommissioning costs. What appears to the County Council as a quick fix solution would bring long-term cost and pain. Other alternatives such as small local MBT and AD are flexible and much less costly, can be run on short term contracts with variable tonnage intake year by year and do not have incineration's 'hidden' costs. Large incinerators in other areas of the country are already deemed to be a mistake.

17. Officer Response.

Comments noted. Dealing with each in turn. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents,

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should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. In terms of small-scale facilities, Publication WCS identifies four strategic site allocations within Zone C. Proposals on other sites may come forward where there is market interest, subject to relevant criteria. The Council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the County. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. The advantages and disadvantages would be investigated further during the procurement process. In terms of CO2 emissions, the heat and power that can be gained from a waste facility offers a real benefit environmentally by reducing our reliance on fossil fuels and creates a potential income of several million pounds per annum for the council. Energy recovery (in the form or electricity and/or heat) will be dealt with under Solution Performance and guarantees provided by contractors and throughout the procurement process. Waste management and the move away from landfill are driven by the Climate Change agenda. Climate change is a wider issue which the development of this solution can positively contribute. Carbon footprint is assessed as part of the life cycle analysis (WRATE0 at ISDS. GCC will ask for details of emissions management as well as any other foreseeable environmental impacts and plans to mitigate these will be requested during competitive dialogue. DEFRA have commented on this issue directly by stating: "The plans (for Gloucestershire) could also make an important contribution to the drive to tackle climate change by delivering estimated net carbon savings of 33,800 tonnes in 2020, compared to the current arrangements, or 64,700 tonnes if the final technology solution includes combined heat and power." With regard to energy generation, incineration is currently the only proven technology to produce energy, Advanced Thermal Treatment and AD are new technologies and are not wholly proven on residual waste. There are developing markets for the outputs from AD, such as using the biogas produced but as discussed above, the process has not been proven on residual waste alone. A key aspect of evaluating the bids will be the balance between the deliverability and risk associated with new technologies against the risk of the technology and markets failing. GCC view health impacts and safety as important and this will be explored at the ISOS, ISDS and competitive dialogue stages. The bidders must demonstrate their ability to deliver facilities that comply with legislation and policy. As with 'monitoring service', it will be discussed during ISDS and competitive dialogue. Various method statements will require Bidders to outline their approach to legislation and compliance. This is standard for any contract/procurement which the council is involved in. This is also an opportunity for the council to explore the concept or not just complying with regulations and emission controls, but also the potential to excel these, and understand the implications and benefits of bettering the proposed solutions. APC (fly-ash) residues would be regulated by the Environment Agency through the Environmental Permitting regime. The HPA has reviewed research undertaken to examine the suggested links between emissions from municipal waste incinerators and effects on health and stated that "Whilst it is not possible to completely rule out adverse health effects from modern, well regulated waste incinerators, any potential damage to the health of those living close by is likely to be very small, if detectable. This is based on assessments of the effects of air pollutants on health and the fact that modern and well managed incinerators make only a very small contribution to local concentrations of air pollutants (PM10s - waste incineration are 0.02% of the total compared with 18% and 22% for road transport and industry (production processes) respectively). Any potential risk of cancer due to residency near to municipal waste incinerators is exceedingly low and probably not measurable by the most modern techniques. PPS10, states that 'modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health'. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries

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that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to visual impact, all sites have been subjected to an initial landscape assessment, with some sites being identified as more suitable than others. The design and layout of any proposal (and therefore its potential visual impact) will be matters for negotiation at the planning application stage should a detailed proposal come forward. A design and access statement and landscape appraisal are likely to be required.

Number 29 Type IND Name Julie Shirley Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch		X	
4. Javelin Park, Haresfield		X	
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence		X	
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works		X	
10. The Park, Wingmoor Farm West	X	X	

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester		X	
2. Hurst Farm, Lydney		X	
3. Land at Lydney Industrial Estate, Lydney		X	

17. Do you have any comments on Section 3?

I write to object to the use of all 13 of the sites listed for possible waste treatment in Gloucestershire on the grounds that: Any of these sites could be used for incineration, which I oppose. Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. The long term costs to the taxpayer will be higher with incineration. Incinerators act as a disincentive to reduce, reuse and recycle. The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for us to all to take responsibility for the disposal of the waste we create in our own areas. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. Large incinerators in other areas of the country are already deemed to be a mistake.

17. Officer Response.

With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter

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period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 134 Type OTH Name Diana Shirley Organisation GlosAIN

17. Do you have any comments on Section 3?

We consider that an holistic approach should be taken by the County Council to deal with Gloucestershire's waste treatment. While some of the thirteen suggested sites may be suitable for the installation of waste treatment technology, we believe that the key is to focus upon developing local, flexible, small scale waste treatment sites, using state of the art technology which is proven to have the least impact upon the planet and the people, and which will be cost effective in the long term. We are opposed to incineration being used to deal with waste at any site in Gloucestershire and support the implementation of environmentally friendly technology, like Mechanical Biological Treatment plants (MBT) with anaerobic digestion (AD). The case against incineration is very clear, and includes the following points (not exhaustive): It is now accepted that climate change is presenting a real threat to the planet and the people, and it is crucial that CO2 emissions are reduced. Councils have a duty to implement technology that has a minimum effect upon climate change. Incineration technology has the highest greenhouse gas impact (Ref. 'Greenhouse Gas Balances of Waste Management Scenarios', Report for the Greater London Authority by Eunomia, January 2008) G.C.C. has a duty of care to the people that they represent, and should adhere to the true meaning of 'the precautionary principle'. It is an accepted fact that incinerators produce bottom and fly ash, which amount to '30-50% by volume of the original waste (if compacted), and require transportation to landfill sites. Abatement equipment in modern incinerators merely transfers the toxic load, notably that of dioxins and heavy metals, from airborne emissions to the fly ash. This fly ash is light, readily windborne and mostly of low particle size. It represents a considerable and poorly understood health hazard. Two large cohort studies in America have shown that fine (PM2.5) particulate air pollution causes increases in all-cause mortality, cardiovascular mortality and mortality from lung cancer, after adjustment for other factors.' (Ref. 'The Health Effects of Waste Incinerators', 4th Report of the British Society for Ecological Medicine, June 2008) 'The Environmental Protection Agency in the USA has recommended safe levels of dioxins, to minimise the risk of cancer, at one thousandth the current UK level.' (Ref. 'Tyseley Incinerator - Health Hazards', Friends of the Earth) Large incinerators are expensive to build, run and decommission. In addition, financial penalties may be imposed if the council fails to provide sufficient waste to 'feed' the incinerator. Problems have already been experienced by local authorities who have installed large incinerators, for example: 1. Nottingham: 'Nottingham City Councillors have admitted that long term contracts agreed in 1973 on their municipal waste incinerator are now causing serious losses....' (Ref. 'Briefing - Up in Smoke', September 2007, Friends of the Earth) 2. Hampshire: 'Three new incinerators have been built in Hampshire .... The majority of local authorities in the county are now failing to meet their recycling targets and recycling rates are stagnating across the county .... incinerators are now absorbing virtually all residual waste in the region' ...(Ref. 'Briefing - Up in Smoke', September 2007,Friends of the Earth) 3. Kent: 'Failure of furnace linings at the Waste to Energy Incinerator at Allington meant another plant shut down of the burning process, a mountain of rotting rubbish and a plague of flies for local residents.' (Ref. 'Incinerator Failure', June 2008, Liberal Democrats, Kent) The case in favour of MBT with AD is very clear, and includes the following points, not applicable to incineration (not exhaustive): MBT with AD technology has the least greenhouse gas impact (Ref. 'Greenhouse Gas Balances of Waste Management Scenarios', Report for the Greater London Authority by Eunomia, January 2008) MBT with AD does not produce toxic fly ash. MBT with AD is easier to install, facilities can be small and have less visual impact. These facilities can operate on short term contracts and crucially, have a flexible hall system that can meet variable waste requirements. MBT with AD can produce compost from source segregated kitchen waste to PAS 100 standard agricultural use. AD produces biogas: 'Anaerobic digestion breaks down organic matter, such as animal manure and food waste to produce biogas - a renewable energy source for heat, power and transport. Using anaerobic digestion also keeps organic waste out of landfill, which in turn cuts greenhouse gas emissions.' ('Defra welcomes recommendations of anaerobic digestion task group', July 2009, Defra) If G.C.C. implements incineration technology to deal with waste treatment they would be setting up a destructive legacy that would be detrimental to the planet (climate change), detrimental to the health of the people and detrimental to their finances. G.C.C. 'must not burn our future'.

17. Officer Response.

Comments noted. Dealing with each in turn. In terms of site size, the site options consultation included sites in all Gloucestershire Districts/Boroughs other than Cheltenham (where no suitable sites were found to be available). Ten of these sites were located inside Zone C and 3 outside. Views were invited on whether a combination of sites should be used. At this stage it has not been determined whether treatment of residual waste will take place on one large site or several smaller sites. The Council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a

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single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the County. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. The advantages and disadvantages would be investigated further during the procurement process. In terms of technology, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. With regard to CO2 emissions, waste management and the move away from landfill are driven by the Climate Change agenda. Climate change is a wider issue which the development of this solution can positively contribute. Carbon footprint is assessed as part of the life cycle analysis (WRATE0 at ISDS. GCC will ask for details of emissions management as well as any other foreseeable environmental impacts and plans to mitigate these will be requested during competitive dialogue. DEFRA have commented on this issue directly by stating: "The plans (for Gloucestershire) could also make an important contribution to the drive to tackle climate change by delivering estimated net carbon savings of 33,800 tonnes in 2020, compared to the current arrangements, or 64,700 tonnes if the final technology solution includes combined heat and power." With regard to health, PPS10, states that 'modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health'. GCC view health impacts and safety as important and this will be explored at the ISOS, ISDS and competitive dialogue stages. The bidders must demonstrate their ability to deliver facilities that comply with legislation and policy. As with 'monitoring service', it will be discussed during ISDS and competitive dialogue. Various method statements will require Bidders to outline their approach to legislation and compliance. This is standard for any contract/procurement which the council is involved in. This is also an opportunity for the council to explore the concept or not just complying with regulations and emission controls, but also the potential to excel these, and understand the implications and benefits of bettering the proposed solutions. APC (fly-ash) residues would be regulated by the Environment Agency through the Environmental Permitting regime. In terms of incineration acting as a disincentive to recycling, GCC will be procuring a solution that aligns with its recycling and composting objectives. Tonnages are based on achieving 60% recycling capacity and are reviewed regularly using the most up to date figures. 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. In terms of MBT, the Council as explained is currently technology neutral.

Number 201 Type IND Name Frank Skinner Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

It makes sense to be near the M5, major cities and major areas of growth.

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester	X		
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

No. 7 is a dead area already.

4. Officer Response.

Not certain of the precise meaning of this comment on Site 7. However, the site has not been taken forward into the Publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the Publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals

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for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Disagree

6. Please give a reason for your answer to Question 5.

I believe a change of government next year will alter the whole plan, so therefore we should NOT take these extensions into account.

6. Officer Response.

Comment noted. The Government's intention to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I do not support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

Forest of Dean and the Cotswolds are both areas of Outstanding Natural Beauty, and should be disregarded for the purposes of the waste management.

8. Officer Response.

Comment noted. For clarity, most of the Forest of Dean is not a designated AONB. With respect to facilities in the AONB, the WCS does avoid the allocation of strategic sites in the AONB but recognises the potential need for appropriate local facilities serving local waste management needs. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester		X	
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

Unless you build such a plant at the bottom of the quarry, such a location would be a disaster for the local environment.

10. Officer Response.

It is not clear which area or quarry the respondent is referring to. The nearest former quarry at Foss Cross which includes the consultation site has mainly been restored to agriculture by landfilling and therefore there is no obvious quarry bottom. With regards to environmental effects, environmental pollutants including noise, dust and odour are matters that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any 'sensitive receptors'. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily

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ameliorated through the use of appropriate planning conditions. With regard to pollution it should be noted that planning and pollution control regimes are separate but complimentary. Pollution control is concerned with preventing pollution whilst planning controls the development and use of land. Waste planning authorities are expected to work on the assumption that the relevant pollution control regime will be properly applied and enforced. Please also see response to Q8 in relation to sites outside of Zone C.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I do not support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

Already explained

12. Officer Response.

See previous response

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No

13. Officer Response.

Noted

14. Do you have any comments on the Executive Summary?

I am disappointed that they have not specifically excluded the possibility of incineration. Most developed countries worldwide have abandoned incinertion as there are now much better ways of dealing with waste.

14. Officer Response.

Comment noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. It should also be noted that incineration has not 'been abandoned' by most developed countries. In 2007 Germany incinerated 35% of its waste, Belgium 34%, the Netherlands 38% and Sweden 47% (source: Eurostat 2007)

15. Do you have any comments on Section 1?

I am also disappointed that the document is not shorter and easier to read. Your website says "Plain English Approved" but this document is clearly not.

15. Officer Response.

Comment noted. The consultation document has been drafted with plain English in mind and made as easy to read as possible. However it was difficult to avoid the use of jargon, abbreviations and acronyms altogether and waste is a technical subject. The Publication WCS will be worded as simply as possible with a broad audience in mind.

Number 314 Type IND Name A R Slatter Organisation not applicable/not provided

17. Do you have any comments on Section 3?

This is to register my objection to the above site, in particular - Area 'C'. Area C has been used by Cheltenham & District Clay Club for over thirty years. During that time this area that was part of the wartime airfield has been cleared of ' scrub', the grass brought under control & regularly mown, some 400 trees & shrubs planted. Doing this work has taken many, many hours, with a considerable expenditure for equipment. The Club has grown over time & now has 200 members plus a waiting list to join. Wildlife has also reaped the benefit of this work, green & speckled woodpeckers, fox & deer together with many other bird types can be seen on this site. Bishops Cleeve & Stoke Orchard villages have already, in my opinion, more than a fair share of tips & other waste sites. The waste comes from all over the West Country, not just Gloucestershire. It is now time for other parts of the county to shoulder the burden of a waste site. There will inevitably be an increase in heavy traffic to this site, if selected, on an already overburdened road, which is also used as a 'rat-run' by commuters. There is a vehicular weight limit on the road through Stoke Orchard. Several other sites have much better access, some adjacent to main roads/motorway, are centrally located within the county, most importantly do not have recreational activity on them ... they are vacant. As this plan is stated to be from 2011, I wanted to know why T.B.C. wanted to start on Area C, in April 2009, no answer was forthcoming. It was obvious that nobody even knew about this ... why not.

17. Officer Response.

Comments noted. Dealing with each in turn. The re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community. PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. For the Wingmoor sites, the assessment identified a potential net increase in traffic and the need for mitigation in certain locations to help increase capacity. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan.The plan period is based on the likely date of adoption which is currently 2012. The WCS will have a 15 year timeframe to 2027. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the inclusion criteria for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (Please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that this site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 120 Type IND Name Andy Smith Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

The development proposal at Easter Park is close to residential and school properties. There will be pollution and increased traffic on already busy route

2. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. Notwithstanding the above, the site has not been taken forward into the Publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X	X	
4. Javelin Park, Haresfield		X	
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence		X	
7. Land north of Railway Triangle, Gloucester		X	
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West			

4. Please give a reason for your answers to Question 3.

areas close to residential areas are unsuitable

4. Officer Response.

Comment noted. See previous response in relation to potential impact on residential areas.

Number 120 Type IND Name Andy Smith Organisation not applicable/not provided

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester		X	
2. Hurst Farm, Lydney	X		
3. Land at Lydney Industrial Estate, Lydney		X	

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

Number 249 Type OTH Name Katie Smith Organisation Elmbridge Neighbourhood

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

I think that the sites outside Zone C that you suggest are also good potential sites

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

As a local resident of Elmbridge, and representing Elmbridge residents I feel I can only comment on our local area - the Railway Triangle. We feel that the Railway Triangle is highly inappropraite as a site because of the close proximity to residential areas and the fact that as a central city location the transport routes to teh site are inappropraite.

4. Officer Response.

Comments noted. The site has not been taken forward into the Publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going

Number 249 Type OTH Name Katie Smith Organisation Elmbridge Neighbourhood

forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the Publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Disagree

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

Number 406 Type IND Name Roger Smith Organisation not applicable/not provided

17. Do you have any comments on Section 3?

As a resident of Bishops Cleeve and a member of the Cheltenham 8: District Clay Club I feel I must write to make my feelings known about the proposed plan to consider further waste disposal on the land leased to our club by Tewkesbury Borough Council. Firstly I have lived in Bishops Cleeve for 22 years and witnessed firsthand the increase in heavy goods vehicles in and around our village. The drivers of these vehicles pay scant regard to the piece, tranquillity or safety of our by-roads, they now take shortcuts through the estate roads causing great disturbance to the area. We have endured this increase in traffic despite protests to the council. The situation has definitely worsened since the opening of Grundons' new plant and we now also regularly witness strange odours across the village. It must be time now for the residents of Cleeve to be afforded respite and for others in the County to 'take their turn'. I now turn to the Gun club. I have regularly attended the Clay Club since its launch, a time when the Council seemed delighted we were prepared to take this scrap of waste land and invest time and money in its reclamation. At that time, this forgotten plot consisted of mud and old air-raid shelters. During the last 30 years our club has transformed this plot into a most pleasant leisure facility for those with an interest in shooting and country pursuits. We have planted over 400 trees, levelled the ground, built earth bank surrounds, and provided modern facilities and safe car parking. We have become a haven for wild life; we even have a pair of buzzards. Some 200 members enjoy this facility and we regularly get visits from their friends and families. We actively encourage other groups to use our club grounds and we raise money for various charities. To consider this area within the development strategy to widen disposal space seems to defy logic; firstly, the ground is very small, secondly, it provides leisure pursuit and thirdly, it contributes to the environment. Any other site would fail on anyone of these criteria! Doubtlessly, people adjacent to the other proposed sites under consultation will be preparing their cases for objection - why wouldn't they? Those where no facility currently exists will be the most vocal. When they do oppose please remind them the people of Bishops Cleeve have co-existed with tipping for over 30 years and brought up their Children next to the busiest refuge centre in the County. We have endured the noise, smell and traffic of the Counties unwanted waste for well over half of my lifetime. Those who do not have a facility near them like to forget their waste once the operatives have been to collect it, after all - it's then someone else's problem. As for the Gun Club, if the consultation results in our club losing its grounds then I shall lose faith in the Councils ability to reflect the needs and desires of local people. Waste disposal is everyone's problem - not just the community of Bishops Cleeve and Cheltenham Clay club.

17. Officer Response.

Comments noted. Dealing with each in turn. PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. For the Wingmoor Farm sites, the assessment showed that there would be a net increase in traffic and some potential issues of capacity which could require mitigation e.g. junction improvements. Any strategic site allocation made in the publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the 'inclusion criteria' for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management

Number 406 Type IND Name Roger Smith Organisation not applicable/not provided

purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that his site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS national policy and any other material considerations.

Number 59 Type IND Name Roger Snipe Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

I write to object to any proposal to use land in Stoke Orchard for the expansion of waste disposal facilities for Gloucestershire. The reasons for my disagreement with the proposal are as follows: The nearby villages are already affected by the noise and damage of heavy traffic and this will be significantly worsened by a further' development which can be avoided. Road safety will be further compromised in the area by additional heavy transport travelling along local roads, particularly with regard to local schools and the young children and parents that use them. Part of the existing premises are used by Cheltenham Clay Club and it offers excellent facilities to members and visitors, there is no equivalent facility in the area. The clubs has been in existence for many years, has an excellent record. I am a member of the Fire Service and find the rest and relaxation that the Club provides on my days off really helps my Work/ life Balance. The site is not central to the county and will require the transport of material on journeys of many miles, hardly a sensible practice. I feel there must be several more appropriate sites for you to use and would ask you to consider those first.

4. Officer Response.

Comments noted. Dealing with each point in turn. PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. This should include matters such as lorry routeing and road safety issues. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the 'inclusion criteria' for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from Tewkesbury Borough Council with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of Tewkesbury Borough Council have not been asked to make a decision on this land. As the County Council will be moving towards Publication of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that his site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 425 Type IND Name Jo Sobey Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I'm not sure/I don't know

2. Please give a reason for your answer to Question 1.

Sites should minimise transportation requirements. It is not clear to me that this is the case, though it probably is. Also without knowing what treatment method is to be used it is not possible to respond to any questions adequately. Personal view: Incineration is used extensively in Europe and sites are in cities - why can't we do the same?

2. Officer Response.

Comment noted. One of the reasons for focusing on Zone C is that this will allow most of Gloucestershire's waste which is generated at Gloucester and Cheltenham, to be treated close to source thereby helping to reduce trip movements. The traffic movements associated with the waste from further afield will be reduced through the use of bulking and transfer facilities. With regard to technology, the Council is currently technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. The role played by incineration in a number of European countries is acknowledged.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X		X
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester	X		
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

can only comment on sites I know and with limited knowledge. Plus it depends on treatment method used

4. Officer Response.

Support for sites (Wingmoor Farm East & West, Javelin Park, Land north of Railway Triangle) noted. With regard to Site 7, Land North of Railway Triangle, the site has not been taken forward into the publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health

Number 425 Type IND Name Jo Sobey Organisation not applicable/not provided

care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

6. Please give a reason for your answer to Question 5.

strongly against RSS as is stands Plus it depends on treatment method used

6. Officer Response.

Comment noted. In terms of technology, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. Notwithstanding this the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

Plus it depends on treatment method used

8. Officer Response.

Comment noted. Please see response to Q6.

Number 425 Type IND Name Jo Sobey Organisation not applicable/not provided

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

I can only comment on sites I know Plus it depends on treatment method used

10. Officer Response.

Noted. Please see response to Q6. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

Multiple local sites sounds good

12. Officer Response.

Support noted.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

no

13. Officer Response.

Noted.

14. Do you have any comments on the Executive Summary?

difficult to respond to any questions as the treatment method is not addressed This should be a policy decision made first before locations

Number 425 Type IND Name Jo Sobey Organisation not applicable/not provided

14. Officer Response.

Comment noted. Please see response to Q6.

15. Do you have any comments on Section 1?

as 14

15. Officer Response.

See previous response.

16. Do you have any comments on Section 2?

as 14

16. Officer Response.

See response to Q14.

17. Do you have any comments on Section 3?

as 14

17. Officer Response.

See previous response.

18. Do you have any comments on Section 4?

as 14

18. Officer Response.

Comment noted. See response to Q14.

19. Do you have any comments on the Sustainability Appraisal reports?

as 14

19. Officer Response.

Comment noted. See response to Q14.

20. Do you have any comments on the Habitat Regulations report?

as 14

20. Officer Response.

Comment noted. See response to Q14.

Number 390 Type BUS Name Brett Spiller Organisation New Earth Solutions Group

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

The preferred locational corridor, referred to as 'Zone C', presents a useful starting point taking into consideration the constraints posed by the Cotswold AONB, Wye Valley AONB, Malvern Hills AONB and areas prone to severe flood risk, The latter should not be regarded as an absolute constraint, but any site will need to be viewed in the context of the SFRA and its relative sequential merits. It is also evident that, in contrast to much of the Areas of Outstanding Natural Beauty, the topography of Zone C is relatively flat and therefore more likely to support a suitable building platform. Unsurprisingly the topography of the area has influenced past infrastructure provision. The principal highway network forms the spine of Zone C and as such affords good accessibility to the main centres of population.

2. Officer Response.

Support noted. All sites identified in the site options consultation paper were subjected to a Strategic Flood Risk Assessment (SFRA). None of the sites are within a flood risk area. Notwithstanding this, any proposal of more than 1 hectare in size will need be supported by a site-specific Flood Risk Assessment (FRA).

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

No site specific comments at this stage - although NESG reserve the right to make detailed comments at submission stage.

4. Officer Response.

Comment noted.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

6. Please give a reason for your answer to Question 5.

No site specific comments at this stage - although NESG reserve the right to make detailed comments at submission stage.

6. Officer Response.

Comment noted. Notably, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the Government's intention to abolish the RSS casts doubt

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over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the Waste Core Strategy.

7. Do you support the identification of sites outside Zone C?

I'm not sure/I don't know

8. Please give a reason for your answer to Question 7.

Whilst NESG readily acknowledges the need for flexibility, it is evident that there are other sites within Zone C that are suitable for a strategic waste management facility - see (Q13) below. It is respectfully suggested that these sites be considered in this context.

8. Officer Response.

The WPA notes the support for flexibility and the comment indicating support for a one site solution at Javelin Park. Noted also is the support for the NESG operated site at Sharpness Docks. This site is in Zone C and it does have a number of advantages in land use planning terms. However, the primary reason that it was not included in the WCS Site Option consultation was that the landowner, British Waterways, clearly indicated that they did not wish it to be considered for allocation. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

No site specific comments at this stage - although NESG reserve the right to make detailed comments at submission stage.

10. Officer Response.

Comment noted.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

The site would lie within the preferred locational corridor, referred to as 'Zone C', and is circa 16km of C Gloucester (as the crow flies). The operational facility is bounded by potential expansion land, which would allow for the assembly of a site of more than 2ha (a criteria referred to in para 3.16 of the consultation document). For the avoidance of doubt, I herewith attach a site location plan showing the operational site and prospective expansion land. The site enjoys excellent highway links to the A38 and M5 optimising accessibility to and from the main centres of population. This serves to minimise travel times and distances, as well as negating potential amenity impacts associated with HGV movements. The port also affords the opportunity to receive waste and remove recovered recyclates and end products by water or rail. The existing operational facility treats source segregated (green, kitchen, card) waste. The incoming waste is shredded, screened, sanitised and stabilised to produce compost for agricultural application. A planning condition restricts the throughput capacity to 48,000 tonnes per annum, albeit the design capacity is greater. New Earth Solutions envisage the continuation of treatment of source segregated waste at Sharpness Docks for the foreseeable future. However, the existing buildings and associated external hard standing could accommodate a range of additional complimentary technologies alongside those

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processing source segregated material. Such technologies might include MBT and I or small scale decentralised energy generation (i.e. not a large scale mass burn incinerator). It is notable that much of the adjoining land formed part of a 'preferred site', identified under Policy 4 (Schedule 1, site 5) of the adopted Gloucestershire Waste Local Plan. Policy was not saved beyond 2007, but it is important to stress that this was owing to the outdated reference to the BPEO (superseded in PPS1 0). The merits of this location in potentially meeting Gloucestershire's medium to long term residual waste management needs still stand. NESG consider that the site meets the requirements set out in both the emerging RSS and PPS10 (including appendix E).

13. Officer Response.

The Sharpness Docks area did have some technical assessments carried out on it and two other parcels of land were submitted as part of the call for sites exercise. However, British Waterways (the landowners of the Sharpness Docks area - Site 547) indicated that the land was not available for residual waste management treatment and of the other parcels submitted one was in conflict with the landowners wishes and the other did not fulfil the inclusion criteria outlined in Technical Evidence Paper WCS-N. For details of site 547 assessments please see Technical Evidence Paper WCS-N and its appendix C.89 and for the other parcels please refer to Technical Evidence Paper WCS-O (pages 30 and 31). In response to the consultation, British Waterways has confirmed that they do not want any of their land at Sharpness Docks considered as a potential site at this time.

Number 248 Type IND Name Sally Sprason Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Zone C sites have good links to the motorway

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X		X
4. Javelin Park, Haresfield		X	
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

Nastend farm is unsuitable as it is in close proximity to local houses and buildings. The A419 is a busy stretch of road and the additional transport that the waste facility would bring increases the congestion.

4. Officer Response.

Comments noted. With regard to Site 8, the site has not been taken forward into the Publication WCS because although the County Council is the landowner, following discussions with the County Council's Waste Disposal Authority (WDA) it would appear that there is significant uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore, the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the Publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

Suitable Not Suitable Don't Know

Number 248 Type IND Name Sally Sprason Organisation not applicable/not provided

1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

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1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

We support the approach of focusing the search for strategic residual municipal waste sites on the area defined as Zone C. The approach of focusing the search for strategic residual household waste sites on the area defined as Zone C is considered consistent with Government waste planning policy guidance and regional and local waste planning policies.

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
2. Areas A, B & C at Wingmoor Farm West	X		
4. Javelin Park, Haresfield	X		
10. The Park, Wingmoor Farm West			

4. Please give a reason for your answers to Question 3.

Site 2: Wingmoor Farm West The assessments provided for Site 2 (Wingmoor Farm West), in the Waste Core Strategy - Site Options Consultation document and associated supporting documentation including the Sustainability Appraisal (SA) reports, are considered confusing and imprecise. Whilst it is appreciated why the grouping of three separate but closely located parcels of land have been put together, this does make it difficult to gain a true understanding of the actual assessment associated with each of the three different parcels of land (A, B and C) . A number of the assessments will vary depending on the specific parcel of land being considered yet the adoption of such an approach is not always apparent from the published assessment results. As a result Cory expects that the responses the County receive on the suitability of Site 2 will be on the basis of a single site as opposed to each individual parcel of land. This concern is highlighted by the wording of Question 3, which does not give the respondent a choice to separately assess each of the three areas of land identified within Site 2. Area B at Wingmoor Farm West Area 8 at Wingmoor Farm West is considered suitable on account that: It provides sufficient land area to provide a strategic waste management facility; It is designated as an area of search for strategic waste facilities in the Waste Local Plan; It is not located within ecological, landscape or floodplain designated areas; It forms land with extant consent for waste use activities; It is located within 16km of the main sources of waste arisings in the County; It is located close to the Strategic Road Network (A435); It is remote from residential dwellings and sensitive receptors; It is situated dose to existing waste management facilities and infrastructure and as such offers a potential integrated waste management solution. With respect to the assessments presented in the Waste Core Strategy - Site Options Consultation document and associated supporting information we would like to take this opportunity to identify a few aspects which we feel should be amended / given some further consideration in any future assessment of Area 8 at the Wing moor Farm West site. The land area the area of the site is 3.6ha, as set out in our letter dated 18 May 2009 and Drawing WM070, as opposed to the 3.2ha figure contained in the description of the site on page 32 of the Waste Core Strategy - Site Options Consultation document. Existing infrastructure on this site could be re-located or re-configured to accommodate a strategic waste management facility and would not be considered an impediment to the allocation of this site within the Waste Core Strategy. In terms of landscape impacts, although the assessment conclusion that the site has a 'high landscape suitability' is accepted it is not clear whether this assessment had regard to the consented landform that will result from the restored landfill, which would assist in the further screening of any development on this site. With respect to traffic impacts it is unclear as to the Highways Authority's view on the Grundon Traffic Assessment (TA) referred to on page 33 of the Waste Core Strategy - Site Options Consultation document. It would be expected that the traffic assessment related to Area B of Site 2 to be based upon the Highway's Authority assessment as opposed to a view

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expressed within a TA relating to a different site. As mentioned above the Stage 2 SA results for Area B of Site 2 are unclear since this assessment appears, from the published information, to have been undertaken having consideration to Site 2 as a whole as opposed to each of the three individual areas of land. In consequence concern is raised as to the level of accuracy that can be attached to this assessment, which in turn may impact the results presented. Having regard to the identified minor negative results within the Stage 2 SA results it is suggested that consideration should be given to the distance of sensitive receptors from Area B specifically i.e. over 650m as opposed to 250m. The Health Protection Authority's report entitled 'The Impact on Health of Emissions to Air from Municipal Waste Incinerators' dated September 2009 which concludes that ... Whilst it is not possible to rule out adverse health effects from modern, well regulated municipal waste incinerators with complete certainty, any potential damage to the health of those living close-by is likely to be very small, if detectable. should also be given due consideration. The landscape assessment referenced within the Stage 2 SA results (Objective 9) appears to contradict the assessment results for Area B referenced on page 33 of the Waste Core strategy - Site Options Consultation documentation. The assessment for Site 10 The Park which under the assessments contained within Appendix C had the same landscape assessment conclusions as Area B provided a positive Stage 2 SA result rating and it is considered this should be applied to Area B of the Wing moor Farm West site. Finally, it is unclear as to how the assessment of impact on geo-diversity contained within the Stage 2 SA results (Objective 12) has been derived. Area B is located within an area of land consented for landfill development. On the basis that such a use has been assessed and approved by both the planning authority and Environment Agency Cory considers that development at the site would not have a potentially negative impact on the County's geo-diversity. Area A at Winqmoor Farm West Area A at Wing moor Farm West is considered suitable in an ancillary manner related to the development of either Site 2 (Area B) or Site 10. It is not however considered a suitable stand alone site for a strategic waste management facility in light of the relative advantages of Site 2 (Area B) and Site 10, which are located in close proximity to this site. For example, Area A has more limited access, is located closer to sensitive receptors, constitutes undeveloped land within the Green Belt and there has been a previous planning refusal for waste development. In consequence, Area A at Wingmoor Farm West is considered to have the potential to be used in conjunction with Site 2 (Area B) or Site 10 as opposed to being a site for the development of a specific strategic waste management facility. For example, this land could be used to accommodate outputs from a strategic waste facility and / or provide storage for waste and or recovered products. Site 4: Javelin Park. Haresfield In light that the land area for Site 4 is in split ownership it may be appropriate in any future consideration of this site, and consistent with the assessment of other sites where different parcels of land have been identified, if separate assessments associated with each parcel of land were provided. The Javelin Park site is considered suitable on account that: It provides sufficient land area to provide a strategic waste management facility; It is designated as a preferred site for strategic waste facilities in the Waste Local Plan; It is not covered by ecological, landscape or historic planning policy or land use designations; It is centrally located in the County and is within 16km of the main sources of waste arisings in the County; It has good accessibility, being located within 500m of the M5 motorway; It is remote from sensitive receptors with the exception of a single residential dwelling and adjoining businesses; It forms land with extant consent for industrial/commercial development. The published assessments associated with the Stage 2 SA results for Objectives 9 and 10 both appear to relate to the AONB but the related results vary. As such it would be considered of benefit if additional explanation for the results could be provided in any future consideration of this site. Site 10: The Park The Park site is considered suitable on account that: It provides sufficient land area to provide a strategic waste management facility; It is designated as a preferred site for strategic waste facilities in the Waste local Plan; It is not located within ecological, landscape or floodplain designated areas; It forms land with an established industrial use with extant consent for waste use activities; It is located within 16km of the main sources of waste arisings in the County; It is located close to the Strategic Road Network (A435); It is remote from residential dwellings and sensitive receptors; It is situated close to existing waste management facilities and infrastructure and as such offers a potential integrated waste management solution. With respect to the assessments presented in the Waste Core Strategy - Site Options Consultation document and associated supporting information we would like to take this opportunity to identify a few aspects which we feel should be amended / given some further consideration in any future assessment of The Park site. In terms of the site description the site is currently occupied by four larger hanger type industrial buildings as well as two smaller industrial units. The area of the site is 7 Aha, as set out in our letter dated 18 May 2009 and Drawing WM070, as opposed to the 4.3ha figure contained in the description of the site on page 48 of the Waste Core Strategy - Site Options Consultation document. In terms of landscape impacts, although the assessment conclusion that the site has a 'high landscape suitability' is accepted it is not clear whether this assessment had regard to

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the consented landform that will result from the restored landfill, or the landscape assessment work undertaken in support of earlier waste proposals at this site. With respect to traffic impacts it is unclear as to the Highways Authority's view on the Grundon TA referred to on page 48 of the Waste Core Strategy - Site Options Consultation document. It would be expected that the traffic assessment related to The Park site is based upon the Highway's Authority assessment as opposed to a view expressed within a TA relating to a different site. Having regard to the identified minor negative results within the Stage 2 SA results it is suggested that consideration should be given to the distance of sensitive receptors from The Park as being over 450m as opposed to 250m. The Health Protection Authority's report entitled 'The Impact on Health of Emissions to Air from Municipal Waste Incinerators' dated September 2009 which concludes that ... Whilst it is not possible to rule out adverse health effects from modern, well regulated municipal waste incinerators with complete certainty, any potential damage to the health of those living close-by is likely to be very small, if detectable.should also be given due consideration. Finally, it is unclear as to how the assessment of impact on geo-diversity contained within the Stage 2 SA results (Objective 12) has been derived. The Park site is a well established industrial estate with predominately hard standing and has consents for waste uses. On this basis Cory considers that development at the site would not have a potentially negative impact on the County's geo-diversity.

4. Officer Response.

Comments noted. Dealing with each in turn. Wingmoor Farm West - The WPA do not consider that the SA Reports are confusing and imprecise, but it is accepted that they are complex and do need to be considered carefully and thoroughly and a cursory reading will not prove useful. We understand the point that grouping the three parcels A, B and C at Wingmoor Farm West (in the Stage 2 SA Report) could make it difficult for some respondents to gauge the specific sustainability benefits or dis-benefits of these individual parcels of land. However, the SA Reports (both Stage 1 and 2) are not a stand alone documents, and need to be read in conjunction with the WCS Site Options consultation document itself and all the Technical Evidence Papers which themselves have been informed by archaeological, ecological, highways and landscape appraisals as well as the Strategic Flood Risk Assessment. In relation to Wingmoor Farm West, the plan on Page 32 & 33 of the Site Options consultation document shows the extent of the different areas A, B & C very clearly and gives a description of their size and current land use. In looking at the responses to the consultation to date, respondents have either been very specific about the area or parcel they are interested/concerned about e.g. we have had a high volume on Wingmoor Farm West Area C from Gun Club members, or have commented on the whole of Wingmoor Farm (Wingmoor East, Wingmoor West and The Park) as a generic area of waste management in Bishops Cleeve. We would contend that this has very little to do with the structure of the SA Reports, rather it is to do with specific local interests and community action groups who do not necessarily differentiate between sites and areas, but just focus on the perceived extent of waste management activities in their vicinity / neighbourhood. The Stage 2 SA Report and the site schedule on pages 32 and 33 of the Site Options consultation document do: - Make very clear where the assessment is referring to the larger area and not the 3 parcels. - Appropriately differentiate between the Areas A, B & C e.g. on matters such as landscape suitability, flood risk, and landowner deliverability. The comments on the suitability of Area B at Wingmoor Farm West including the potential reconfiguration/re-location of existing infrastructure are noted. The comment concerning the size of the site is noted. The measurements in the documents were based upon those calculated by the Council's GIS system rather than any submitted as part of the Call for Sites exercise. The WPA does not consider the difference in size of 0.4ha significant enough to have any bearing upon the consultation document. However, this will be checked should the site be taken forward into the Publication WCS. With regard to landscape impact, the assessment of the site as having high landscape suitability refers to the site as it is currently, but the Waste Planning Authority do recognise the fact that consented landform resulting from restored landfill (nearby) could further screen the site. With regard to the Highways Assessment and its use in the Stage 2 SA Report, it is correct that this assessment has considered Site 2 as a whole and not the individual A, B & C parcels. This is a logical approach because (critically) they all use the same access. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. In reference to the comments about Area B Wingmoor Farm West and the distances to sensitive receptors, the WPA accept that this area is generally very good in this respect. However, we would still contend that recreational use e.g. a gun range / club could be a sensitive receptor. We are aware of the Health Protection Authority Report (September 2009) and the Waste Planning Authority agrees with its conclusions. The difference in the Stage 2 SA results and the site schedule on page 33 of the consultation paper are noted. The SA should read 'high landscape suitability' not 'low-

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medium suitability'. In the Stage 2 SA, Site 2 has been given a single negative score in terms of the impact on geodiversity (Objective 12) due to the fact that it is within 500m of a Regionally Important Geological and Geomorphological Site (RIGS) - Wingmoor Farm Pit -a temporary RIGS at the Grundon site where clay excavations are along the strike of the strata. The Waste Planning Authority does not regard this as a significant constraint. With regard to Area A - Wingmoor Farm West, the Waste Planning Authority note the comments about the potential planning constraints such as access, use of undeveloped land etc. It is also noted that this site was originally proposed by Cory Environmental through the 'Call for Sites' process as a strategic site and not as land ancillary to a strategic site (Drawing WM070). Javelin Park - Comments on the suitability of Site 4 -Javelin Park are noted. The Park - Comments on the suitability of Site 10 -The Park are noted. In terms of distances to sensitive receptors, the WPA accept that this site is very good in this respect. The WPA would still contend that nearby recreational use e.g. a gun range / club could be a sensitive receptor. With regard to the area included on the plan on Page 48 of the WCS Site Options document, this is the same as Cory's submitted drawing WM070. We accept that there has been a discrepancy with the measurements of the Park area and clearly if this site progresses to the WCS Publication stage these detailed matters will have to be clarified. In relation to the Landscape Assessment for Site 10, the consideration of the site as having high landscape suitability refers to the site as it is currently, but the Waste Planning Authority do recognise the fact that consented landform resulting from restored landfill (nearby) could further screen the site. The initial Highways Assessment for Site 10 -The Park is based on a number of factors. Clearly a recently submitted TA on a nearby site utilising the same road network is going to inform the assessment to some degree. Further more detailed Highways work is likely to be undertaken in the next few months prior to the WCS Publication. In reference to Area B Wingmoor Farm West and distances to sensitive receptors, the WPA accepts that this site is generally very good in this respect. We would still contend that recreational use e.g. a gun range / club could be a sensitive receptor. We are aware of the Health Protection Authority Report (September 2009) and the Waste Planning Authority agrees with its conclusions. Site 10 has been given a single negative score in terms of the impact on geodiversity (Objective 12) due to the fact that it is within 500m of a Regionally Important Geological and Geomorphological Site (RIGS) - Wingmoor Farm Pit -a temporary RIGS at the Grundon site where clay excavations are along the strike of the strata. The Waste Planning Authority does not regard this as a significant constraint.

6. Please give a reason for your answer to Question 5.

On account of the uncertainty over the status of the Regional Spatial Strategy and the exact locations, scope and nature of any urban extension we consider it premature to provide comment upon the suitability of such potential developments to accommodate strategic residual household waste sites. It is envisaged that as part of the County's assessment of potential strategic residual household waste sites all potential urban extension areas should have been I should be assessed in the same manner as any other location within the County.

6. Officer Response.

Comment noted. The potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

8. Please give a reason for your answer to Question 7.

It is considered reasonable for all sites, even if located outside of Zone C, to be given due regard as a contingency in the event that no suitable sites within Zone C can be identified. However, it is considered that preference towards the siting of strategic waste facilities within Zone C should be maintained. In the event that few potential sites within Zone C remain following future assessment it is suggested that a more detailed appraisal of other sites within Zone C should then be undertaken. The use of the phrase 'main sites' within question 7 is confusing and could potentially be seen as implying that this document is also assessing non strategic residual household waste sites. In accordance with the process of identifying and assessing sites for this report, the site options subject of this consultation are understood to relate solely to the identification of strategic residual household waste facilities. We consider it important that the report is clear that the locations identified outside of Zone C still only relate to potential residual household waste sites that could accommodate more than 50,000 tpa of waste throughput. In this

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respect we find the comment that "The sites could potentially be used for waste treatment if needed (probably relatively small in scale) ... " made in paragraph 3.40 of the Waste Core Strategy - Site Options Consultation document misleading.

8. Officer Response.

Comments noted. Support for the principle of identifying contingency sites is noted as is support for focusing on Zone C. The consultation was undertaken on the basis of all sites being suitable for strategic residual waste facilities. On balance having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the publication Waste Core Strategy (WCS). It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the Waste Core Strategy (WCS) national policy and any other material considerations.

10. Please give a reason for your answers to Question 9.

We consider it important that the report is clear that the locations identified outside of Zone C still relate to potential residual household waste sites that could accommodate more than 50,000 tonnes of waste per annum.

10. Officer Response.

Comment noted. All of the 13 sites identified in the site options consultation paper are larger than 2 hectares in size and capable of accommodating 50,000 tonnes of waste per annum. The sites outside Zone C are intended to be relatively small in scale i.e. 50,000 tonnes per annum as opposed to 150,000 tonnes. Whilst the Council's preferred strategy is to provide strategic waste management facilities within Zone C, there is likely to be a role for sites outside this area e.g. smaller scale provision or supporting infrastructure e.g. waste transfer. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. These sites will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the sites forward as allocations at this stage does not mean that the sites are unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

12. Please give a reason for your answer to Question 11.

Having regard to the focus of the Waste Core Strategy - Site Options Consultation document being related to the identification of strategic residual household waste management sites our comments are restricted to the consideration of using a combination of such strategic sites. The possibility of using a combination of strategic sites either within and I or outside of Zone C would be dependent on a range of environmental, economic and social factors. In the absence of specific details relating to the development of actual sites for defined uses it is, however, very difficult and is therefore considered premature to assess and therefore indicate support or otherwise to the approach of using a combination of sites. For illustrative purposes we have sought to set out below a brief high level outline of some of the environmental, economic and social factors that would need to be considered when assessing the concept of using a combination of sites. The use of more than one strategic site may potentially reduce the environmental impacts associated with the development of a single site, although this may be partly dependent upon the type of technology adopted. For example, the scale of a stack associated with an energy from waste or thermal treatment facility may not be significantly different for different capacities. Equally, however, the development of two or more strategic sites could have a greater cumulative environmental impact than the development of a single site, although this again would be dependent upon the specific sites and facilities proposed. Economically a number of cost savings could result from the development of a single site compared with the development of two or more strategic sites. This has regard to the higher build and operational costs that would be expected to be associated with the development of multiple sites. Transport efficiencies could be realised through the use of a combination of strategic sites, although this would be dependant upon the collection and disposal points and whether any re- handling of materials between facilities were proposed. From a social perspective the development of a combination of strategic sites could reduce the social impacts associated with a particular development

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on a specific site. However, as with consideration of the environmental impacts the cumulative impacts associated with the development and operation of two or more strategic sites could be greater.

12. Officer Response.

Comments noted. The environmental concerns, particularly those associated with thermal treatment and scales of plant will be assessed through the HRA study. Considerations of costs and economies of scale are a matter for the WDA to consider when awarding contracts and as such, are beyond the scope of the WCS. The council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the county. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. The advantages and disadvantages would be investigated further during procurement process.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

In accordance with the focus of the Waste Core Strategy - Site Options Consultation document the sites that Cory have put forward for consideration within this process have related to locations considered suitable as strategic sites for the treatment of residual household waste. From a review of the Waste Core Strategy - Site Options Consultation document and its associated supporting information we understand that the site at Sudmeadow, Hempsted has been discounted primarily on flood risk grounds. As you are aware Cory consider the Environment Agency's flood risk maps, which formed the basis of the SFRA Level assessments, to be out of date. Further discussions with the Environment Agency have been entered into by Cory to understand the mechanism to update the flood risk maps for the area to account for the current topography of the area. Our understanding from the Environment Agency is that this process to update the plans will take some time. On this basis and having regard to recent proposals for development of Gloucester City Football Club involving schemes to improve and protect the local area from flooding we request that in the event that insufficient strategic sites are available in Zone C further consideration is given to the Sudmeadow, Hempsted site. We would also wish to clarify the status of the Level 2 SFRA's undertaken as part of the assessment of sites. Our understanding from the Environment Agency is that this exercise was based upon desk based information and did not involve site specific modelling of flood risk as is generally undertaken as part of a Level 2 SFRA.

13. Officer Response.

Comments noted. In their consultation response, the EA have stated "the December 2008 initial site assessment document is not a Level 2 SFRA. We request that the referencing be amended in the document and any future documentation to avoid confusion." Any reference made to this work in the Publication WCS will be duly amended. An earlier correspondence was received from the EA in relation to Hempsted: "The County Council has adopted a robust approach to flood risk in its work on the WCS to date. For the current work on consideration of strategic waste allocations the Planning Authority has undertaken a cross-referencing exercise of potential sites against the findings of the Level 1 SFRA. Sites have been scored for their suitability in flood risk terms. The Planning Authority has taken the approach of discounting sites that are indicated to be in flood risk areas. This is a robust approach to strategic planning that is in accordance with the Sequential Approach and key principles of PPS25, including the risk-based, precautionary approach. We strongly support this approach. We anticipate that on the basis of this approach, the Planning Authority will not include Hempsted as a potential strategic waste site due to its location in a flood risk area. The Level 1 SFRA is the main basis for this process. Whilst *[the operator] has raised questions as to the detail of the Level 1 SFRA in this location (due to historic land raising), this does not alter the appropriateness of the Planning Authority's approach. The Level 1 SFRA is a strategic document meant primarily for strategic planning purposes. Therefore it represents the appropriate level of evidence on which to base a sequential approach to strategic allocations where these are located outside of flood risk areas. We would note that even if the land raising that has taken place alters the floodplain at Hempsted, we consider it is likely that the area will still generally be located

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within the 1 in 100 year floodplain, possibly the functional floodplain (zone 3b). We consider it would be for the developer to undertake more detailed work/submit further evidence to 'disprove' the Level 1 SFRA and our flood zone maps. Indeed should *[the operator] wish for Hempsted to be considered as a strategic waste site as indicated, then he may wish to undertake a Level 2 SFRA for the location. Our view is that as the Planning Authority has discounted sites in flood risk locations according to the Level 1 SFRA (and as this is a robust approach in line with National Planning Policy) it would be for a developer to provide further evidence to attempt consideration of their site. Even if such evidence is submitted by a developer, the Planning Authority may chose not to accept this evidence, regardless of the outcome of a further/more detailed studies by developers. This is because the approach already taken is considered robust and defendable and they may wish not to alter this approach for one site as it would mean other sites could do likewise. The Planning Authority may also consider this process to be unnecessary if it has already identified sufficient strategic sites located outside areas at risk of flooding. Furthermore the Planning Authority will have its own time constraints for finalising potential sites. Ultimately these are decisions for the Planning Authority, but we have made it clear that we support their approach and would assist them in defending this approach at Examination In Public of the WCS if required. To conclude this section, the approach of the Planning Authority to consider only sites not located in flood risk areas as per the Level 1 SFRA is a robust and adequate approach in accordance with PPS 25. In our view if there are sufficient sites outside the floodplain then there is no need or obligation for the Planning Authority to consider other sites even if developers undertake further work to attempt to 'disprove' the Level 1 SFRA and our flood zone maps. Finally in relation to Hempsted, we suspect it is unlikely that the area is located out of the 1 in 100 year floodplain regardless of land raising that has occurred." *The name of the company's representative has been replaced by [the operator]

14. Do you have any comments on the Executive Summary?

Cory considers it would be appropriate for the executive summary section of the report to clearly state that the focus of the report is on identifying strategic sites primarily for residual household wastes. Although this point is made in Section 3 of the report there appears to be no mention of the strategic nature of the sites that have been put forward and thus identified in the report within the summary section of the document.

14. Officer Response.

Comment noted. The executive summary states the following, 'As an outcome of the Preferred Options consultation and in particular following strong advice from GOSW, it has been decided that the WCS will now include strategic sites suitable for the treatment of residual municipal waste'.

15. Do you have any comments on Section 1?

Cory considers it would be appropriate for the introductory section of the report to clearly state that the focus of the report is on identifying strategic sites primarily for residual household wastes. Although this point is made in Section 3 of the report there appears to be no mention of the strategic nature of the sites that have been put forward and thus identified in the report within the introductory part of the document. Within Figure 1 on page 11 of the report Cory would welcome clarification as to the likely scope of the Waste Site Allocation DPD. For example, would this relate to the identification of non strategic residual household waste sites as well as sites suitable for the treatment of other waste streams?

15. Officer Response.

Paragraph 1.12 of the site options consultation paper clearly states that the 'The purpose of this document is therefore to consider which sites should come forward for the treatment of residual municipal waste. As stated underneath Figure 1, the preparation of optional Development Plan Documents (DPDs) such as a Waste Site Allocations DPD will depend on the progress and content of the WCS.

16. Do you have any comments on Section 2?

No comment.

16. Officer Response.

noted

17. Do you have any comments on Section 3?

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Prior to the provision of more detailed comments / specific responses to the questions posed in the questionnaire Cory wish to set out an overall comment that relates to a number of our subsequent responses. The focus of the Waste Core Strategy - Site Options Consultation document is set out in paragraph 3.3, which clearly establishes the document being related to potential sites suitable for treating residual household waste at a strategic level. We feel it important for this basis to be made clear throughout the document. The sites put forward under the call for sites in 2008/09 and the sites assessed in this consultation document are on the basis of their suitability for treating residual household waste with a capacity greater than 50,000 tpa. In consequence this document and supporting information should only be considered material with respect to the assessment of such waste proposals. On the basis of the comments made in paragraph 3.14 that the Council's search for sites was related to 'strategic sites' could it be clarified that this document and supporting information would only be considered material in the assessment of such strategic waste proposals. We would also wish clarification as to the status of the Level 2 SFRA's undertaken as part of the assessment of sites. As mentioned above our understanding from the Environment Agency is that this exercise was based upon desk based information and did not involve site specific modelling of flood risk as is generally undertaken as part of a Level 2 SFRA. A number of comments on the specific site assessments contained with Chapter 3 have been included in relation to our answers provided in our response to Questions 3 and 4.

17. Officer Response.

Comments noted. As stated at paragraph 3.3 the site options consultation was concerned with identifying strategic sites at least 2 hectares in size and able to handle at least 50,000 tonnes of waste per year. Strategic site allocations made in the Publication WCS will be made on this basis. The Publication WCS will include criteria-based policy to allow for smaller-scale speculative proposals to come forward. It is acknowledged that the SFRA work carried out in support of the site options consultation does not constitute a full Level 2 SFRA. Any future reference made to this work will be revised accordingly.

18. Do you have any comments on Section 4?

In paragraph 4.6 reference is given to Appendix 4 of the Waste Core Strategy - Site Options Consultation document. The highlighted note at the start of this Appendix appears to state that the table is for illustrative purposes only. As such it is confusing as to the likely deliverability and implementation framework that is expected to be used to form the basis of the delivery strategy for the Waste Core Strategy.

18. Officer Response.

Comment noted. Appendix is an illustrative example insofar as it only includes two policies, neither of which are finalised. Clearly when the policies of the Publication WCS have been finalised they will be included in a more detailed version of Appendix 4. At this stage, comments are sought on the overall merits of the approach that is proposed to be taken.

19. Do you have any comments on the Sustainability Appraisal reports?

A number of comments on the specific site assessments contained with the Stage 2 SA report have been included in relation to our answers provided in our response to Questions 3 and 4. With respect to the Stage 2 SA report assessments we understand from paragraph 3.7 of the Stage 2 SA report that the large medium and small scale facilities do not relate to the same 3 sizes of development as adopted for the landscape appraisals set out in Technical Appendix C. Within the technical Appendix C we understand the sizing criteria to be based upon: Small = building height up to 20m, stack height up to 40m and land take of 2000-6000m2 Medium = building height up to 30m, stack height up to 60m and land take of 3000 - 7000m2 Large = building height up to 40m, stack height up to 80m and land take of 4000-9000m2 Whereas according to paragraph 3.7 of the Stage 2 SA report the assessment criteria for each site is based upon the following size criteria: Small = Capacity up to 50,000 tpa of waste Medium = Capacity of 50,000 to 100,000 tpa of waste Large = Capacity over 100,000 tpa of waste We consider this difference in definition of large medium and small to be confusing. Furthermore, the inclusion of the criteria relating to small facilities being below the strategic level is contrary to the call for sites process, identified focus of the Waste Core Strategy - Site Options Consultation document and indeed paragraph 3.14 of the Waste Core Strategy - Site Options Consultation document that states that the Council's search for sites was related to 'strategic sites'. This inaccuracy should be addressed and clarified in the future development of the Waste Core Strategy. The non-technical summary of the Stage 2 SA report at paragraph 11 states that ... the GCC Minerals & Waste

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Planning Policy Team Carried out a comprehensive exercise to identify all sites in the County with some potential for waste use ... Although as identified in Site Selection Methodology the initial desk top long list included a potential list of available waste sites the call for sites in 2008/09 and assessment of the sites in this consultation document was related to strategic household sites. This point should be addressed and clarified in the future development of the Waste Core Strategy. The non-technical summary of the Stage 2 SA report at paragraph 11 states that As all of the 13 waste site options are within 250m of sensitive receptors ... This statement is considered inaccurate on the basis that Site 2: Area B of Wingmoor Farm West is 650m from sensitive receptors and Site 10: The Park is some 4S0m from sensitive receptors.

19. Officer Response.

Comments noted. The small, medium and large scale facilities mentioned at Para 3.7 of the Stage 2 SA Report do broadly relate to the definitions in Appendix C of Technical Evidence Paper N. The former is based on indicative waste throughputs, the latter (see below) is a specific facility range used by Atkins in their independent landscape assessment of the sites. Small = building height up to 20m, stack height up to 40m and land take of 2000 - 6000 square metres. Medium = building height up to 30m, stack height up to 60m and land take of 3000 - 7000 square metres. Large = building height up to 40m, stack height up to 80m and land take of 4000 - 9000 square metres. It should be remembered that these assessments have been undertaken at a broad level (appropriate to this stage of the Core Strategy) and in the context of a lack of specifics on size and technology. This is due to the Council being in procurement and adopting a technology neutral position. The WCS is looking to allocate 'strategic sites'. The 'small' scale facilities mentioned at Para 3.7 of the Stage 2 SA Report could handle 50,000 tpa (which is the threshold used to define a strategic site). In reference to Area B Wingmoor Farm West and The Park and the respective distances to sensitive receptors, the WPA accept that these sites are generally very good in this respect. We would still contend that recreational use e.g. a gun range / club could be a sensitive receptor.

20. Do you have any comments on the Habitat Regulations report?

No comment.

20. Officer Response.

Noted.

Number 436 Type IND Name I Stegg Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	

4. Please give a reason for your answers to Question 3.

I am writing to object to any further use of 'The Wingmoor Sites' for the treatment of residual municipal waste. my reasons are as follows: It would be irresponsible for the County to put all its eggs in one basket. An unforseen circumstance could negate a singel waste disposal site. There is a logic to having diversification with smaller units spread around the county. Transport costs, hazard and road nuisance would be minimised by locating treatment sites closer to the likely larger sources of waste within the county. Wingmoor already seems to be the sole recipient of certain hazardous wastes for the South West!! which I believe to be strategically wrong. The Wingmoor facility is already a major intrusion in the local area close to a large population. It should be 'wound down' not expanded. Social facilities should not be removed in the favour of waste. It is time for other facilities to be created around Gloucestershire to take their fair share of municipal waste.

4. Officer Response.

Comments noted. In terms of the number of sites, at this stage it is not known whether residual treatment of municipal waste will be in the form of one large site, or several smaller sites. The council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the county. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. The advantages and disadvantages would be investigated further during procurement process. In terms of proximity to the largest sources of waste in the County, the Wingmoor Farm sites are close to Cheltenham, which, along with Gloucester is where most of Gloucestershire's waste is generated. With regard to the importation of hazardous waste, the areas of Wingmoor Farm (East and West) currently used for landfill do not form part of this consultation and the operational status of these sites is also beyond the scope of the consultation. It is assumed that 'social facilities' refers to the gun club. Assuming this is the case, Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the inclusion criteria for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that this site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as

Number 436 Type IND Name I Stegg Organisation not applicable/not provided

an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 431 Type IND Name O Stephens Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I am writing to protest at proposed further development of Wingmoor Sites. Instead of spoiling more greenbelt and land close to housing destroying the environment it would be better and fairer that each county should provide their own suitable sites for waste and not allow one county to be responsible - the waste is highly toxic and living in vicinity of Bishops Cleeve its quite obvious when wind is in right direction the smell and dust in the air is from the site - also the problem of flies at certain times is noticeable. I note that the technology to be used at any of these sites has not been decided and would have thought that should be first concern before anything else and bearing in mind most of these sites will be adjacent to housing and farm animals on agricultural land (the health of the population and the food that we eat should be a major consideration - of things go wrong the cost to the council for health and safety could be astronomical!!! And the tax payers would not expect to pay out for this sort of problem having protested against these proposals - the Human Rights at E.U may get involved! I trust nothing will be done until local population are 100% satisfied.

17. Officer Response.

Comments noted. Dealing with each in turn. Whilst it is acknowledged that the Green Belt should generally be protected, PPS10, emphasises that local authorities should 'recognise the particular locational needs of some types of waste management facilities when defining detailed green belt boundaries and, in determining planning applications'. In line with PPS10 companion guidance, should any sites within the Green Belt be specifically allocated within the WCS, it will need to be clearly indicated that they are for waste management purposes only. The site options consultation paper identifies 13 sites, 10 in Zone C, 3 outside Zone C. These were drawn from an initial long-list of 329 sites. With the exception of Cheltenham Borough (where no sites were available) the 13 sites consisted of sites from each of the Gloucestershire Districts. The questionnaire invited views on the suitability of these sites including whether a combination of sites from within and outside Zone C should be pursued. At the current time it is not known whether Gloucestershire's residual waste will be managed on one large site or a number of smaller sites. The council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the county. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. The advantages and disadvantages would be investigated further during the procurement process. In terms of 'toxic waste' the site options consultation relates to the provision of facilities to manage residual municipal (mainly household) waste. This is not toxic in nature. The consultation does not relate to the existing hazardous landfill operation run by Grundons. Odour and dust are matters that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any 'sensitive receptors'. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning conditions. Odour and dust are also considerations for the Environment Agency in deciding to grant or refuse a waste management license through the Environmental Permitting Regulations. In terms of technology, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. With

Number 431 Type IND Name O Stephens Organisation not applicable/not provided

regard to health, PPS10, states that 'modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health'. Furthermore, the detailed consideration of a waste process and the implications, if any, for human health is the responsibility of the pollution control authorities. PPS10 also states that, where concerns about health are raised, waste planning authorities should avoid carrying out their own detailed assessments, rather they should ensure, through drawing from Government advice and research and consultation with the relevant health authorities and agencies, that they have any advice on implications for health.'The WPA duly sought the advice from the PCT/NHS through the site options consultation.

Number 177 Type IND Name Cole Steven Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Policy pps10. Not floodplain or anob.

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X		X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre	X		
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester	X		
8. Nastend Farm, Stroudwater Business Park	X		
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

Some knowledge of area and reviewed site data

4. Officer Response.

Comment noted.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

6. Please give a reason for your answer to Question 5.

local facility more sustainable

6. Officer Response.

Support noted. The WCS has a role to play in ensuring all new development is underpinned by appropriate waste management infrastructure (e.g. recycling facilities). The site options consultation paper however focuses on identifying a site or sites suitable for accommodating a strategic waste management facility and there has been no interest from either waste operators or the developers leading the urban extensions in providing this type of facility as part of the development. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead their waste management requirements will be addressed through the general policies and requirements of the WCS.

Number 177 Type IND Name Cole Steven Organisation not applicable/not provided

7. Do you support the identification of sites outside Zone C?

I do not support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

good main road access . Existing facility - well run

10. Officer Response.

Support for Foss Cross site noted. On balance however, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. This site will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I do not support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

It is important that there is good road access for HGVs

12. Officer Response.

Comment noted - PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan.

14. Do you have any comments on the Executive Summary?

Logical approach

14. Officer Response.

Support noted.

Number 421 Type IND Name Faith Stevens Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	

4. Please give a reason for your answers to Question 3.

I am writing to protest most strongly to the various proposals for the future use at Wingmoor. I have written to you before and it seems little notice is being taken of all the protests at the future use of the site. We do not want any further developments on this site in fact we would like it closed and finished for ever - there are so many bad issues here. I cannot attend your meeting because I'm disabled and 86 years - but I want only the best and safest conditions for the population of Bishops Cleeve. I came here over 40 years ago and I hope everything can be done to revert back to those clean-air days. It is vital that we protect our future generation from this evil waste. There are other alternatives please make use of them and do not be bullied into a compromise - they do not keep to the rules.

4. Officer Response.

Comments noted. The re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community. The areas of Wingmoor Farm (East and West) currently used for landfill do not form part of this consultation and the operational status of these sites is also beyond the scope of the consultation.

Number 118 Type IND Name Mary Clare Stewart Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Mainly good access to major road network. The railway triangle gloucester may impinge on emergency vehicles to Gloucester Royal Hospital. Access difficult at times presently.

2. Officer Response.

Support for Zone C noted. All 13 sites identified in the site options consultation paper were subjected to an initial assessment in highway terms and considered acceptable. Any site taken forward into the Publication WCS will be supported by development criteria including those relating to transport and highways. Should a planning application come forward on any site this would need to be supported by a Transport Assessment (TA) with any necessary highway mitigation agreed through planning condition or legal agreement. With specific regard to land north of the railway triangle, the site has not been taken forward into the publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X		
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works	X		

Number 118 Type IND Name Mary Clare Stewart Organisation not applicable/not provided

10. The Park, Wingmoor Farm West ☐ ☐ ☐

4. Please give a reason for your answers to Question 3.

Sites 1, 2 and 10 Wingmoor Farm is an area already undertaking waste management. Monitoring of health issues now taking place. Site 9 Netheridge - Do they already have mechanical biological treatment expertise? Site 6 - New infrastructure will be required. Nearness of aquifer fed surface floodwater site Site 4 - concern that it is located in the City Centre Site 8 Nastend Farm- significant negative effect likely on all tables

4. Officer Response.

Support for Wingmoor Farm sites noted. The re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community. Support for Site 9, Netheridge is noted however the site has not been taken forward into the Publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore, the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Support for Site 6, Land at Moreton Valence is noted. It has been decided to take this site forward as a strategic site allocation within the Publication WCS. The Council is not however convinced of the need to extend the site as suggested by the landowner in response to the site options consultation in 2009. The area allocated in the Publication WCS is therefore the original site identified in the site options consultation in October 2009 and not the proposed site extension put forward in response to that consultation. This will allow for future operations to be more readily controlled than would be the case with a more extensive site. Site 4, Javelin Park is not located in the City Centre it is on the southern edge of Gloucester. The site has been taken forward into the Publication WCS because there is support from the landowners which greatly increases the prospects of delivery, the site is located close to Gloucester one of the county's main urban areas, the site enjoys good access to the strategic road network (SRN) is not at risk of flooding, has no other significant nearby environmental constraints and there are relatively few sensitive uses located nearby. Furthermore whilst the site is not currently in waste management use, it is previously developed (brownfield) land. Site 8, Nastend Farm comment noted. The site has not been taken forward into the publication WCS because although the County Council is the landowner, following discussions with the County Council's Waste Disposal Authority (WDA) it would appear that there is significant uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore, the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). It should be noted that the fact that sites are not going forward into the WCS does not make them unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Disagree

6. Please give a reason for your answer to Question 5.

There are already waste facillities adjacent to both urban areas. Can the existing sites be developed? There is an outcry against more housing unless it is affordable - will further sites be required?

6. Officer Response.

Comment noted. The site options consultation paper identified a number of existing waste facilities, highlighting their potential for accommodating a strategic waste management facility. The use of existing waste facilities is consistent with advice contained in PPS10, subject to careful consideration of cumulative impact. The urban extensions were included in the site options consultation paper as an alternative to the 10 specific sites identified in Zone C. They present the opportunity for waste management to be incorporated into the design and layout of the developments from an early stage. However, the site options consultation has revealed little

Number 118 Type IND Name Mary Clare Stewart Organisation not applicable/not provided

interest from either the waste industry or the developers of the urban extensions in developing a waste treatment facility or facilities as part of those proposals. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed in the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

If further sites are required they should be identified at an early stage. The three are on major road networks.

8. Officer Response.

Comments noted. Good transport networks are clearly an important consideration. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney	X		
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

Site 1 - though in AONB it is to be sited on an existing industrial estate Site 2 - should be suitable for management/transfer or treatment as planned Site 3 - there seem to be major concerns

10. Officer Response.

Support for Sites 1a and 2a noted. With regard to Site 3a, it is unclear what is meant by 'major concerns'. The site schedule for Site 3a flags up a number of issues including proximity to the Severn Estuary SAC/SPA/Ramsar but this is not an insurmountable issue. Flood risk would need to be considered further if a proposal were to come forward as the access road to the site is within the floodplain. On balance, however having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. These sites will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the sites forward as allocations at this stage does not mean that the sites are unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

I feel there may be a requirement to go outside the M5 corridor if planning permission becomes a problem. With any of the sites identified as preferred sites. It could be costly for the Council if they cannot meet Government targets.

Number 118 Type IND Name Mary Clare Stewart Organisation not applicable/not provided

12. Officer Response.

Comment noted. The Publication WCS identifies four strategic allocations within Zone C. Other sites may come forward where there is market demand and these would be considered on their merits having regard to relevant policy criteria.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No

13. Officer Response.

Noted

14. Do you have any comments on the Executive Summary?

It is set out clearly with sufficient information to explain the necessity of the proposal and Government policy (maps and charts always help).

14. Officer Response.

Support noted.

15. Do you have any comments on Section 1?

As above

15. Officer Response.

See previous response.

16. Do you have any comments on Section 2?

The Council should use the most effective advanced systems suitable for the relevant materials that cannot be recycled. Is there any way of turning waste into useable sources of heat? The waste leaflet explains the technology well.

16. Officer Response.

The potential for recovering energy from waste is acknowledged. A separate evidence paper on combined heat and power potential has been produced in support of the Publication WCS. Whilst electricity can be exported to the national grid, for heat to be used there needs to be a continuous demand for heat nearby for example industry and housing. The development criteria for the strategic site allocations highlights the degree of potential for CHP at each site. Support for waste leaflet noted.

17. Do you have any comments on Section 3?

It appears that the 10 sites are the most appropriate especially if 329 sites were originally investigated.

17. Officer Response.

Support noted.

18. Do you have any comments on Section 4?

The Council seem to have a robust framework in place for monitoring the programme from now on.

18. Officer Response.

Support noted.

19. Do you have any comments on the Sustainability Appraisal reports?

Summary of findings table easy to read. Conclusions and recommendations set out well as is the monitoring of the sustainability effects.

19. Officer Response.

Number 118 Type IND Name Mary Clare Stewart Organisation not applicable/not provided

Support noted.

20. Do you have any comments on the Habitat Regulations report?

As above.

20. Officer Response.

Support noted.

Number 186 Type IND Name Rachelle Strauss Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

I'm not sure of the benefits / problems to looking at sites within this zone or what might be the benefits / problems of looking outside this zone because I do not know what waste disposal technologies you are considering.

2. Officer Response.

Comment noted. It is essential that the WCS provides a clear steer on the preferred location for new strategic waste management facilities. 'Zone C' has been identified as the preferred location for a number of reasons including the fact that it avoids the floodplain and Cotswold Area of Outstanding Natural Beauty, is consistent with Government Policy (PPS10), the Regional Waste Strategy and reflects the fact that most of the County's waste is produced at Gloucester and Cheltenham. With regard to technology, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch		X	
4. Javelin Park, Haresfield		X	
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence		X	
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works		X	
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

It would depend on the method of disposal used as to whether or not these sites are suitable. Without that information I cannot make a choice and therefore I deem all sites to be unsuitable until I have further information.

4. Officer Response.

Comment noted. See previous response to Question 2.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Disagree

Number 186 Type IND Name Rachelle Strauss Organisation not applicable/not provided

6. Please give a reason for your answer to Question 5.

I don't understand enough to be able to make an informed decision. Without knowing WHICH methods of waste disposal you are considering, I cannot give my view; so I am against all sites until I have further information.

6. Officer Response.

Comment noted. See previous response in relation to type of method. In relation to the RSS, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I do not support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

I don't understand enough to be able to make an informed decision. Without knowing WHICH methods of waste disposal you are considering, I cannot give my support to any site

8. Officer Response.

Comment noted. See previous response in relation to method.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester		X	
2. Hurst Farm, Lydney		X	
3. Land at Lydney Industrial Estate, Lydney		X	

10. Please give a reason for your answers to Question 9.

I don't understand enough to be able to make an informed decision. Without knowing WHICH methods of waste disposal you are considering, I cannot give my support of any of these sites as a suitable site for waste disposal.

10. Officer Response.

Comment noted. See previous response in relation to method.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I do not support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

I don't understand enough to be able to make an informed decision. Without knowing WHICH methods of waste disposal you are considering, I cannot give my view.

12. Officer Response.

Comment noted. See previous response in relation to method.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

I cannot give details of any sites until I know which methods of waste disposal you are considering.

13. Officer Response.

Number 186 Type IND Name Rachelle Strauss Organisation not applicable/not provided

Comment noted. See previous response in relation to method.

14. Do you have any comments on the Executive Summary?

Your focus must be on minimising waste through better education of how to reuse, recycle and compost and by providing better facilities. A 60% target is nowhere near high enough - you should be going for at least 90% which IS achievable. You should also allow people to give and take items at the household recycling sites instead of making it an offence to take things; this would show a good support of reuse. You have asked for our say, as residents, but we don't know what we are having our say about; other than possible sites. How can we give our opinions about suitability of these sites if you do not tell us what waste disposal method you are considering? This Waste Consultation should be done again with more openness, honesty and integrity from yourselves so that residents of Gloucestershire know what you are proposing.

14. Officer Response.

Comments noted. The Council places great importance on waste reduction, re-use and recycling/composting. The Publication WCS will set out policies accordingly. However there will always be an element of 'residual' waste that cannot be re-used or recycled and must be treated. The Councils target of at least 60% by 2020 is 10% higher than the national target over the same period. Allowing people to take items at HRCs has implications for health and safety and is not considered appropriate. See previous response in relation to method/technology.

15. Do you have any comments on Section 1?

Your focus must be on minimising waste through better education of how to reuse, recycle and compost and by providing better facilities. A 60% target is nowhere near high enough - you should be going for at least 90% which IS achievable. You should also allow people to give and take items at the household recycling sites instead of making it an offence to take things; this would show a good support of reuse. You have asked for our say, as residents, but we don't know what we are having our say about; other than possible sites. How can we give our opinions about suitability of these sites if you do not tell us what waste disposal method you are considering? This Waste Consultation should be done again with more openness, honesty and integrity from yourselves so that residents of Gloucestershire know what you are proposing.

15. Officer Response.

See previous response to Question 14.

16. Do you have any comments on Section 2?

Your focus must be on minimising waste through better education of how to reuse, recycle and compost and by providing better facilities. A 60% target is nowhere near high enough - you should be going for at least 90% which IS achievable. You should also allow people to give and take items at the household recycling sites instead of making it an offence to take things; this would show a good support of reuse. You have asked for our say, as residents, but we don't know what we are having our say about; other than possible sites. How can we give our opinions about suitability of these sites if you do not tell us what waste disposal method you are considering? This Waste Consultation should be done again with more openness, honesty and integrity from yourselves so that residents of Gloucestershire know what you are proposing.

16. Officer Response.

See previous response to Question 14.

17. Do you have any comments on Section 3?

Your focus must be on minimising waste through better education of how to reuse, recycle and compost and by providing better facilities. A 60% target is nowhere near high enough - you should be going for at least 90% which IS achievable. You should also allow people to give and take items at the household recycling sites instead of making it an offence to take things; this would show a good support of reuse. You have asked for our say, as residents, but we don't know what we are having our say about; other than possible sites. How can we give our opinions about suitability of these sites if you do not tell us what waste disposal method you are

Number 186 Type IND Name Rachelle Strauss Organisation not applicable/not provided

considering? This Waste Consultation should be done again with more openness, honesty and integrity from yourselves so that residents of Gloucestershire know what you are proposing.

17. Officer Response.

See previous response to Question 14.

18. Do you have any comments on Section 4?

Your focus must be on minimising waste through better education of how to reuse, recycle and compost and by providing better facilities. A 60% target is nowhere near high enough - you should be going for at least 90% which IS achievable. You should also allow people to give and take items at the household recycling sites instead of making it an offence to take things; this would show a good support of reuse. You have asked for our say, as residents, but we don't know what we are having our say about; other than possible sites. How can we give our opinions about suitability of these sites if you do not tell us what waste disposal method you are considering? This Waste Consultation should be done again with more openness, honesty and integrity from yourselves so that residents of Gloucestershire know what you are proposing.

18. Officer Response.

See previous response to Question 14.

19. Do you have any comments on the Sustainability Appraisal reports?

Your focus must be on minimising waste through better education of how to reuse, recycle and compost and by providing better facilities. A 60% target is nowhere near high enough - you should be going for at least 90% which IS achievable. You should also allow people to give and take items at the household recycling sites instead of making it an offence to take things; this would show a good support of reuse. You have asked for our say, as residents, but we don't know what we are having our say about; other than possible sites. How can we give our opinions about suitability of these sites if you do not tell us what waste disposal method you are considering? This Waste Consultation should be done again with more openness, honesty and integrity from yourselves so that residents of Gloucestershire know what you are proposing.

19. Officer Response.

See previous response to Question 14.

20. Do you have any comments on the Habitat Regulations report?

Your focus must be on minimising waste through better education of how to reuse, recycle and compost and by providing better facilities. A 60% target is nowhere near high enough - you should be going for at least 90% which IS achievable. You should also allow people to give and take items at the household recycling sites instead of making it an offence to take things; this would show a good support of reuse. You have asked for our say, as residents, but we don't know what we are having our say about; other than possible sites. How can we give our opinions about suitability of these sites if you do not tell us what waste disposal method you are considering? This Waste Consultation should be done again with more openness, honesty and integrity from yourselves so that residents of Gloucestershire know what you are proposing.

20. Officer Response.

See previous response to Question 14.

Number 95 Type IND Name John Stretton Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Despite Government opinions to the contrary, waste sites should not be located within urban areas. Zone C has a large part in flood zones and in liable to flooding already. The RSS has not been approved and could be thrown out in a change of government.

2. Officer Response.

Comment noted. RSSs will potentially be abolished by national government . Importantly however, the evidence that informed the preparation of the RSS may still be considered a material consideration. Furthermore, despite the potential abolition of the RSS, local authorities are expected to continue to progress their own development plan documents including waste plans, with enough land being provided for waste management facilities to support the sustainable management of waste. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. With regard to flood risk, whilst some parts of Zone C are in the floodplain, this area avoids the largest expanse of floodplain which is located in the western part of the County. None of the potential sites identified in the consultation paper are located in a defined floodplain. Notwithstanding this, any planning application on a site more than 1 hectare in size would need to be supported by a site-specific Flood Risk Assessment (FRA) with any necessary mitigation measures identified as appropriate.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch		X	
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

There is substantial residential development planned for Ashchurch/Northway and as such could not fit in with the Easter Park Site. The map being used for Easter

Number 95 Type IND Name John Stretton Organisation not applicable/not provided

Park is out of date, as it does not show the culvert running under the site of the Saxon Park housing estate, which is closer than houses appear on your map. This estate is largely occupied by young families with young children and contains a sizeable green play area for these young children. A waste plant would exacerbate flooding problems; potentially worsen total traffic on A46. Additionally overload already inadequate services, and lead to depression of house prices in an already depressed area.

4. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. The map used in the site options consultation is based on the latest available from Ordnance Survey. The Council is aware of the culvert running through the site. In terms of flood risk, the site is in Flood Zone 1 and therefore at low-risk of flooding. It is important to remember that the site has existing planning permission for employment development and the principle of development in this location has therefore been accepted. Any proposal of more than 1 hectare would need to be supported by a detailed Flood Risk Assessment (FRA). In terms of traffic impact the initial highway assessment carried out for this site suggests that a waste facility could actually lead to a net reduction in traffic, compared with that which could be generated if the existing planning permission for employment development were to be implemented. In terms of house prices, the effect of development, waste related or otherwise, on house prices, is outside the scope of the planning system. Notwithstanding the above, the site has not been taken forward into the Publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Disagree

6. Please give a reason for your answer to Question 5.

see question 2

6. Officer Response.

See previous response to Question 2.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

Suitable Not Suitable Don't Know

Number 95 Type IND Name John Stretton Organisation not applicable/not provided

1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

more isolated site.

10. Officer Response.

Support noted.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I'm not sure/I don't know

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No

13. Officer Response.

Noted.

14. Do you have any comments on the Executive Summary?

No

14. Officer Response.

Noted.

15. Do you have any comments on Section 1?

No

15. Officer Response.

Noted.

16. Do you have any comments on Section 2?

No

16. Officer Response.

Noted.

17. Do you have any comments on Section 3?

Shold avoid urban and flood plain areas.

17. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also

Number 95 Type IND Name John Stretton Organisation not applicable/not provided

consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. In terms of floodplain, the focus on Zone C ensures that the largest area of floodplain in the western part of the county is avoided. Whilst there are some flood risk areas within Zone C, the 10 sites identified avoid these. Any proposal of more than 1 hectare in size would in any case need to be supported by a site-specific Flood Risk Assessment (FRA).

18. Do you have any comments on Section 4?

No

18. Officer Response.

Noted.

19. Do you have any comments on the Sustainability Appraisal reports?

No

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

No

20. Officer Response.

Noted.

Number 156 Type IND Name Jocelyn Stuart-Grumbar Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I write to object to the use of all 13 of the sites listed for possible waste treatment in Gloucestershire on the grounds that: Any of these sites could be used for incineration, which I oppose Incineration creates fly ash residue which is toxic and dangerous. This has to be transported and buried, creating an unacceptable risk for local residents. I understand that incineration contracts would be for at least 24 years: this fails to take account of the changing nature and projected decline in volume of waste and of the certain emergence of new waste-processing technologies. Mechanical Biological Treatment, including Anaerobic Digestion, is a proven alternative that better satisfies environmental criteria and is a much more acceptable application of taxpayers' resources. Large incinerators elsewhere in the country are now recognised to have been a mistake. I would ask that fullest possible consideration is given to the very real grounds for objection to the current proposals.

17. Officer Response.

With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 443 Type DC Name Barbara Tait Organisation Stroud District Council

4. Please give a reason for your answers to Question 3.

****Additional comments received on additional Moreton Valence consultation**** In response to the site specific mini-consultation on the waste Core Strategy at Moreton Valence, please find below the officer level response. While this consultation relates to the specific site extension at Moreton Valence, our original concerns remain in that it is difficult to comment on specific sites when the overall broad strategy is unclear. We remain concerned as to whether the proposed strategy can deliver a low carbon response to waste management. Since our response to the Preferred Strategy consultation we have had no opportunity or invitation to discuss the County Councils approach to the Waste Core Strategy. We have not received any feedback on our comments and the apparent failure to understand or acknowledge the intrinsic relationship between land use, waste treatment solutions and collection regimes. This 'mini consultation' continues to seek views on a site that could come forward for the treatment of residual municipal waste. However by not recognising the unique characteristics of different technological solutions the strategy ignores the fact that different technologies need a certain size, distribution, type of site and potentially collection methodology. There is a potential range of impacts that might arise depending upon the nature and scale of specific waste management facilities that might be accommodated on this extended site. This is at odds with the site assessment and site schedule accompanying the 'mini consultation' that seek to define potential impact without reference to the range of possible technologies that could be employed on the site. On one level, given the overriding need to reduce carbon emissions, the District Council could support the extended Moreton Valence site given its location within the District and the ability to deal with MSW collected here in the District. However the exclusion of any mention of technology that may be specific to this site or the need to accommodate possible ancillary infrastructure (for example a heat main) remains a key weakness. The Council strongly supports a strategy based on a decentralised approach which increases local resilience both in terms of the collection system, localised disposal and local energy production. This approach needs to be integrated with existing or proposed land uses that benefit from the co location of mutually supportive land uses. A low carbon local strategy could create the need for a network of smaller waste management facilities close to arising, on industrial sites or PDL Despite this site potentially according with some of these aspirations, in view of the lack of clarity about the future intended use, we cannot currently support the proposal. We have looked at the site schedule and site assessment documents accompanying the mini consultation and this decision is supported by the following comments:
1. There are discrepancies between the site schedule and the site assessment (Appendix C.88: Site 546) is so far as. the site schedule refers to a level 2 SFRA having been carried out. We are unaware of a level 2 SFRA in this part of the District and consider this statement misleading. The flooding data provided in the site assessment is clearly based on a level 1 SFRA. This shows flood zone 1 but where there are recorded instances of flooding on adjacent properties Flood zone 1 appears low risk but the area is low lying and criss-crossed by ditches and drains. This could indicate surface water and drainage risks requiring more investigation and assessment. 2. The new Landscape and Visual Impact Assessment section of the Site Assessment remains unchanged and does not reflect the material change arising from the proposed extension which takes in farmland. It does not reflect the new or greater potential scale of uses and buildings on a larger site. This is relevant on such a potential strategic waste site. The detailed assessment refers to a range of potential impacts from low to high. Under Environmental and other constraints in the site schedule the landscape impact is said to be medium suitability (without any commentary). Yet this is a much bigger site as extended and with even greater potential to adversely impact the landscape. This assessment is clearly misleading to the reader. The broad description does not indicate the land area of extension in relation to the original site to the reader. A map showing the extension beyond the original site would also assist. The Council has taken a view that greenfield buffers should be left to the motorway. This assists in keeping a clear rural perception as you travel along the motorway. Significant development to the edge, coupled with other developments (such as Downtons) in the locality may change this perception and the landscape character from one of sporadic development within a rural location to one of a more urban based character. The landscape section assessment is thus flawed.
3. The site assessment refers to the study area being within an existing light industrial setting with an irregular L shaped site with a grassed earth bund. This description has not been updated to take account of the proposed extension which takes in agricultural land and separates the existing bunding from the M5 motorway. The commentary to the baseline landscape character and features appears not to have been altered by the proposed extension. This is both misleading and factually imprecise. These flaws are continued in the next section where it states the existing nature of the site is a detracting feature in the surrounding landscape and the existing bund to the east provides some mitigation, however itself is out of keeping with the flat landscape character of the wider area. There is no

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commentary provided as to the potential greater adverse impact of extending the uses and bund into open farmland and closer to the M5. The landscape impact should be re-assessed in the light of the potential intensification of the scale and nature of uses on the extended site. 4. On the site assessment, under Environmental and other constraints, highways and sensitive receptors both refer to residential property and residences. However no account appears to have been taken of the recently approved extension to the site for Gypsies and Travelling Showpeople to the north of this extended site. Furthermore another potential site to meet future GTAA requirements could be prejudiced by this proposal. The term residence or residential property is misleading to the reader and does not take account of the recognised social and cultural diversity including gypsies and travelling showpeople. The 250m buffer referred to is only a rule of thumb and does not adequately take account of the different impacts which could arise from specific technologies and uses that may result in odour, noise or particulate matter. These should be assessed together with the cumulative impact of these uses in association with the motorway use for example. The sustainability appraisal does not explore this and only visual impacts are considered in the site assessment. 5.Under Environmental and other constraints, highways impact ranges from neutral to a net increase. There is no commentary on the likely size or numbers of vehicle using the site or impact on the shared access or the potential of greater use with an extended site. The site assessment refers to a range of impacts and these are related to sustainability issues. The conclusion is that the site has concerns from a transport perspective and may require significant mitigation. The site is also recognised as having 'limited potential' for rail or water based transport. This understates the position. In reality there is no potential for rail or water borne transport connections and the relationship to walking and cycling routes is also very limited. Therefore there is extremely limited capacity for sustainable transport to the site. This assessment is not reflected in the site schedule. 6. This highway stance should also be reviewed given recent evidence in respect of requirements for the extended gypsy site to the north. That proposal required a number of highway improvements to take account of caravan use. This proposal should consider the in-combination impacts with the gypsy site and the different scale of vehicles and frequency using the proposed extended waste management site. Highway requirements could significantly impact on the deliverability of this site. It is considered that the impact should be properly reviewed given the possible range and scale of uses. 7. The camping and caravan facility at Gables Farm to the south and west of the site has an important role in our local tourism. The Council has encouraged the owners to expand the operation to 60 pitches and to apply for a grant to achieve Quality in Tourism awards (a nationally recognised starred rating). It would appear as perverse to potentially prejudice this growing rural enterprise (that we actively support) by expanding a potential unneighbourly activity and visually sensitive use adjacent to them. The site assessment states Gables Farm as a residence with a slight impact due to well established intervening woodland. However, it is more than a simple residence and there is no mature intervening woodland to the site clearly illustrated in the aerial photographs. The impact of an extended waste management facility on this use should be properly assessed. 8. The site assessment landscape comments refer to land which is developed and is not within or adjacent to the AONB. However, the extended site is only part developed and a greater proportion is agricultural land. The AONB and Cotswold escarpment are high sensitivity receptors and the mitigation required careful site planning to ensure any external stockpiles, plant or workings are contained within the existing site screening. This is not possible on the extended site also. The new scale, lack of intervening field to the motorway and need to go beyond the bund require a re-assessment for accuracy. It is misleading to assume there is no Impact on the AONB. Consideration of the impact on the setting of the AONB should also be undertaken.

4. Officer Response.

Comments noted please see response to Question 17. In relation to the concerns about flooding at the site any planning application submitted on the site over 1 hectare in size would require a Flood Risk Assessment to be submitted with any mitigation measures identified where appropriate. The landscape work undertaken for the site established the principal landscape issues of locating different sized waste treatment facilities on the site. The issues raised on the issue of the sites suitability in terms of landscape could be adequately dealt with at planning application stage. The existing and approved extension to the travelling showpeople/gypsy sites does not fall with the 250m buffer used for the consultations. The buffer used was taken from the Statement of Community Involvement for a major planning application which a strategic waste management facility would be. Where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning conditions. A full Transport Assessment will need to accompany any proposal for development. The TA should include a full assessment of the site access and routes to connect to the M5 at Junctions 12 and 13, and

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beyond to the wider principal road network. Contributions towards both maintenance and junction improvements along the transport routes to and from the site may be required. In particular improvements are likely to junction 12 to the M5 and on the more immediate principal road network such as the A38 and its junction with the B4008. The access junction from the A 38 to the site itself will likely require improvements due to its proximity to an existing junction on the western side of the A38 and an existing lay-by . It should be noted that the Highways Agency has programmed an improvement scheme for Junction 12 in 2010/11, but this does not preclude the requirement for the assessment of the impact of any development traffic upon the operation of the Junction. The owners/occupiers of Gables Farm were consulted for the initial site options consultation and the additional one. We have not received any concerns from them about the potential inclusion of the Moreton Valence Airfield site within the WCS. The impact upon amenity from a strategic waste facility would be judged at application stage but is likely that any potential impacts could be overcome using planning conditions.

17. Do you have any comments on Section 3?

In response to the formal consultation on the waste Core Strategy, please find below the formal response of Stroud District Council. This has been agreed under the authority delegated to myself as Cabinet Member for Development. While the County Council is consulting on specific sites, it is the overall broad strategy that is the basis of our objection. Critically we question whether the strategy can deliver a low carbon response to waste management. We have chosen not to comment on specific sites other than general support for the land at Stroudwater Business Park as this is the only site that we consider could deliver part of a decentralised solution for the District. The County Council's approach to the Waste Core Strategy is flawed for a number of reasons. It lacks a real vision for the County but fundamentally it fails to understand or acknowledge the intrinsic relationship between land use, waste treatment solutions and collection regimes (See Figure 2 and 3). It seeks to isolate decisions relating to land use from other material considerations that have been given legitimacy in PPS 1 and its Supplement. (See appendix) What is proposed would appear to be a strategy for the 1970's, based on an outdated knowledge of recent policy changes and failing to embrace solutions that are rapidly becoming mainstream. The WCS strategy seeks views primarily on the sites that should come forward for the treatment of residual municipal waste. However by not recognising the unique characteristics of different technological solutions the strategy ignores the fact that different technologies need a certain size, distribution, type of site and potentially collection methodology. The Strategy fails to understand the relationship to waste collection. The highly successful food waste collection trial in the Stanley's has proven that our communities will engage in food waste separation at source. This is important as it assists in the choice of waste treatment technology and location of plant and reduces processing costs (whilst also discouraging production of waste by highlighting excessive volumes). Given the overriding need to reduce carbon emissions the District Council would promote a Strategy that is overtly low Carbon in its approach. While not specifically excluding a low Carbon approach the sites proposed make this more difficult to achieve given their location and the exclusion of any mention of technology that may be specific to a site or the need to accommodate new land uses to benefit from for example a heat main. Following a low carbon local strategy would create the need for a network of smaller waste management facilities throughout the county, close to arising, on industrial sites or POL with the need for supporting uses to accommodate inert residual waste or recyclate. This requires facilities that can support an MBT, AD or new generation of efficient gasification plants, preferably close to a heat demand (or potentially gas main for the AD). Big is not necessarily beautiful and the Council strongly supports a strategy based on a decentralised approach which increases local resilience both in terms of the collection system, localised disposal and local energy production. This approach needs to be integrated with existing or proposed land uses that benefit from the co location of mutually supportive land uses. One of the key aims of the Sustainable Community Strategy includes the management of waste in a more sustainable way. Waste management is also highlighted as one of the challenges presented by economic growth. The LAA includes a number of targets relating to waste management including a reduction in the amount of residual waste per household and an increase in the amount of householder waste sent for re-use, recycling and composting. It is not accepted that the waste Core Strategy is only a land use planning document but must be consistent with the SCS, LAA and national policy. The District Council is currently preparing its Core Planning Strategy. The numbers of new homes to be found within the District are modest by comparison to other areas in the county. However, the WSC should be devised in conjunction with strategic allocations to maximise the energy benefit from a network of decentralised facilities for the benefit of new communities or employers. The Council recognises the financial constraints which are placed both upon the County Council and in turn upon the PFI process. We are also mindful that the companies which bid for the residual waste contract require a

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return on their investment. However, there has been a failure to explore the broader opportunities to attract commercial investment locally and to establish partnering arrangements where appropriate. The solution briefly described below demonstrates this point. The District Council is currently working with a local company with a consistently very high heat demand to explore potential partnership arrangements to support an energy from waste solution. In addition, within the District we have a very successful company with a proven track record of investment in renewable energy that is willing to make a substantial investment in waste infrastructure but may need the inducement of GCC funding based on the diversion of waste. This is supported by a community that expects household food waste collection to be rolled out over the next few years. We have been able to identify the pieces of the jigsaw that support a low carbon residual waste strategy for the District. We cannot ignore this potential because the market would not be able to create the partnerships, but we should pursue the opportunity with the greatest of vigour. Appendix Planning Context to support the above comments:

17. Officer Response.

Support for Site 8, Nastend Farm is noted. The site has not been taken forward into the Publication WCS because although the County Council is the landowner, following discussions with the County Council's Waste Disposal Authority (WDA) it would appear that there is significant uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore, the site is not needed in capacity terms
(i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the Publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations. It is noted that no other comments concerning the site options are made and instead the response focuses on the overall strategy. In response to the points raised the Council makes the following response. With regard to the development of a vision for the County, the Publication WCS will set out a vision for the period 2012 - 2027. This will build on previous consultation in 2006 and 2008 as well as the responses received to the site options consultation in 2009. The emerging strategy, which seeks to focus strategic waste management provision within Zone C with smaller, supporting facilities located outside Zone C is not out of date rather it is entirely in line with national and regional policy on waste. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. The importance of reducing carbon emissions is fully recognised. Addressing climate change will be a central policy tenet of the publication WCS. One of the key aims of the residual project is carbon reduction and to contribute to GCC's climate change agenda, a move away from landfill will do this in a number of ways. Less waste to landfill means that less greenhouse gases will be produced. In addition, if recyclable materials are able to be extracted using the technologies, this will replace the use of virgin materials and if energy is able to be produced by the solution, this will lessen the pressure on fossil fuels. With regard to the development of a network of small facilities, the council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin Park, whilst in some cases final processing takes place outside of the County. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. The advantages and disadvantages would be investigated further during procurement process. Waste

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management and the move away from landfill are driven by the Climate Change agenda. Climate change is a wider issue which the development of this solution can positively contribute. Carbon footprint is assessed as part of the life cycle analysis (WRATE). GCC will ask for details of emissions management as well as any other foreseeable environmental impacts and plans to mitigate these will be requested during competitive dialogue. DEFRA have commented on this issue directly by stating: The plans could also make an important contribution to the drive to tackle climate change by delivering estimated net carbon savings of 33,800 tonnes in 2020, compared to the current arrangements, or 64,700 tonnes if the final technology solution includes combined heat and power. With regard to the utilisation of heat from the waste treatment process, a number of the sites included in the site options consultation have potential heat clients within close proximity. Further evidence on the CHP potential of sites will be prepared in advance of the Publication WCS. It should be noted that modern technology now means heat can be transferred up to 4km from a site. The client taking the heat does not need to be next door. There is legislation in place to ensure modern incinerators (and other types of thermal treatment, like pyrolysis and gasification) use the heat and power captured from the process. This can be used to generate heat and electricity to supply the local communities/businesses around a facility; this is generally known as Combined Heat and Power (CHP). However, this technology's primary function is for waste disposal and does not market itself as a primary source of heat and power generation. Such outputs are a benefit that can be harnessed from it primary waste disposal function. Where Bidders have proposed incineration as part of their solution for Gloucestershire, the Bidders will be expected to explore the possibility of CHP and ensure that the plant is CHP enabled. Incineration is currently the only proven technology to produce energy, Advanced Thermal Treatment and AD are new technologies and are not wholly proven on residual waste. The importance of the LAA and Sustainable Community Strategies is fully recognised. The Publication WCS will explain how the targets and objectives of these and other strategies have been taken into account. Progress with the Stroud Core Strategy is noted. At the present time however, these strategic allocations have not been identified. Seeking to co-locate waste facilities with such developments is therefore likely to prove difficult and potentially premature. Importantly over 300 sites across Gloucestershire were initially considered. These were reduced to just 13 suitable, available sites. Notably, no alternative sites in Stroud District were put forward by landowners, developers or the waste industry in response to the site options consultation. Whilst a small-scale dispersed approach may have merit, clearly whichever strategy is taken forward it needs to be deliverable. The comments concerning the local company with a high heat demand and the renewable energy proposals are noted. It would be useful if Stroud District Council were able to provide further details.

Number 368 Type IND Name J E Tapp Organisation not applicable/not provided

17. Do you have any comments on Section 3?

With reference to the above documents made available for consultation and comment I would like to take this opportunity to raise the following observations on the work carried out to date. Whilst the work is very thorough and has systematically assessed a large number of sites to arrive at the short list of 10 potential sites within zone C. I feel one important aspect has not been addressed when considering and short listing these sites, namely, loss of recreational and sporting facilities. Site 272 Wingmore Farm West considers four areas:- The Park 4.3 hectares, Site A 9 hectares, Site B 3.2 hectares, Site C 5.5 hectares, Site C which represents 25% of the identified area available, is currently licensed under planning regulations to operate as a clay target shooting ground for the benefit of any of the 600,000 licensed shotgun holders in the UK. The ground which is operated by Cheltenham & District Clay Club has taken many years of hard work to reach the high standard of safety and target quality made available to shooters on a regular basis. The location is ideal as it is away from areas of urbanisation and the raised land fill sites to the south and north east now act as very efficient noise barriers further enhancing the sites suitability for its current use. Finding an alternative site with so many topographical advantages will be very difficult if not impossible. The closure of this facility, which I understand is the only fully licensed shooting ground within the Gloucester Cheltenham area will create a serious lack of recreational sporting shooting and encourage more ad hoc and potentially dangerous shoots in farm fields under the 28 day change of use planning rules. In view of the advantages this site offers in the way of recreational facilities and safe shooting away from sensitive areas, I believe Site C should be removed from the Wingmore Farm West Area.

17. Officer Response.

Comments noted. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the inclusion criteria for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that this site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 142 Type PC Name Jessica Taylor Organisation Leonard Stanley Parish

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
8. Nastend Farm, Stroudwater Business Park		X	

4. Please give a reason for your answers to Question 3.

We have a number of objections to the proposed development at Nastend Farm, Stoudwater Business Park, Stonehouse. We view this site as inappropriate for the kind of developments being considered, for the following reasons: 1) DANGER TO SPECIES - the report itself acknowledges that there could be potential for significant negative effect on several BAP (Biodiversity Action plan) species and habitats, which are located within 500m of the site. This is one of the main reasons we would strongly object to this development on this site. 2) GREENFIELD SITE - This is a designated Greenfield Site and the should be kept as a green, undeveloped area as it was originally set aside, in order to protect from over development in the area and to maintain the environment for residents and BAP species. 3) SIZE OF THIS POTENTIAL 'ONE STOP SITE' - That this is a very large site - which will take municipal solid waste and commercial and industrial waste - and this raises two additional objections..... 3 a) HEALTH AND WELL-BEING OF RESIDENTS - This site is within 250m of residential properties. Aside from the possible dangers of incinerators, the building work involved in creating and maintaining this site and the subsequent continuous noise and traffic once complete, would also have an extremely negative impact on the wellbeing of residents. 3 b) CONGESTION - The waste would need to be transported through Nastend (small lanes) onto the A419 at a point which is already congested and suffers severe tailbacks to and from the M5 motorway.

4. Officer Response.

Comments noted. The site has not been taken forward into the publication WCS because although the County Council is the landowner, following discussions with the County Council's Waste Disposal Authority (WDA) it would appear that there is significant uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore, the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 233 Type IND Name Louise Taylor Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I'm not sure/I don't know

2. Please give a reason for your answer to Question 1.

I agree with some of the sites on C.

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X	X	
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			

4. Please give a reason for your answers to Question 3.

Wingmoor farm east already has waste facilities, makes sense to continue the project there. Aschurch site is on an already congested road and backing on to a residential estate, it has a number of schools within close proximity, which is a concern with fumes and traffic.

4. Officer Response.

Support for Wingmoor Farm East noted. The use of existing waste management facilities is consistent with national policy however, regard must be had to the cumulative effect of previous waste disposal facilities on the care and well being of the local community including any significant adverse impacts on environmental quality, social cohesion and inclusion or economic potential'. (PPS10). Comments relating to Easter Park (Ashchurch site) noted. In terms of traffic congestion, the initial highway assessment carried out on this site in support of the site options consultation, demonstrated that the development of a waste facility on this site could even lead to a net reduction in traffic compared with existing consents for industrial development on the site. Although there is residential development to the north, this is buffered by existing employment uses. Furthermore, it is important to note that the Companion Guide to PPS10 states that "With advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development". There are no schools within 250m of the site. Although there are schools further afield development of this site for waste use would have no greater impact than development for industrial use. Importantly, modern, well managed waste facilities do not generate dangerous 'fumes' in any case. PPS10, states that 'modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health'. Notwithstanding the above, since the site options consultation was undertaken in October 2009 and following discussions with the landowner it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. For this reason, it has been decided that this site will not be taken forward into the Publication WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the

Number 233 Type IND Name Louise Taylor Organisation not applicable/not provided

site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

6. Please give a reason for your answer to Question 5.

have not read enough about it yet.

6. Officer Response.

Comment noted.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

if it means responsibility is shared amongst towns, I agree.

8. Officer Response.

Comments noted, but on balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

don't know the sites.

10. Officer Response.

Noted.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

smaller sites, shared costs.

12. Officer Response.

Support noted.

17. Do you have any comments on Section 3?

Number 233 Type IND Name Louise Taylor Organisation not applicable/not provided

I would like to see the sites that already manage our waste to be developed for this plan.

17. Officer Response.

Comment noted. The re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community.

Number 193 Type PC Name Duke Theedam Organisation Wheatpieces Parish Council

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Zone C appears to be the only logical choice of venues, the other, surrounding areas being either likely to flood, or places of outstanding natural beauty.

2. Officer Response.

Support for Zone C noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X	X	
4. Javelin Park, Haresfield		X	
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence		X	
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

I think that site is already used for similar puposes.

4. Officer Response.

Support for Wingmoor Farm East and West noted. The re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

6. Please give a reason for your answer to Question 5.

pro's and cons for both.

6. Officer Response.

Comment noted. The WCS has a role to play in ensuring all new development is underpinned by appropriate waste management infrastructure (e.g. recycling facilities). The site options consultation paper however focuses on identifying a site or sites suitable for accommodating a strategic waste management facility and there has been no interest from either waste operators or the developers leading the urban extensions in providing this type of facility as part of the development. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead their waste management requirements will be addressed through the

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general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I do not support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

Zone C is flexible enough, with 10 potential sites as it is.

8. Officer Response.

Comment noted.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney		X	
3. Land at Lydney Industrial Estate, Lydney		X	

10. Please give a reason for your answers to Question 9.

I'm opposed to any further industrialisation in the Forest of Dean.

10. Officer Response.

Comment noted.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I do not support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

There is no need, Zone C contains sufficient suitable sites, the best of which are 1,2 and 10.

12. Officer Response.

Comment noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No.

13. Officer Response.

Noted.

14. Do you have any comments on the Executive Summary?

No

14. Officer Response.

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Noted.

15. Do you have any comments on Section 1?

No

15. Officer Response.

Noted.

16. Do you have any comments on Section 2?

No

16. Officer Response.

Noted.

17. Do you have any comments on Section 3?

No

17. Officer Response.

Noted.

18. Do you have any comments on Section 4?

No

18. Officer Response.

Noted.

19. Do you have any comments on the Sustainability Appraisal reports?

No

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

No

20. Officer Response.

Noted.

Number 144 Type IND Name Simon Thomas Organisation not applicable/not provided

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester		X	

10. Please give a reason for your answers to Question 9.

FOSS CROSS INDUSTRIAL ESTATE I am writing in response to the WCS consultation exercise with specific emphasis on the inclusion of Foss Cross. I am a resident of the hamlet of Calmsden and Working Farm Manager of Calmsden Farms which surrounds Foss Cross. I consider the site to be UNSUITABLE for the treatment of residual household waste for a number of reasons: 1. The site is some distance from Gloucester and Cheltenham and is outside of zone C. 2. There would be an increase in the volume of traffic which would have a detrimental effect on the hamlet of Calmsden and surrounding areas which alredy suffer as a result of the traffic/litter/flytipping associated with the industrial estate/recycling centre. 3. Part of the site is already used as a recycling centre and the small area currently used for this would probably not accommodate facilities for the treatment of waste. The remainder of the site is occupied by a number of successful local businesses which could be adversely affected by excessive traffic,noise and smell. Also part of the area highlighted on the map in the consultation document does not even form part of the industrial estate it is part of one of the neighbouring fields belonging to Calmsden Farms. 4. The site is in an AONB and is just south of a SSSI. The landscape aspect would be detrimental especially an incinerator stack of c.40 to 50m as outlined in the habitat regulations assessment. 5. Calmsden Farms, which surrounds the site, is in the process of joining the Higher level environmental scheme run by Natural England. The development of the site for the treatment of waste could affect the profile of birds adjacent to the site. The habitats that we are working hard to establish next to the site are tailored to specific birds as part of the farmland bird project and development of this nature could have a damaging effect through encouraging vermin and corvids. In summary the site is already used successfully as a HRC which uses the available space. There would be no further room for the treatment of waste at Foss Cross without distuption to established businesses. I would urge you NOT to include this site for the treatment of residual waste, both residential and commercial.

10. Officer Response.

Comments noted. Although the site is outside Zone C it offers the potential to play a supporting role for facilities within Zone C. In terms of traffic, PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. In terms of the existing use of the site, the re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community. Odour and noise are matters that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any 'sensitive receptors'. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning conditions. In terms of development within the AONB, national policy does not prevent development within the AONB. It does, however, demand that the need for such development can be demonstrated and that the development is carried out to high environmental standards. Foss Cross would not be considered suitable for a large-scale facility and would only be suitable for a small-scale facility to support a strategic network of sites. Any potential impacts from development on the adjoining areas of farmland would need to be considered through an environmental assessment at the planning application stage should a detailed proposal come forward. Existing contamination of the site would also be considered. Notwithstanding the above, having regard to forecast capacity requirements (i.e. the number of sites needed) and the need to manage waste close to source in line with national policy, it has been decided not to allocate any strategic sites outside the area referred to as Zone C (the central area of Gloucestershire). As this site is outside Zone C it is not being taken forward. Also, the lack of waste industry interest in response to this site through the site options consultation (2009) raises question marks over the deliverability of the site for waste management purposes.

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Furthermore, the Environment Agency (EA) has raised concerns in response to this site in relation to groundwater issues. Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 247 Type IND Name Russell Thompson Organisation not applicable/not provided

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester		X	

10. Please give a reason for your answers to Question 9.

This is in a designated AONB in the Cotswolds and the road linking to it from the A429 is unsuitable for heavy traffic. This is currently a small household recycling centre with an excellent ratio of recycling to non-recyclable waste (the Cotswolds being the second highest in the country for recycling success). It would therefore be unfair and untenable for it to have to absorb the county's waste damaging its reputation and the surrounding environment in the process.

10. Officer Response.

Comment noted. National policy does not prevent development within the AONB. It does, however, demand that the need for such development can be demonstrated and that the development is carried out to high environmental standards. Foss Cross would not be considered suitable for a large-scale facility and would only be suitable for a small-scale facility to support a strategic network of sites. It is highly unlikely that waste would be imported to Foss Cross from outside of the AONB because the purpose of including smaller dispersed sites would be allow waste to be treated closer to its arisings and improve sustainability. At this stage, without detailed modelling, it would not be possible to say for certain how this would affect lorry movements, but there is no indication that lorry movements would be increased, it is more likely that they would be decreased. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. This site will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

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3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
7. Land north of Railway Triangle, Gloucester		X	

4. Please give a reason for your answers to Question 3.

Land north of the railway triangle While some of this site is already in a waste related use, it does give rise to problems, as such the City Council would be against any intensification of its use. There is a limit on the tonnage that can use the site, and while this is currently set at 75000 tonnes it is generally seen as an inappropriate site for such a large facility given the poor road infrastructure and close proximity of nearby dwellings and other sensitive uses such as the hospital. The site dossier accepts this and suggests that a new access on to Metz Way is needed. Even then, there are concerns about the ability of the road network to adequately cope. The only potential use for any waste heat is the railway triangle. It is suggested that this would be difficult due to its location the wrong side of the tracks. Given the cost of funding a new rail crossing, and the proximity of residents and other sensitive uses, it is considered that any expansion of the site over and above current is not acceptable or even likely. It is suggested therefore that the site is deleted from the plan. Netheridge Sewage works This site already has an existing AD plant and takes in biodegradable waste. Although not entirely clear from the site dossier it appears ST may be wishing to expand this operation. Certainly the available foot print is not very large and we can only assume that intensification of operations is the objective. Although access to the site is now better with the new South West Bypass, the residents of Netheridge Close will still be impacted upon by new lorry movements. Given the benefits of AD as detailed above, we would support in principal this use, subject to safeguards for the amenity of local residents and a strict control on highway movements. Any other uses would be unacceptable. We still question however, the validity of identifying a site that is unlikely to take more than a small proportion of the county's waste and request therefore that the site is deleted from the strategy. Land adj Quadrant Business Centre Quedgeley. This site is just to the immediate south of Waterwells farm just over the boundary in Stroud District. While no houses currently abut the site this may change in the future. Existing houses are a couple of hundred metres away. There are many benefits to this site as it is potentially well connected to the road network and is likely to have new development built around it. If Combined Heat and Power were to be pursued, a market for waste heat could potentially be found. There needs to be significant safeguards however, concerning the amenity of local residents and any very large scale facility may be inappropriate on local amenity grounds. Javelin Park This site is just over 2km from the southern boundary of the City. While benefiting from good vehicular access it is a few hundred metres from significant new housing. Having no development proposed adjacent, finding a market for waste heat is problematic. There are also concerns about a very large-scale facility in a generally open flat part of the Seven Vale at the foot of the Cotswolds scarp and the resulting visual impact. While not objecting to the site outright, it is suggested that the strictest environmental controls are placed upon it, and that visual intrusion is accounted for. Importantly any other sites that have an available heat market should be viewed sequentially as preferable.

4. Officer Response.

Comments noted. PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Notwithstanding the above, the site has not been taken forward into the Publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste

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facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). In relation to Site 9, Netheridge, Severn Trent Water did indicate to the WPA that Anaerobic Digestion is the only technology that they are interested in. Notwithstanding this, since the site options consultation was undertaken in October 2009 and following discussions with the landowner it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. For this reason, it has been decided that this site will not be taken forward into the Publication WCS. The comments in relation to Quadrant Business Centre are noted. Since the site options consultation was undertaken in October 2009 and following discussions with the landowner it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. For this reason, it has been decided that this site will not be taken forward into the Publication WCS. In respect of Javelin Park, at the present time, the Council is technology neutral and therefore the potential for Combined Heat and Power (CHP) is unknown or uncertain. However the WPA have recently produced a technical evidence paper on CHP (broadly assessing the 13 site consulted on at Site Options) which may be of interest. In terms of visual impact, the openness of Javelin Park is acknowledged. Any proposal will need to be supported by a robust design and access statement with an expectation that visual impact will be minimised. It should be noted that by not takinga site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations

17. Do you have any comments on Section 3?

Thank you for the opportunity to comment on the above document. Please find below the formal response of Gloucester City Council as resolved at Full Council on the 26th November 2009, with minor amendments agreed by Group Leaders on the 30th November. First of all the Council welcomes the opportunity to comment on a site-specific document. While criteria based policies may be appropriate for smaller facilities, it is considered imperative, for developer and community alike, that some certainty is built into the process with detailed allocations for large scale facilities. Although a site-specific document, you have suggested that the overall strategy can be commented upon. As such our response will be based around the broad strategy, and whether or not the proposals can deliver a low carbon response to waste management. We will also comment on site specifics. In terms of a strategy given the very pressing need to cut Greenhouse Gas Emissions the City Council strongly support a low carbon methodology for dealing with residual waste. Given the inefficiencies inherent in combusting waste even with associated combined heat and power that would by definition not include incineration. With the targets of a 26% CO2 reduction by 2020 and 80% by 2050 set in the Climate Change Bill the county can not afford to set in place a spatial planning document (with a life span 15 years that will deliver facilities that may be operational in 25 years) that does not have this as the determining factor. Waste can be a significant contributor to greenhouse gases, if disposed of properly it can reduce emissions. Our overriding question therefore is; can the Waste Core Strategy deliver a low carbon option? Looking at a low carbon option will invariably lead us to discuss technologies. While some sort of Energy From Waste plant will be preferential to landfill, it is not efficient in that combusting plastics is putting greenhouse gases into the atmosphere and burning organic matter in a furnace along with everything else is not an effective way of liberating energy. If electricity is to be generated it needs to be a Combined Heat and Power (CHP) process with a local heat demand to deliver a more efficient process. A more effective way of achieving carbon savings is to use a Mechanical Biological Treatment (MBT) plant combined with an Anaerobic Digester (AD) dealing with some of the organic matter. Recent examples of this separate out non-organic matter to be to be land filled or recycled. Organic matter is put into a digester to generate Methane (the digestate can be used as soil conditioner) low quality organics are made into a high calorific Refuse Derived Fuel (RDF). Further efficiency gains can be made if the gas is burnt in a CHP or even better used to power vehicles or put into the gas grid. The above can be done on a large scale, and the strategy as promoted can achieve this. However, there are 2 missing components. Very few of the sites are located in close proximity to potential heat markets. Although questions have been raised over RSS and the urban extensions it identified, there will be growth in the county, and there are sites where this is far more likely. Preferred waste sites therefore should be located

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adjacent to areas of growth so that waste heat can be utilised. This would rule out most sites with the possible exception of the Wingmore Farm sites, Easter Park Ashchurch, and land adj to the Quadrant Business Centre. The other aspect of a low carbon option that has not been provided for is landfill. While landfill has a bad name in waste management circles, for some waste streams it may be the most sustainable option. Plastic is oil based and locking its carbon out of the atmosphere in landfill can be a sensible option. An MBT plant while reducing waste, depending on the process can still leave a significant amount of inert waste often with a high plastic component. If a low carbon option is to be followed then landfill space should be allocated. This has not been done the plan fails therefore on this requirement. If the lowest carbon option were to be followed the next step would be to make the above processes locally available. Not only would this cut down on transport emissions, but send a powerful message that communities should deal with their own waste. In spatial planning terms this would require a number of smaller sites to be allocated around the county taking waste from their immediate hinterland. While both of these options will be determined more by the Residual Waste Contract and associated PFI than the WCS, the spatial component needs to be in place so that a low carbon option if chosen can be delivered. At present this is not the case. To conclude we support a low carbon approach to the strategy that by definition excludes incineration. In spatial planning terms this means MBT with AD has to be facilitated potentially next to a heat market. The current strategy does not do this as no landfill is allocated over the plan period and potential heat markets are non-existent for some of the sites. An even lower carbon option of local facilities dealing with local waste should be put forward as a potential solution. With regard to site specifics we object to the inclusion of the land to the North of the Railway Triangle. While not objecting to Netheridge we would ask for assurances that this is for AD only and that other waste uses are restricted on amenity and highway grounds. Given the size of the site we suggest it is deleted from the plan. For Javelin Park we are concerned at the lack of a heat market and the visual impact of a mega structure in such an open site at the foot of the Cotswolds. For Land adj Quadrant Business Park while a heat market is available local amenity considerations need to be built in.

17. Officer Response.

Comments noted. Dealing with each in turn. The support expressed for allocating strategic sites within the WCS is welcomed. The WCS will also include criteria-based policy to allow for smaller-scale, speculative proposals to come forward in appropriate locations. The comments concerning the need to tackle climate change through a low-carbon approach/strategy are noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. One of the key aims of the residual project is carbon reduction and to contribute to GCC's climate change agenda, a move away from landfill will do this in a number of ways. Less waste to landfill means that less greenhouse gases will be produced. In addition, if recyclable materials are able to be extracted using the technologies, this will replace the use of virgin materials and if energy is able to be produced by the solution, this will lessen the pressure on fossil fuels. The heat and power that can be gained from a waste facility offers a real benefit environmentally by reducing our reliance on fossil fuels and creates a potential income of several million pounds per annum for the council. Energy recovery (in the form or electricity and/or heat) will be dealt with throughout the procurement process. Waste management and the move away from landfill are driven by the Climate Change agenda. Climate change is a wider issue which the development of this solution can positively contribute. Carbon footprint is assessed as part of the life cycle analysis. DEFRA have commented on this issue directly by stating: The plans (for Gloucestershire) could also make an important contribution to the drive to tackle climate change by delivering estimated net carbon savings of 33,800 tonnes in 2020, compared to the current arrangements, or 64,700 tonnes if the final technology solution includes combined heat and power. The potential role and value of combined heat and power is fully acknowledged. There is legislation in place to ensure modern incinerators (and other types of thermal treatment, like pyrolysis and gasification) use the heat and power captured from the process. This can be used to generate heat and electricity to supply the local communities/businesses around a facility; this is generally

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known as Combined Heat and Power (CHP). However, this technology's primary function is for waste disposal and does not market itself as a primary source of heat and power generation. Such outputs are a benefit that can be harnessed from it primary waste disposal function. Where Bidders have proposed incineration as part of their solution for Gloucestershire, the Bidders will be expected to explore the possibility of CHP and ensure that the plant is CHP enabled. Comments in respect of MBT noted. In December 2009, GCC announced the shortlist of successful Bidders to move to the detailed solution stage, this announcement also included the types of core technologies that these Bidders have proposed, which included MBT and incineration. The comments concerning the need for sites to be located next to existing or future heat markets are noted. Ideally, heat markets or heat clients should be located close to the source of heat being generated. However modern technology means that heat can be piped with little loss up to 4km away. This reduces the need for a waste site generating heat to be located immediately next to the recipient. An evidence paper on the CHP potential of the 13 sites will be prepared in advance of the Publication WCS. With specific regard to the urban extensions, following the potential abolition of the RSS there is now some doubt about these coming forward. Furthermore, in response to the site options consultation, there was little interest from the waste industry or the developers of the urban extensions in developing waste facilities as part of these potential developments. Should a proposal for any of these areas come forward this will be determined having regard to criteria-based policy and other material considerations. In terms of landfill, the focus of the site options consultation paper was on identifying potential sites suitable for the location of residual waste treatment facility/facilities. There will always be a role for landfill and this is acknowledged. The existing and future situation concerning landfill in Gloucestershire and the proposed policy approach will be clearly laid out in the Publication WCS. With regard to small-scale local sites, the site options consultation included sites in all Gloucestershire Districts/Boroughs other than Cheltenham (where no suitable sites were found to be available). Ten of these sites were located inside Zone C and 3 outside. Views were invited on whether a combination of sites should be used. At this stage it has not been determined whether treatment of residual waste will take place on one large site or several smaller sites. The council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the county. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. With regard to Site 5, Land adjacent to Quadrant Business Centre, since the site options consultation was undertaken in October 2009 and following discussions with the landowner it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. For this reason, it has been decided that this site will not be taken forward into the Publication WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations. With regard to Site 7, Land North of Railway Triangle, since the site options consultation was undertaken in October 2009, the Waste Planning Authority has carefully considered all the issues related to this site. Whilst it is fully recognised that it does currently serve a useful function as a site primarily handling construction and demolition waste, it will not be taken forward as a strategic site allocation due to highways and access issues. The site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of

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new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Any waste proposals that come forward on this site will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations. With regard to Site 9, Netheridge Sewage Treatment Works, since the site options consultation was undertaken in October 2009 and following discussions with the landowner it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. For this reason, it has been decided that this site will not be taken forward into the Publication WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 234 Type IND Name Rebecca Tomkins Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

I live with my Husband and four children on the estate just behind the proposed site. I do not want to live by the smell and pollution of this site. My children attend Ashchurch and Tewkesbury school and would have to cope with the large lorries and extra pollution from them.

2. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. Notwithstanding the above, the Easter Park site has not been taken forward into the Publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch		X	
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

Dont know where the other sites are. Just know I dont want this on my doorstep which is next to Easter park

Number 234 Type IND Name Rebecca Tomkins Organisation not applicable/not provided

4. Officer Response.

Comment noted.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Disagree

6. Please give a reason for your answer to Question 5.

Just dont want any of these proposals to be at Easter park

6. Officer Response.

Comment noted. The proposed urban extensions do not include the site at Easter Park rather they relate to potential growth on the fringes of Gloucester and Cheltenham. Significantly however, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Should the urban extensions go ahead, there are likely to be opportunities to integrate small-scale waste infrastructure such as composting/recycling facilities.

7. Do you support the identification of sites outside Zone C?

I'm not sure/I don't know

8. Please give a reason for your answer to Question 7.

Not sure where zone c is. If this is Easter Park I dont support.

8. Officer Response.

Easter Park is in Zone C. This question relates to sites outside Zone C.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

Dont know where these sites are.

10. Officer Response.

Comment noted. The site options consultation paper included a site schedule for each site including description and map.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I do not support the approach of using a combination of sites from within and outside Zone C

13. Are you aware of any other sites that might be suitable for treating municipal waste?

Needs to be completly away from any housing estate area. We know there is evidence that these sites can cause cancer.

13. Officer Response.

PPS10, states that modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health. Furthermore, the detailed consideration of a waste process and the implications, if any, for human health is the responsibility of the pollution control authorities. PPS10 also states that, where concerns about health are raised, waste planning authorities should avoid carrying

Number 234 Type IND Name Rebecca Tomkins Organisation not applicable/not provided

out their own detailed assessments, rather they should ensure, through drawing from Government advice and research and consultation with the relevant health authorities and agencies, that they have any advice on implications for health. The WPA duly sought the advice from the PCT/NHS through the site options consultation. Please also see response to Q2.

15. Do you have any comments on Section 1?

There is to many houses and schools to close to the proposed site Easter park. This would have terrible effects on pollution and traffic in this area.

15. Officer Response.

Comment noted. Please see responses to Q2 and Q13. With regard to pollution it should be noted that planning and pollution control regimes are separate but complimentary. Pollution control is concerned with preventing pollution whilst planning controls the development and use of land. Waste planning authorities are expected to work on the assumption that the relevant pollution control regime will be properly applied and enforced. Furthermore, PPS10 states that modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health. In terms of traffic, PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Notably for Easter Park, the assessment identified a potential net decrease in traffic compared with that which could be generated if the existing planning permission for the site were to be implemented. Any strategic site allocation made in the Publication WCS will be supported by a further highway assessment with any necessary mitigation (e.g. junction improvements) clearly identified as site-specific requirements. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan.

17. Do you have any comments on Section 3?

Easter park is not suitable and would be totally against the planning and development of this site.

17. Officer Response.

Comment noted. Please see response to Q2.

Number 115 Type IND Name John Torr Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X	X	
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

17. Do you have any comments on Section 3?

'Easter Park' the Ashchurch option is too near residences and heavy congestion on the Ashchurch Road leading to M5

17. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. In terms of traffic, PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Notably for Easter Park, the initial highway assessment identified a potential net decrease in traffic compared with the amount of traffic that could be generated at this site if the existing planning permission for employment use were to be implemented. Notwithstanding the above, the site has not been taken forward into the Publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 360 Type AGEN Name Henning Totz Organisation South West Councils

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

We commented on the Waste Core Strategy (WCS) Preferred Options Paper and supported the locational strategy put forward as Option WPO7c. Zone C illustrated in para. 3.27 of the consultation document appears to be based on Option WPO7b. We believe that this is still in line with the draft revised RSS.

2. Officer Response.

Support noted.

17. Do you have any comments on Section 3?

We understand that residual waste treatment capacity is required to divert a maximum of 415,000 tonnes of Municipal Solid Waste and Commercial and Industrial Waste from landfill. We welcome that the Council leads on the delivery of an energy-from-waste facility, with potential for CHP (175,000t/annum) . Completion is currently anticipated for 2015. Whilst delivery of this facility will be crucial to achieve landfill reduction targets, additional facilities are however required (i.e. to treat a maximum of 240,000t/annum). Planning applications for other strategic waste management facilities could hence be submitted prior to the adoption of the WCS. Identifying strategic sites for waste management facilities is therefore strongly supported. However, developers and/or industry may also plan to deliver additional waste management facilities at the urban extensions to the SSCTs, as per draft revised RSS Policy HMA3. We therefore think that the WCS, in addition to the strategic sites, should provide sufficient flexibility so that facilities can be integrated into proposals for the urban extensions. The urban extensions at the SSCTs will be mainly built on greenfield land, and we appreciate that identifying specific sites is difficult at this stage. Hence we would support a criteria-led approach. Criteria should align with draft revised RSS policies, and particularly with policies RE3 and RE5, and Development Policies G and F. Three sites for new waste facilities have been identified at or adjacent to the existing landfill site at Wingmoor Farm. The cumulative impacts from existing and possible future development at this location will need to be carefully assessed. Also, it will be important to closely monitor progress and whether there are issues that prevent the industry from delivering facilities.

17. Officer Response.

Comments noted. Dealing with each in turn. Support for the identification of strategic sites noted. With regard to urban extensions, the need for flexibility is acknowledged, particularly given the fact that the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. Whilst the site options consultation revealed little support from the waste industry and urban extension developers, the WCS will include criteria-based policy which will allow proposals to be considered if they should come forward. In terms of technology, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. With regard to the use of existing facilities, the re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community. The need for effective monitoring of progress is acknowledged. The monitoring and delivery frameworks identified in the site options consultation paper will be worked up in more detail in the Publication WCS.

Number 400 Type AGEN Name Henning Totz Organisation South West Councils

17. Do you have any comments on Section 3?

Further response from SW Councils submitted in response to clarification sought from GCC in relation to the following issues; waste tonnages, technology and cumulative impact: Generally we support your approach to waste management, the identification of strategic waste sites in line with the locational strategy and the Council's approach to diverting waste away from landfill. We also support your comprehensive work on the technical evidence base behind the Waste Local Development Framework, and the preparation of a number of evidence papers. Regarding the combined total of residual MSW and C&I waste I based my observations on Figure 5 and para. 3.8 in the consultation paper. Gloucestershire County Council identified the need for residual waste treatment capacity for 150,000t of MSW and 145,000t of C&I waste, with the emphasis on MSW to meet LATS requirements. I support the Council's ambition to achieve a recycling target of 60% for MSW. I also do not question the evidence behind the C&I figure and note that you are in the process of reviewing your C&I waste data through a Gloucestershire capacity study and the additional information from the EA and DEFRA. You should consider allowing for some flexibility for the market to deliver facilities which could treat additional residual waste, for example if it becomes clear during the plan period that there are difficulties to achieve the recycling target. I understand that the figure 150,000 - 270,000t also reflects a range of residual MSW that might need to be treated. A plan-monitor-manage approach is obviously the way forward here to avoid an unrealistic under- or overprovision of facilities. As you have identified a number of sites suitable to accommodate facilities, I understand that there would be contingencies in case additional facilities were needed. With regard to my comments on the County's residual waste project I quoted DEFRA's PFI project information paper published on the Department's website. The paper mentions an energy-from-waste facility with potential for CHP - but also the fact that the authority is technology neutral. I agree with you that the public may have a negative perception of energy from waste facilities as they are commonly associated with incineration, although other, more advanced technologies (including non-thermal) fall into this category also. I can furthermore confirm that we do not disagree with co-locating additional residual waste treatment facilities at Wingmoor Farm - PPS10 indeed advises that WPAs should consider a broad range of locations including industrial sites, looking for opportunities to co-locate facilities together. The cumulative effects of potential additional and existing facilities however need to be considered, something the Sustainability Appraisal (Stage 2, Appendix 2) refers to as well. This is purely an observation and it will be for you how to take it into account.

17. Officer Response.

Comments noted. Dealing with each in turn. Support for the identification of strategic sites noted. Support for evidence base noted. Support for recycling target noted. The need for flexibility is acknowledged. The WCS will include criteria-based policy to allow for speculative proposals to come forward. It will also include a monitoring and delivery framework with actions identified should policies and proposals fail to deliver as expected (e.g. recycling target not met). The re-use/intensification of existing waste management facilities and co-location is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community.

Number 81 Type IND Name A Towell Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I write to object to the use of all 13 of the sites listed for possible waste treatment in Gloucestershire, but especially the Javelin Park site on the grounds that: Any of these sites could be used for incineration, which I oppose. Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. The long term costs to the taxpayer will be higher with incineration. Incinerators act as a disincentive to reduce, reuse and recycle. The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. Large incinerators in other areas of the country are already deemed to be a mistake.

17. Officer Response.

Comments noted. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 82 Type IND Name S Towell Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I write to object to the use of all 13 of the sites listed for possible waste treatment in Gloucestershire, but especially the Javelin Park site on the grounds that: Any of these sites could be used for incineration, which I oppose. Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. The long term costs to the taxpayer will be higher with incineration. Incinerators act as a disincentive to reduce, reuse and recycle. The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. Large incinerators in other areas of the country are already deemed to be a mistake.

17. Officer Response.

Comments noted. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 411 Type IND Name Suzanne Towell Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch		X	
4. Javelin Park, Haresfield		X	
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence		X	
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works		X	
10. The Park, Wingmoor Farm West	X	X	

Number 388 Type IND Name K Tranter Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	

4. Please give a reason for your answers to Question 3.

I am writing to you in connection with the proposed siting of the new waste disposal areas. I am of course a member of the Cheltenham & District Clay Club and would urge you not to site it in (area c) as this would mean myself and at least two hundred other members would have to find an alternative ground for our sport locally (and there are none). The club has been there for many years and as enhanced the landscape. I believe there are alternative sites already vacant and with more accessibility i.e close to motorways etc. Also have you considered the amount of heavy traffic using these narrow roads to Wingmoor Farm though Bishops Cleeve and Stoke Orchard.

4. Officer Response.

Comments noted. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the inclusion criteria for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that this site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 167 Type IND Name W Treen Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
3. Easter Park, Ashchurch		X	

4. Please give a reason for your answers to Question 3.

I have grave concerns and object to the possible siting of a waste incinerator at Easter Park, Ashchurch. We have lived in Stanford Road since getting married in 1974. The garden has always been used as a vegetable garden. In latter years, there has been a very noticeable increase in the height of the water table. Many years ago, I would be able to quite easily dig the garden each winter without any problems. Over recent years, as the spade was put in, a squelching noise could be heard, and water would appear as the blade was moved. If a fork was put in, again, as it was removed, the holes left would gradually fill with water. We are now in the situation that after just a day's rain, the ground is waterlogged and I am currently wondering if it is actually worth planting any seeds at all. Now I know it will be disputed by those who think they know better and think they will not create further problems, but this situation has only arisen since the continual building around the Ashchurch Gardens and Northway area. In respect of this, I am deeply concerned about: 1. The future level of the water table rising due to more building. 2. The danger of any possible pollution [we had a scare some years ago one Christmas, when a small fire broke out at the Zlin factory and pollution from the old Dowty factory on the site you are proposing to develop]. 3. The flood risk due to insufficient drainage/surface water run off and over development which we are already experiencing. 4. The increase of traffic on the A46 and surrounding roads. Please note, WE, as residents know this, because WE experience the above every day of every month of every year. WE live here and WE know the area and do not expect to have such plans thrust upon us by those who know nothing about our area.

4. Officer Response.

Comments noted. Dealing with each in turn. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. In terms of the height of the water table, it is unclear from the anecdotal evidence provided that there has been an increase in the height of the water table around this site. It is acknowledged that built development can have an effect on such matters but it is unclear whether that is the case here. Importantly the site already has planning permission for employment use. The principle of development in this location has already therefore been accepted. With regard to pollution, it should be noted that planning and pollution control regimes are separate but complimentary. Pollution control is concerned with preventing pollution whilst planning controls the development and use of land. Waste planning authorities are expected to work on the assumption that the relevant pollution control regime will be properly applied and enforced. PPS10, states that 'modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health'.In terms of flood risk, the site has been subjected to a Strategic Flood Risk Assessment (SFRA) which confirmed that the site is located within Flood Zone 1 and is therefore at low risk of flooding. Notwithstanding this, any proposal of more than 1 ha on this site, whether for waste management or any other use, would need to be supported by a detailed Flood Risk Assessment (FRA). In terms of traffic, the site has been subjected to an initial highway assessment which suggests that a waste use on this site could result in a net decrease in traffic compared with that which may be generated through the implementation of the existing planning permission for employment use. Notwithstanding the above, the site has not been taken forward into the publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site.

Number 167 Type IND Name W Treen Organisation not applicable/not provided

Furthermore the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS,national policy and any other material considerations.

Number 331 Type IND Name R Trelfa Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

It is at the centre of the conurbation.

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X		
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park	X		
9. Netheridge Sewage Treatment Works		X	
10. The Park, Wingmoor Farm West			

4. Please give a reason for your answers to Question 3.

7. Will require major changes to the road network. 9. Is in the flood plain

4. Officer Response.

Comments noted. In relation to Site 7, Land North of Railway Triangle, the site has not been taken forward into the publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the Publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals

Number 331 Type IND Name R Trelfa Organisation not applicable/not provided

for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations. In relation to Site 9, Netheridge Sewage Treatment Works, the site has not been taken forward into the Publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore, the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the Publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. The site's existing Anaerobic Digestion (AD) capacity for waste water and other assorted wastes is recognised and any additional increase in these facilities would be considered through other criteria-based policies in the WCS.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

The Cheltenham area has road conections equal to those of Zone C

8. Officer Response.

Comments noted. Cheltenham is in Zone C. The extensive site selection process did look at Cheltenham, but there were no suitable sites available.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

I don't know the areas well enough.

10. Officer Response.

Noted.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

Some redundancy should be built in in order to ensure availability.

12. Officer Response.

Comments noted, some contingency has been built in.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

Brockworth trading estate has the best road connections of all.

Number 331 Type IND Name R Trelfa Organisation not applicable/not provided

13. Officer Response.

Comment noted. It is acknowledged that the Gloucester Business Park in Brockworth has excellent road links. This site was investigated as part of the technical study, but the landowner indicated that the site would not be available for residual waste management purposes and was therefore excluded from any further consideration. Please refer to Technical Evidence Paper WCS-N and its Appendix C.100.

14. Do you have any comments on the Executive Summary?

No.

14. Officer Response.

Noted.

15. Do you have any comments on Section 1?

No.

15. Officer Response.

Noted.

16. Do you have any comments on Section 2?

No.

16. Officer Response.

Noted.

17. Do you have any comments on Section 3?

Brockworth should be included.

17. Officer Response.

Comment noted. It is assumed that by Brockworth the respondent is referring to Gloucester Business Park at Brockworth. Assuming this is the case, this site was considered as part of an initial long-list of 329 sites on the basis of it being an existing employment use however it was ruled out from further consideration on the grounds of deliverability with the landowner clearly stating that they had no wish to promote a waste treatment facility on any part of the site.

18. Do you have any comments on Section 4?

No.

18. Officer Response.

Noted.

19. Do you have any comments on the Sustainability Appraisal reports?

No.

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

No.

20. Officer Response.

Noted.

Number 358 Type IND Name Anne Trower Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
3. Easter Park, Ashchurch		X	

4. Please give a reason for your answers to Question 3.

As local residents to the proposed possible site, we are absolutely against this as not only would it be in close proximity of large housing estates but it would create yet another flood risk (as if we don't have enough of them already!) as well as the traffic problem it would create on an already very busy road.

4. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. Notwithstanding the above, Easter Park has not been taken forward into the publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 296 Type IND Name Jane Tuck Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

I do not want this so close to such a large number of housing

2. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

No further traffic poring into Bishops Cleeve

4. Officer Response.

Comment noted. PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Disagree

Number 296 Type IND Name Jane Tuck Organisation not applicable/not provided

6. Please give a reason for your answer to Question 5.

Why not put out in the middle of county where little housing. Why have this obsession with causing the greatest possible disruption to people's everyday living and quality of life, not to mention health.

6. Officer Response.

Comment noted. Please see response to Q2. Notwithstanding this, it is significant to note that the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the Government's intention to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I'm not sure/I don't know

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

11. Do you support the approach of using a combination of sites within and outside Zone C?

I'm not sure/I don't know

13. Are you aware of any other sites that might be suitable for treating municipal waste?

As previously suggested anywhere in Gloucestershire than doesn't have large density of population

13. Officer Response.

Please see response to Q2.

17. Do you have any comments on Section 3?

As previously mentioned why look at sites with such close proximity to housing when this disrupts everyday life and quality of living is affected by living with a potential "time bomb" on our doorsteps

17. Officer Response.

Comment noted. Please see response to Q2.

Number 145 Type PC Name Mark Tuffnel Organisation North Cerney Parish Council

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester		X	

10. Please give a reason for your answers to Question 9.

Foss Cross Industrial Estate I am writing in response to the consultation exercise with specific comments on the possible inclusion of Foss Cross. I am the chairman of North Cerney Parish Council and we consider the site NOT to be suitable for the treatment of residual household waste for a number of reasons: 1.The site is not close to Cheltenham and Gloucester and is outside zone C. It would result in additional journey time which would not be sustainable; 2.It would increase the volume of traffic which would have a detrimental effect on the neighbouring hamlet of Calmsden; 3.The site is successfully used as a recycling centre and the small area currently used for this purpose would not readily adapt to the treatment of waste. Most of the industrial estate is occupied by a number of successful local businesses which could be adversely affected by excessive traffic, noise and smell; 4.The site is in an AONB and is just south of a SSSI. The landscape aspect of a development would be detrimental; 5.There is seepage of methane from the old landfill site just north of the recycling centre which indicates there is a significant risk of contamination of the land already. In summary the site is successfully used as a recycling centre which uses the available area to its maximum. There would be no further room for the treatment of residual waste or transfer of organic waste at Foss Cross. I therefore urge you NOT to include this site for the treatment of residual waste, both residential and commercial.

10. Officer Response.

Comments noted. Although the site is outside Zone C it offers the potential to play a supporting role for facilities within Zone C. In terms of traffic, PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. In terms of the existing use of the site, the re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community. Odour and noise are matters that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any 'sensitive receptors'. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning conditions. In terms of development within the AONB, national policy does not prevent development within the AONB. It does, however, demand that the need for such development can be demonstrated and that the development is carried out to high environmental standards. Foss Cross would not be considered suitable for a large-scale facility and would only be suitable for a small-scale facility to support a strategic network of sites. Any potential impacts from development on the adjoining areas of farmland would need to be considered through an environmental assessment at the planning application stage should a detailed proposal come forward. Existing contamination of the site would also be considered. Notwithstanding the above, having regard to forecast capacity requirements (i.e. the number of sites needed) and the need to manage waste close to source in line with national policy, it has been decided not to allocate any strategic sites outside the area referred to as Zone C (the central area of Gloucestershire). As this site is outside Zone C it is not being taken forward. Also, the lack of waste industry interest in response to this site through the site options consultation (2009) raises question marks over the deliverability of the site for waste management purposes. Furthermore, the Environment Agency (EA) has raised concerns in response to this site in relation to groundwater issues. Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 140 Type IND Name Mark Tufnell Organisation not applicable/not provided

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester		X	

10. Please give a reason for your answers to Question 9.

Foss Cross Industrial Estate I am writing in response to the consultation exercise with specific comments on the possible inclusion of Foss Cross. I am the neighbouring farmer/landowner and consider the site NOT to be suitable for the treatment of residual household waste for a number of reasons: 1.The site is not close to Cheltenham and Gloucester and is outside zone C. It would result in additional journey time which would not be sustainable; 2.It would increase the volume of traffic which would have a detrimental effect on the neighbouring hamlet of Calmsden and would impact on the potential residential use of Old Gore Barn, which is situated to the south of Foss Cross; 3.The site is successfully used as a recycling centre and the small area currently used for this purpose would not readily adapt to the treatment of waste. Most of the industrial estate is occupied by a number of successful local businesses which could be adversely affected by excessive traffic, noise and smell; 4.The site is in an AONB and is just south of a SSSI. The landscape aspect of a development would be detrimental; 5.My farm, which surrounds the site, is about to join the Higher Level Scheme run by Natural England and the development of the site for treatment of waste could markedly change the profile of birds adjacent to the site. The on farm habitats are tailored to specific birds as part of the Farmland Bird Project and a waste treatment site would have a damaging effect through encouraging vermin and corvids; 6.There is seepage of methane from the old landfill site just north of the recycling centre which indicates there is a significant risk of contamination of the land already. In summary the site is successfully used as a recycling centre which uses the available area to its maximum. There would be no further room for the treatment of residual waste or transfer of organic waste at Foss Cross. I therefore urge you NOT to include this site for the treatment of residual waste, both residential and commercial.

10. Officer Response.

Comments noted. Dealing with each in turn. Whilst the Council's preferred strategy is to provide strategic waste management facilities within Zone C, there may be a role for sites outside this area e.g. smaller scale provision or supporting infrastructure such as waste transfer. In terms of traffic, PPS10 should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. In terms of the existing use of the site, the re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community. Odour and noise are matters that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any 'sensitive receptors'. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning conditions. In terms of development within the AONB, national policy does not prevent development within the AONB. It does, however, demand that the need for such development can be demonstrated and that the development is carried out to high environmental standards. Any potential impacts from development on the adjoining areas of farmland would need to be considered through an environmental assessment at the planning application stage should a detailed proposal come forward. Existing contamination of the site would also be considered. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. This site will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 429 Type IND Name Everard Turnmonkey Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

It is not at risk from flooding and is well served by logitic links and so makes reasonable sense

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

I am not familiar with any of these sites

4. Officer Response.

Noted.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

6. Please give a reason for your answer to Question 5.

Don't understand the question or the explanation!

6. Officer Response.

Comment noted. The consultation question asked for views on whether waste treatment facilities should be included as part of the development of new 'urban extensions' to Gloucester and Cheltenham i.e. planned growth on the edge of these two settlements. Significantly however, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a waste treatment facility or facilities as part of those proposals. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

Number 429 Type IND Name Everard Turnmonkey Organisation not applicable/not provided

7. Do you support the identification of sites outside Zone C?

I do not support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

The further off the existing zone C activity is spread the worse the environmental impact and the greater the logistical problems

8. Officer Response.

Comment noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester		X	
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

I am reasonably familiar with the Fosse Cross site and extension of its role makes no sense in the context of the strategy

10. Officer Response.

Comment noted. Whilst the Council's preferred strategy is to provide strategic waste management facilities within Zone C, there is likely to be a role for sites outside this area e.g. smaller scale provision or supporting infrastructure e.g. waste transfer. The Foss Cross site fulfils a number of criteria that make it suitable for consideration including location, size, flood risk, highways, availability and so on. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. This site will therefore not be taken forward into the publication WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I do not support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

See answer to q8

12. Officer Response.

See previous response.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

Nope

13. Officer Response.

Number 429 Type IND Name Everard Turnmonkey Organisation not applicable/not provided

Noted.

14. Do you have any comments on the Executive Summary?

Nope

14. Officer Response.

Noted.

15. Do you have any comments on Section 1?

Nope

15. Officer Response.

Noted.

16. Do you have any comments on Section 2?

Nope

16. Officer Response.

Noted.

17. Do you have any comments on Section 3?

Yes the options outside Zone C are not well argued.

17. Officer Response.

Comment noted. As stated in the consultation paper, the Council's preferred strategy is to focus the search for strategic municipal waste sites primarily on the area defined as 'Zone C'. 10 sites were duly identified within this zone. In order to ensure an appropriate degree of flexibility, to reflect the fact that sites don't always come forward as expected and to ensure adequate provision is made for any additional facilities that may be needed to support the Zone C sites, 3 sites were identified outside Zone C. This approach is clearly explained in the site options consultation paper.

18. Do you have any comments on Section 4?

No

18. Officer Response.

Noted.

19. Do you have any comments on the Sustainability Appraisal reports?

No

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

It's a waste of effort, the wildlife will look after itself as it has always done!

20. Officer Response.

Comment noted. The application of Habitat Regulations Assessment is a statutory requirement.

Number 117 Type IND Name Andrew Turrall Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Given the technologies available, and the size of the County, it makes sense to have a network of small, local facilities which process the waste where it is produced. Looking at the map, it seems disingenuous to suggest that Zone C avoids flood plain. It adjoins it along its length.

2. Officer Response.

Comment noted. At the present time the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. In terms of a network of small, local facilities the council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the county. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. The advantages and disadvantages would be investigated further during procurement process. In terms of flood risk, whilst Zone C does include some areas of floodplain, it avoids the most extensive area of floodplain which is located in the western part of the County. All sites included in the site options consultation paper were subjected to a strategic flood risk assessment (SFRA) which confirmed they are not located in a flood risk area. Any proposal of more than 1 hectare in size, would in any case need to be supported by a site-specific Flood Risk Assessment (FRA).

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield		X	
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence		X	
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works		X	
10. The Park, Wingmoor Farm West			X

Number 117 Type IND Name Andrew Turrall Organisation not applicable/not provided

4. Please give a reason for your answers to Question 3.

The main problem is the smells, gases and particulates which would be released into the air by any method of large scale waste disposal. Javelin Park, despite your report, is surrounded by housing. Stonehouse to the South East, Hardwicke to the North-West and the Kingsway and proposed Hunts Grove development to the North. Similar considerations apply to Quadrant Business Centre. A further problem is the additional traffic which would be generated: large part of Hardwick and Quedgeley are gridlocked at certain times of the day. To say nothing of the appallingly designed M5 Junction 12. Similar considerations apply to Moreton Valence. The smell from the Netheridge treatment works is frequently strong to the point of being unbearable. Further fumes and particulates would be intolerable.

4. Officer Response.

Comments noted. Dealing with each in turn. In terms of smells, gases and particulates, PPS10, states that 'modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health'. Odour is a detailed matter (along with issues such as dust and noise) that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any 'sensitive receptors'. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning conditions. In terms of proximity to housing, clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10 , which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. With regard to traffic generation, PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Disagree

6. Please give a reason for your answer to Question 5.

Plans such as these which depend on extrapolations of data which may be spurious, and on assumptions which may change markedly in the short term, should be given a low weighting compared with the actual physical infrastructure.

6. Officer Response.

Comment noted. The WCS has a role to play in ensuring all new development is underpinned by appropriate waste management infrastructure (e.g. recycling facilities). The site options consultation paper however focuses on identifying a site or sites suitable for accommodating a strategic waste management facility and there has been no interest from either waste operators or the developers leading the urban extensions in providing this type of facility as part of the development. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of

Number 117 Type IND Name Andrew Turrall Organisation not applicable/not provided

strategic waste sites within the urban extensions. Should any such developments go ahead their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

This is a loaded question. I do not support your contention of the need for main sites in zone c but I do believe that sites outside this zone should be considered.

8. Officer Response.

Comment noted. The rationale behind Zone C is that, it is consistent with national and regional policy, it includes Gloucester and Cheltenham where most of the waste currently arises and it includes areas where there is likely to be a significant amount of housing growth. It also avoids the floodplain and the AONB and has good transport links. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

Insuffucient local knowledge

10. Officer Response.

noted

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

I believe that optimum solution is a network of localised sites, using appropriate technologies, which process locally produced waste, which minimising environmental damage locally, and also minimising the movement of waste on the County's roads

12. Officer Response.

Comment noted. The Council has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the county. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability.

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The Publication WCS identifies four strategic allocations within Zone C. Proposals on other sites should there prove to be market demand, will be considered on their merits against relevant criteria.

14. Do you have any comments on the Executive Summary?

The executive summary pays lip service to the ideas of recycling and composting. In fact, the facilities for these purpose - both kerbside and in fixed locations - vary wildly between districts across the County and are woefully inadequate. This problem needs to be addressed as an urgency as a forerunner to any waste strategy for the County. The preferred options consultation of 2008 is mentioned. This consultation seems to have been one of the best kept secrets of the new millennium. We were certainly only aware of it after the event!

14. Officer Response.

Comments noted. The site options consultation focuses on sites for residual waste treatment. This is the waste leftover after recycling and composting. The Publication WCS sets out the Council's approach towards recycling and composting facilities. The various collection arrangements in place in each District are not within the scope of the WCS. Such issues fall into the remit of the Gloucestershire Waste Partnership. In the longer-term there is the prospect of a more 'joined-up' solution being found. The preferred options consultation in 2008 was consulted upon in line with the Council's adopted Statement of Community Involvement (SCI).

16. Do you have any comments on Section 2?

The waste hierarchy diagram is very in structure and laudable. However it has no relevance to the current paper which does not address these issues. PPS10: the four sites which I have marked as unsuitable in question 3 score very badly on the majority if criteria in paras 2.8 and 2.9, on any objective measure. Para 2.11 The National Waste Strategy 2007 is very laudable but I do not see the relevance to the current paper.

16. Officer Response.

Comment noted. A key component of the waste hierarchy is recovering value or energy from waste. The purpose of the consultation is to identify sites suitable for this process. The hierarchy is therefore of direct relevance to the consultation. The criteria set out in PPS10 are one of a number of factors that have been taken into account in determining the preferred strategy and individual sites identified in the consultation paper. The National Waste Strategy seeks amongst other objectives to divert waste from landfill. As set out above the sites identified are intended to achieve this by providing waste treatment facilities.

17. Do you have any comments on Section 3?

The arguments are self-consistent, but they are based on two questionable assumptions; that the sites must be large, that the sites must be in zone c. I do not believe that you have justified either of these assumptions.

17. Officer Response.

The sites identified in the site options paper are those of more than 2 hectares in size and able to handle at least 50,000 tonnes per annum of waste. As explained in the paper, these thresholds are based on other planned and existing municipal waste facilities in the UK. They also reflect the definition of 'strategic' in the adopted Waste Local Plan and a number of studies on potential facilities requirements for different types of waste technologies. It should not be assumed that economies of scale mean an inflexible solution. GCC recognises that regardless of the type of solution proposed, it is important that the solution must be able to cope with changes in waste volumes and composition, as it is inevitable such changes will happen. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. Flexibility is a separate sub-criterion within Operational, Service and Technical Deliverability. This will be addressed throughout the process and is recognised as a key factor for the project. Zone C is based on national and regional policy and will allow for most of Gloucestershire's waste to be treated close to source. Zone C is the preferred focus for the location of strategic waste management facilities however as acknowledged in the consultation paper, sites may be needed outside this area to provide flexibility and contingency and to ensure adequate provision is made for any additional facilities that may be needed to support Zone C. The focus on Zone

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C received a good level of support in response to the site options consultation (50% of respondents favouring this approach).

18. Do you have any comments on Section 4?

4.10 - your policy of 'see what the market will provide' seems both naive and open to abuse. It is also a well tried mechanism for 'passing the buck'. 4.16 - given the location of a large number of your proposed sites, it seems incredible that Stroud DC is not involved in the Joint Core Strategy (JCS)! 4.35 - we shall monitor your results with close interest. However appendix 5 is a document fully of woolly and pious hopes, and I do not believe it is a document on which I could do a professional job of monitoring progress

18. Officer Response.

Comments noted. Although the WCS is linked to the Council's residual waste project, the purpose of the WCS is to provide a clear and separate framework against which the merits of any scheme that comes forward through the residual project will be assessed at the planning application stage. The WCS preferred strategy of focusing strategic waste facilities on 'Zone C' has been developed through consultation with a broad range of stakeholders including the waste industry and is consistent with a range of national, regional and local policy. Importantly, it is not a market-led strategy. In terms of the Joint Core Strategy, Gloucestershire County Council has no influence on the decision to exclude Stroud District from the process. The location of the 13 sites identified in the site options consultation paper is also incidental to this decision. Appendix 5 is provided for illustrative purposes and represents one way of measuring the implementation of policies and proposals contained in the WCS. The baseline information, policy targets and indicators are derived from established international, national, regional and local plans and programmes designed to facilitate monitoring. Appendix 5 has been worked up in more detail in the Publication WCS.

Number 434 Type IND Name M Tyack Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I strongly object to the proposed Allstone site being used to process commercial and industrial waste, it only seems a while ago that we were objecting to them using the site for other waste, (which was overturned) and now when one walks across to the hospital or the garage shop, the lorries are more or less continual, (skip lorries, cement and normal lorries) and the dust they cause as they thunder past is very noticeable, what was once a lovely peaceful area is being turned into a lorry track!! The lord only knows what it will be like if they get permission! How will Horton Road cope with all the traffic, often cars go to the hospital and the school areas are very busy with coaches at certain times, stagecoach also run a bus service to the hospital. This is a dreadful proposal, disruptive to the people who live on Swallow Park estate, allstones has blighted the area as it is!!

17. Officer Response.

Comments noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. With regard to Site 7, the site has not been taken forward into the publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 350 Type IND Name Donna Valentine Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

The site I am concerned about is north of triangle, I feel this site is far too close to a residential area.

2. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. In relation to Site 7, Land North of Railway Triangle, notwithstanding the above, the site has not been taken forward into the publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
7. Land north of Railway Triangle, Gloucester		X	

4. Please give a reason for your answers to Question 3.

Too close to residential area, already noisey, very dusty.

4. Officer Response.

Comment noted. Please see previous response on Site 7, Land North of Railway Triangle.

Number 413 Type IND Name Rinengi Varte Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Most of the County's waste comes from Gloucester and Cheltenham and the Central Severn Vale is well served by the M5 and other strategic roads.

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X		
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre	X		
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park	X		
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West			

4. Please give a reason for your answers to Question 3.

Reducing waste to landfill is important and a well run facility on this site that contributes to addressing this issue would potentially not be a problem. However, there are better sites available and it is clear that the problematic Myers Road access/junction and the local roads skirting the hospital are not suitable. The site could be acceptable if a new road was constructed from Metz way.

4. Officer Response.

Comment noted. The WPA is clearly in agreement with the need to reduce the amount of waste sent to landfill and the need to to identify sites for facilities to achieve this. In relation to Site 7, Land North of Railway Triangle, since the site options consultation was undertaken in October 2009, the Waste Planning Authority has carefully considered all the issues related to this site. The site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that

Number 413 Type IND Name Rinengi Varte Organisation not applicable/not provided

the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the Publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Agree

6. Please give a reason for your answer to Question 5.

It would make perfect sense to build CHP into new development.

6. Officer Response.

Support noted. The integration of waste management facilities into the urban extensions would provide the opportunity to link new development through CHP. However, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

A dispersed approach has some advantages in terms of helping communities to take more responsibility for the waste they produce. In reality this is likely to be expensive, and the waste industry will not favour it. However, it may well be an approach for the future as levels of residual waste drop.

8. Officer Response.

Comments noted. PPS10 does support communities taking responsibility for their own waste. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney	X		
3. Land at Lydney Industrial Estate, Lydney	X		

10. Please give a reason for your answers to Question 9.

They could all be suitable for small scale facilities or for transfer. The use of water transport from Lydney docks should not be discounted - every opportunity to get freight off the roads should be encouraged.

Number 413 Type IND Name Rinengi Varte Organisation not applicable/not provided

10. Officer Response.

Comments noted. Whilst the Council's preferred strategy is to provide strategic waste management facilities within Zone C, there is likely to be a role for sites outside this area e.g. smaller scale provision or supporting infrastructure e.g. waste transfer. The potential for sustainable transport is acknowledged subject to viability. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. These sites will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the sites forward as allocations at this stage does not mean that the sites are unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.,

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

A combination approach may prove to be the most suitable / flexible.

12. Officer Response.

Support noted.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No.

13. Officer Response.

Noted.

14. Do you have any comments on the Executive Summary?

No.

14. Officer Response.

Noted.

15. Do you have any comments on Section 1?

No.

15. Officer Response.

Noted.

16. Do you have any comments on Section 2?

No.

16. Officer Response.

Noted.

17. Do you have any comments on Section 3?

No.

17. Officer Response.

Noted.

18. Do you have any comments on Section 4?

Number 413 Type IND Name Rinengi Varte Organisation not applicable/not provided

In terms of deliverability i.e. the link to the Council's Residual Project, decisions on technology should be primariliy and strongly focused on reducing climate change impacts. The solution should be as flexible as possible and well able to adapt to rapid technological and societal changes.

18. Officer Response.

Comment noted. It is important to note that the deliverability and implementation framework will address all WCS policies, not just those relating to site allocations. Although the issue of strategic site allocations for the treatment of municipal waste is linked to the residual project, there are a number of other factors influencing deliverability and implementation. The publication WCS delivery framework will be expanded to include all aspects of the WCS including general policies on issues such as waste minimisation. In terms of technology, at the present time the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. Importantly, the type of technology chosen has no direct bearing on the delivery and implementation element of the WCS (the principles of which will apply regardless of which technology or technologies come forward).

19. Do you have any comments on the Sustainability Appraisal reports?

No.

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

No.

20. Officer Response.

Noted.

Number 183 Type IND Name Sarah Viall Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

If it is for the waste of the whole of Gloucestershire then surly the whole of Gloucestershire should be considered.

2. Officer Response.

Comment noted. It is essential that the WCS provides a clear strategy for the location of new waste management facilities. The designation of Zone C is consistent with national and regional policy and reflects the fact that most of Gloucestershire's waste is produced at Gloucester and Cheltenham. The Publication WCS includes four strategic site allocations within Zone C. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X	X	
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West			

4. Please give a reason for your answers to Question 3.

The areas which I feel are no suitable are in very close proximity to housing, and the sites have not been used for waste disposal in the past, unlike Wingmoor Farm where the local area has been used for waste disposal for a number of years and many of the local property and business owners would have been aware of this before purchasing their property. I am particularly against the proposed development of Easter Park, as it is very close to my home in Saxon Park. I am very concerned about the potential noise and air pollution that this proposed development may bring. I feel it will increase the levels of traffic on an already busy main road, which, as your proposal states does already suffer from traffic jams during peak periods. I would also like to point out that the site is less than a mile away from 4 schools, which heightens my concerns regarding the increased traffic and potential pollution.

4. Officer Response.

Support for Wingmoor Farm sites, Javelin Park, Netheridge and Moreton Valence noted. In terms of proximity to housing, clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed

Number 183 Type IND Name Sarah Viall Organisation not applicable/not provided

of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. In terms of sites having previously been used for waste use, although the use of existing waste facilities is consistent with Government policy, this does not preclude other sites being looked at including previously developed employment sites such as Easter Park. Noise is a detailed matter that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any 'sensitive receptors'. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning conditions. With regard to air pollution it should be noted that planning and pollution control regimes are separate but complimentary. Pollution control is concerned with preventing pollution whilst planning controls the development and use of land. Waste planning authorities are expected to work on the assumption that the relevant pollution control regime will be properly applied and enforced. PPS10, states that 'modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health'. In terms of traffic impact, the site has been subjected to an initial highway assessment which considered it suitable for inclusion in the site options consultation paper. Indeed, the assessment suggests that a waste use on this site could actually generate less traffic than an employment use which could come forward under the existing planning permission for the site. There are no schools within close proximity (250m) of the site. Notwithstanding the above, the site has not been taken forward into the Publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Disagree

6. Please give a reason for your answer to Question 5.

If the expansion is for residential housing then I don't this waste disposal sites should be included for the reasons I have stated above. However if it is for business use then yes it should be considered.

6. Officer Response.

Comment noted. The WCS has a role to play in ensuring all new development is underpinned by appropriate waste management infrastructure (e.g. recycling facilities). The site options consultation paper however focuses on identifying a site or sites suitable for accommodating a strategic waste management facility and there has been no interest from either waste operators or the developers leading the urban extensions in providing this type of facility as part of the development. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead their waste management requirements will be addressed through the general policies and requirements of the WCS.

Number 183 Type IND Name Sarah Viall Organisation not applicable/not provided

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

All of Gloucestershire produces the waste therefore all of Gloucestershire should be considered - 2 smaller sites may reduce the impact of the proposed development. If the waste has a shorter distance to travel then surely that will cut down on co2 emissions?

8. Officer Response.

Comments noted. Reduction of CO2 emissions is clearly an important consideration. The Publication WCS focuses on Zone C and includes four strategic site allocations within this area. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

No O/S map on the proposal to see the local area.

10. Officer Response.

Comment noted. The site options consultation paper included a detailed site schedule for each of the 13 potential sites including the three outside Zone C. Further information was made available in the supporting evidence base.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

All of Gloucestershire produces the waste therefore all of Gloucestershire should be considered - 2 smaller sites may reduce the impact of the proposed development. If the waste has a shorter distance to travel then surely that will cut down on co2 emissions?

12. Officer Response.

See previous response to Question 8.

14. Do you have any comments on the Executive Summary?

DON'T AGREE TO EASTER PARK!!!

14. Officer Response.

Comment noted. See previous response to Question 4.

Number 75 Type IND Name L G Virgo Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch		X	
4. Javelin Park, Haresfield		X	
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence		X	
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works		X	
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

I wish to express my objection to the use of any of the sites listed for positioning of waste disposal sites. Any could be used for incineration which may well create flying toxic ash to pollute the immediate atmosphere. Even if transported elsewhere it will affect the local inhabitants in small villages and farms and other dwellings roundabout. I understand such sites may carry contracts for 24 years at least which does not take into account any change of the general behaviour, nor of any more effective technology which hopefully is being developed. I believe that something called mechanical biological treatment is a method which is a better alternative to the dangers of incineration, and found to be so in other areas of the Country.

4. Officer Response.

Comment noted. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of

Number 75 Type IND Name L G Virgo Organisation not applicable/not provided

projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 241 Type IND Name V Virgo Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I wish to add my protest to those of others about the proposed siting of the waste disposal incinerator at Javelin Park, Haresfield. For waste from such a largte area to be brought continually ti within sight and smell of a number if small villages, whose residents include a number of children, would, I am assured, would have a most hazardous effect on a considerable number of people. A site where the inevitable increase of heavy traffic, as well noise and smell will affect fewer people can surely be found.

17. Officer Response.

Comments noted. Dealing with each in turn. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. In terms of health impact, PPS10, states that 'modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health'. Furthermore, the detailed consideration of a waste process and the implications, if any, for human health is the responsibility of the pollution control authorities. PPS10 also states that, where concerns about health are raised, waste planning authorities should avoid carrying out their own detailed assessments rather they should ensure, through drawing from Government advice and research and consultation with the relevant health authorities and agencies, that they have any advice on implications for health..' The WPA duly sought the advice from the PCT/NHS through the site options consultation. In terms of traffic impact, PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. For Javelin Park, the assessment suggests a likely net decrease in traffic and highlights the very good trunk road accessibility of the site. Potential impacts on Junction 12 of the M5 will need to be explored should a detailed proposal come forward. Any strategic site allocation made in the publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. Odour and noise are matters that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any 'sensitive receptors'. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning conditions. In the case of Javelin Park there is only one property within 250m of the site, with the nearest settlement Haresfield being approximately half a mile away.

Number 76 Type IND Name R Wager Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
2. Areas A, B & C at Wingmoor Farm West		X	

4. Please give a reason for your answers to Question 3.

As Documented in your, Waste Core Strategy Site Options Consultations. I wish to put forward my objection to the proposed development of sites at Wingmoor Farm West Tewksbury Borough. In your above document it states the area is in green belt. The area will suffer from an increase in traffic, with an impact on stoke orchard village. Other sites listed are vacant with better access to major roads. There is sufficient landfill activity already in the area Cheltenham and district gun club is the only site with activity on, with no Provision for its continuation if land is used.

4. Officer Response.

Comments noted. Dealing with each in turn. Whilst it is acknowledged that the Green Belt should generally be protected, PPS10, emphasises that local authorities should 'recognise the particular locational needs of some types of waste management facilities when defining detailed green belt boundaries and, in determining planning applications'. In line with PPS10 companion guidance, should any sites within the Green Belt be specifically allocated within the WCS, it will need to be clearly indicated that they are for waste management purposes only. PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. For the Wingmoor sites the assessment flagged up some capacity issues which may need to be addressed e.g. through junction improvements. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. Lorries are current banned from turning accessing the Wingmoor sites via Stoke Orchard and any new planning permission would be unlikely to change this arrangement, therefore it is unlikely that additional traffic movements through Stoke Orchard would be generated as a result of such a site. Whilst there is existing landfill activity at Wingmoor West and East, the site options consultation does not relate to these facilities. The purpose of the consultation is to identify sites suitable for the development of a waste treatment facility. It is important to note that the use of existing waste management facilities is consistent with national policy however regard must be had to the cumulative effect of previous waste disposal facilities on the care and well being of the local community including any significant adverse impacts on environmental quality, social cohesion and inclusion or economic potential. PPS10. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the 'inclusion criteria' for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that his site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management

Number 76 Type IND Name R Wager Organisation not applicable/not provided

purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 74 Type IND Name Roma Walker Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
8. Nastend Farm, Stroudwater Business Park		X	

4. Please give a reason for your answers to Question 3.

I attended the exhibition at Stonehouse recently, in connection with the possible sites of waste management in this area. Having been a resident of Nupend for the past 30 years surrounded by fields, woods and farms, and enjoying the peace and quiet in this historic village. So you can imagine my horror at the threat of waste being transported from other areas and sent for possible incineration within this area. I must oppose all these options as being totally unacceptable.

4. Officer Response.

Comment noted. The WPA is aware of the rural nature of the area to the north of Stroudwater Industrial Estate / Business Park and is also aware of the biodiversity sensitivities in the wider area. Site 8 is currently agricultural land, but crucially it is allocated for employment use in the Stroud Local Plan. The Waste Planning Authority has carefully considered all the issues on this site. The site has not been taken forward into the publication WCS because although the County Council is the landowner, following discussions with the County Council's Waste Disposal Authority (WDA) it would appear that there is significant uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore, the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 269 Type IND Name A R Walker Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I would like to register my objection to the use of Area C at Wingmoor farm west as a possible site for the new waste treatment plant. The site is already being used as a very successful sporting facility and has been for many years. There is a membership of over 200 and a waiting list. The club has spent time and money to improve the area over the years. We have planted hundreds of trees and brought the scrub under control. Our rent has always been paid on time and we consider ourselves to be excellent tenants. Other of the sites listed appear to be more suitable vacant and with better access to major roads. The locality already suffers much traffic seven days a week.

17. Officer Response.

Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the inclusion criteria for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that this site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 111 Type WOP Name Katy Wallis Organisation Grundon Waste Management

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Focussing search for strategic waste facilities on the area defined as Zone C is supported as this zone is sustainably located in close proximity to both the M5, thereby providing good transport links, and to waste arisings from the Gloucester, Cheltenham and Tewkesbury areas.

2. Officer Response.

Support noted

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		

19. Do you have any comments on the Sustainability Appraisal reports?

Information from the Stage 1 Sustainability Appraisal for Wingmoor Farm East has, apparently, been carried over to the Stage 2 Sustainability Appraisal without having been up-dated. It is considered that the response to SA Objective 6 (Employment Opportunities) does not reflect the current position whereby the pedestrian and cycle links from Bishop's Cleeve have been up-graded along the northern side of Stoke Road/Stoke Orchard Road to opposite the entrance to the MRF. Therefore, the scope for non-car access to Wingmoor Farm East has been substantially enhanced. With respect to Site A within Site Number 1 (Wing moor Farm East), the appraisal is based on the assumption that a new building would be constructed rather than the possibility that the existing building (MRF) could be used for residual waste facility (non thermal treatment), albeit with some additional low level development. As a result, it is considered that the potential landscape impacts identified for Area A are listed as more adverse than they should be. As a minor point, there appears to be some confusion in the Stage 1 Sustainability Appraisal regarding SA Objective 11: Material, cultural and recreational assets as applied to Sites 272 (Wingmoor Farm West) and 561 (Wingmoor Farm East); this confusion has then been carried over to the Stage 2 SA. The text in the Stage 1 SA under SA Objective 11 for Site 272 states: 'there may be leisure/recreational facilities within 250m of the site, including a rugby ground and rifle range and there could be potential minor negative effects on leisure and recreational activities assets in the County by making these facilities less attractive for users'. This comment is repeated almost verbatim in the Stage 2 SA. With respect to Wingmoor Farm East, in the Stage 1 SA under SA Objective 11, it states there is a park, civic amenity site and areas of non-coniferous trees to the west of the site with potential for significant negative effects on recreation activities'. This is repeated almost verbatim in the Stage 2 SA. The rugby ground is to the east of Wing moor Farm East whilst the park, civic amenity site and areas of non-coniferous trees, and rifle range are to the west of the site, to the west of the railway line, and associated more with Wingmoor Farm West. Given the apparent confusion as to the location of these recreational facilities, it is considered that the extent of any adverse effects on leisure and recreational activities should be re-assessed for both Wing moor Farm East and West.

19. Officer Response.

Comments on SA Objective 6 and the landscape assessment are noted. Updates can be made as appropriate. It is clear where the various recreational facilities in the vicinity of Wingmoor Farm East and Wingmoor Farm West are, but some confusion may have resulted from the Stage 1 SA assessing 2 wider cluster sites: (No.561 Wingmoor East and No.272 Wingmoor West), and then the Stage 2 SA Report considering the smaller areas within Site 1 and Site 2 in the consultation document (Pages 30 and 32). Updates can be made as appropriate. The fact remains that, in relation to the Grundon site (Wingmooor East) Area A is very close to the rugby ground and the northern part of Area C is and the western part of Area B are within 250m of the Clay Pigeon Range (not to be confused with the rifle range next to 'The Park -Industrial Estate'. These are factual statements and it may well be the case that, due to the significant waste management areas that already exist (e.g. landfill) these recreational activities (especially the shooting) may not suffer significant impacts as a result of activities at Wingmoor East.

Number 371 Type IND Name Elaine Waterson Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
4. Javelin Park, Haresfield		X	

4. Please give a reason for your answers to Question 3.

I write to object to the use of Javelin Park, Haresfield, as one of the sites listed for possible waste treatment in Gloucestershire on the grounds that: - I oppose incineration. - Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. - The area surrounding Javelin Park is rural and has a number of farms within it, providing milk and meat to the public; any build up of toxins will be ingested by livestock and passed on through the food chain. - The area is prone to fog and is surrounded by hills, preventing the safe dispersal of incinerator emissions and potentially allowing the build up of heavy metals. - I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. - The long term costs to the taxpayer will be higher with incineration. - Incinerators act as a disincentive to reduce, reuse and recycle. - Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. - Large incinerators in other areas of the country are already deemed to be a mistake.

4. Officer Response.

Comments noted. In terms of incineration, the Council is currently technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10 which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. With regard to health impact, PPS10 states that modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health. Furthermore, the detailed consideration of a waste process and the implications, if any, for human health is the responsibility of the pollution control authorities. PPS10 also states that, where concerns about health are raised, waste planning authorities should avoid carrying out their own detailed assessments rather they should ensure, through drawing from Government advice and research and consultation with the relevant health authorities and agencies, that they have any advice on implications for health. The WPA duly sought the advice from the PCT/NHS through the site options consultation. In terms of contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces.

Number 320 Type PC Name Sue Watson Organisation Lydney Town Council

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I'm not sure/I don't know

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

7. Do you support the identification of sites outside Zone C?

I do not support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

Our Council wishes to object to the possible creation of a waste treatment site in our town at either proposed location. We have listed our objections under our response to question 10.

8. Officer Response.

Comment noted. It is essential that the WCS provides a clear strategy setting out what will be built and where. This will provide certainty and confidence to the development industry and help bring proposals forward. The Council's preferred strategy is to focus the location of new strategic waste management facilities in the area defined as Zone C. This approach is considered to be consistent with national policy (PPS10) and the Regional Waste Strategy. Although the preferred focus for strategic waste management is Zone C, a number of other sites were identified outside this zone in the Forest of Dean and Cotswold District in order to provide suitable flexibility and support for the Zone C sites. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
2. Hurst Farm, Lydney		X	
3. Land at Lydney Industrial Estate, Lydney		X	

Number 320 Type PC Name Sue Watson Organisation Lydney Town Council

10. Please give a reason for your answers to Question 9.

1) Lydney is close to an area of outstanding natural beauty and is the only town in the forest to possess its own Docks. The Docks are situated in Harbour Road and are listed as a Scheduled Ancient Monument. Officers from the Forest of Dean District Council, the Environment Agency and other partner organisations are currently working on plans to regenerate both the Docks and the surrounding areas, and our Council is concerned that the County Council's plans to locate a waste treatment site in Harbour Road could have a detrimental effect on both the regeneration plans, and also the level of tourism currently experienced by the Docks. 2) Our Council is concerned about the increased level of traffic on the A48. The A48 is struggling to cope with the existing volume of traffic and members fear that this, linked with the planned residential development of in excess of 1,000 houses, will be too much for the current infrastructure to bear. Councillors believe that the current infrastructure for the town should be substantially improved and this is an issue that the Council has raised several times with officers from the Transport Department at Gloucestershire County Council. However, the County Council has always argued that it did not possess sufficient finance to improve our town's infrastructure, but it appears that it is now able to finance the creation of a totally new waste treatment site in the town, with no consideration given towards firstly addressing our longstanding requests for improvements.

10. Officer Response.

Comments noted. Dealing with each in turn. With regard to the AONB, Lydney is actually someway distant from both the Wye Valley AONB and the Cotswolds AONB. It is acknowledged that there needs to be constructive compatibility with WCS and the emerging plans for Lydney Docks and the surrounding area. There is however nothing to suggest that a modern waste management facility would have any more of an impact on regenerating the Docks than the existing industrial and commercial uses located on Lydney Industrial Estate. The comments concerning the potential increase in traffic on the A48 are noted. PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. For the Lyndey sites, the assessment was fairly positive with a medium score in terms of access to the strategic road network and a high score in terms of the potential for sustainable transport use. The comments about the general state of the infrastructure in Lydney are outside the scope of the WCS. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I do not support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

Our Council totally rejects the possible creation of a waste treatment site in our town in either of the proposed locations.

12. Officer Response.

Comment noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 439 Type ENV Name Alan Watson Organisation Gloucestershire Friends of the

17. Do you have any comments on Section 3?

This submission is made on behalf of Gloucestershire Friends of the Earth Network. The consultation documents are voluminous (1,297 in the composited version!) and it has not been possible to consider all the material in detail. The key concerns in relation to the current selection process include: The assumptions underpinning the determination of need for major sites, the falling waste arisings, the reliability of the data upon which the site assessments - particularly for potential combined heat and power users, errors in the assessment of sites with restoration conditions. Alternative approaches. The Assumptions underpinning the determination of need for major sites: It is appreciated that this consultation is focussed on the site selection. The selection of sites cannot, however, be sensibly undertaken in the absence of a proper determination of the need for various facilities. Our previous submissions on behalf of the Gloucestershire Friends of the Earth Network has highlighted some of the concerns about the data used in the waste core strategy. I will not repeat those submissions here save to say that they have been reinforced by the passing of time and that there are a few key issues which should be raised in the context of the site specific process. The basis for the site selection process is that the Authorities target is to recycle and compost at least 60% of our household waste. This is the target in the JWMS (Gloucestershire Waste Partnership 2008). The target data is set as 2020. It is described (at para 2.37) as an ambitious target'. It is shown below that there are already authorities in the UK exceeding this target level and that a more accurate description for a 2020 target date might realistically be 'pedestrian'. The JWMS also aims to reduce household waste growth to zero by 2020 - although the 2007 Waste Core Strategy Technical Paper WCS-A on Waste Data (Gloucestershire County Council 2007) still relied upon in the current consultation includes growth rates of 1.65 pa through to at least 2027/28. This growth rate is almost certainly too high and seriously distorts the real need for treatment capacity. The JMWMS projections (fig 6, page 14) are: (see separate attachment) Municipal waste produced/arising in the County for April 2007 to April 2008 were 322,796 tonnes. Figures published in November 2009 (DEFRA 2009) showed that by 2008/9 the MSW arisings had fallen to 308,938 tonnes. Thus whilst the JMWMS was published and adopted relatively recently the current level of arisings are already c.10% lower than the projected 'best case' scenario in this graph - in line with the warnings from Friends of the Earth and others that the growth rate assumptions were too high. It is likely that the divergence will increase over time and it is disappointing to see that the same flawed 'predict and provide' approach is carrying on unchanged. The consultation document claims that 'even if we manage to achieve this there will still be at least 150,000 tonnes of leftover 'residual' household waste to deal with each year' and thus: '3.5 In order to fulfil the Council's forecast capacity requirements, the site, or combination of sites will have to be able to handle at least 150,000 tonnes of municipal waste per year'. The consultation document even goes on to suggest (para 3.8 page 24) that the 'amount of residual waste having to be treated could however be as much as 270,000 tonnes per year'. If an NGO was to make such an exaggerated claim based on such poor evidence then they would, quite rightly, be ridiculed. It is disappointing to see such exaggerated and poorly founded suggestions in a consultation document this far into the WCS process. The inclusion of a figure that is so unrealistic demonstrates a profound lack of understanding of waste generation in the context of the current and emerging policy and sustainability framework. Falling Waste Arisings Surrey County Council has very recently dropped plans for two new incinerators which it had enthusiastically promoted for the past decade as being essential to waste management in the County. Surrey will instead promote further recycling and work with its waste contractor, Surrey Waste Management, to develop a smaller gasification plant and anaerobic digestion (AD) facilities for food waste. It is notable that the two plants are expected to cost £50m which is £150m less than the two incinerators. The council's original plans were based on achieving household recycling rates of 60% by 2020 - the Gloucestershire target for 2020 - yet some Surrey districts have already managed this. Some UK authorities have already gone even higher, particularly in the summer with 70%+ recycling being achieved by at least two districts in England (South Oxfordshire and Rochford) (ENDS 2009). There is no evidence that the rapid increase in recycling nationally has peaked. The national recycling rate for household waste in England now stands at 37.6% in 2008'9, an increase of 3.1% on the previous year. This rise is only slightly lower than the increase of 3.6% in 2007-8 and the 4.2% in each of the two years prior to that. 2.9 During this time, the amount of waste collected from household sources has decreased by 3.8 % from 25.3 million tonnes in 2007-8 to 24.3 million tonnes in 2008-9. The average annual change in total household waste over the past five years has been a decrease of 0.9% pa. Surrey will now aim for 70% recycling by 2013, the same target as Wales and Scotland. It also hopes to reduce household waste arisings by 35,000t below current volumes and to have stopped landfilling household waste by the same date. Alternative Approaches: The likely underestimation of existing capacity was examined in some detail in our previous response - along with the possibility that some of the under utilised C&I waste capacity could be

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available for municipal waste. It is worth summarising the situation, however, in the light of the latest Annual Monitoring Plan (Gloucestershire County Council 2009): (please see seperate attachement) Need is taken from figure 5 of the consultation document Current capacity is from the Annual Monitoring Report It is clear; therefore, that for most aspects of MSW there is ample capacity. Indeed the full use of the existing windrow and in-vessel composting together with the current recycling target levels would allow the requirements of the landfill directive to divert biodegradable waste from landfill to be met without further capacity. In these circumstances it is more important to get residual treatment right than to rush into expensive strategic 'solutions' that risk being over-sized and thus promote environmentally damaging transfers of waste from outside the County. I note that in May 2009 the High Court1 ruled in favour of a challenge to the East of England RSS, brought by Hertfordshire County Council and the City and District Council of St Albans that that SA failed to test 'reasonable alternatives' to specific proposals. The Court has subsequently ordered that the relevant proposals should be remitted back to the Secretary of State to be reconsidered. The South East RSS, published in May 2009, is the subject of six High Court challenges, five of them citing grounds similar to those in the East of England challenges. As a result of these challenges the Government Office South West has delayed the RSS process for further assessments to be carried out. The same principles apply, of course, to the current site selection process and the restrictive approach of dismissing the alternative of a larger number of smaller local sites (often <2 Ha). Apart from incinerators, which need economies of scale and are almost inevitably large facilities all the other options can be small scale (AEA Technology for DEFRA 2007) and local with benefits in long term sustainability in the face of increasing environmental costs associated with transport.

17. Officer Response.

The main Site Options consultation paper was 74 pages long. A shorter 8-page summary leaflet was also made available. It is assumed by voluminous consultation documents that the respondent is referring to the supporting evidence base made available in support of the main consultation papers. Notably, most of this e.g. Sustainability Appraisal (SA), Habitats Regulations Assessment (HRA) and Equality Impact Assessment (EIA) is legally required and is by its very nature, technical and often lengthy. For ease of reference a Non-Technical Summary of the SA was made available. With regard to the Council's recycling target of at least 60% by 2020 this is 10% higher than the national target of 50% over the same period, so can reasonably be described as ambitious. We have increased recycling rates from 14% in 2002 to 43% in 2010. To facilitate this step change the Council is working with its partners to deliver the Joint Waste Strategy. This is clearly demonstrated by partners changing their collection systems to facilitate more recycling by collecting new materials such as; food, card and plastics. So far Cotswold District and Gloucester City Councils have changed their collection systems and Tewkesbury Borough Council will be changing later in 2010. Experience has shown that this step change can deliver surprising results with Cotswold recycling and composting rate jumping from around 40% to 60% between 2008 and 2009. The Council is actively working with the remaining District Councils to facilitate these sorts of changes and are confident that it will achieve its overall target of recycling and composting a minimum of 60% by 2020. The Council's Technical Evidence Paper WCS-A on Waste Data has been updated in support of the Publication WCS. GCC continually reviews their waste forecasts for the future, for example, when GCC submitted its Expression of Interest to DEFRA in 2007, it predicted the county would produce approximately 175,000 tpa of residual waste (again, assuming we achieved our 2020 recycling target). When GCC submitted its Outline Business Case to DEFRA in April 2008 the predicted tonnage of residual waste at 2040 reduced to 150,000tpa (again, still assuming we reach our 60% target). It is important to note that household waste is only 25% of the total waste produced by Gloucestershire. The comments concerning Surrey County Council's proposals are noted. The comments concerning capacity are noted. The Publication WCS will clearly set out the position in respect of the existing capacity of waste management facilities in Gloucestershire and the extent of the capacity gap that exists. The comments concerning the application of Sustainability Appraisal are noted. Notwithstanding the potential abolition of the RSS, at the present time it remains a material consideration. In terms of the application of SA to the WCS site options, it is considered that all reasonable alternatives have been tested including a dispersed approach based on a number of relatively small facilities compared to one or two larger facilities.

19. Do you have any comments on the Sustainability Appraisal reports?

The reliability of the Data upon which the Assessments are made: The composite documents include 636 instances where information needed to assess a site is described as uncertain due to lack of spatial information. This raises serious concerns about the usefulness of the rating and marking systems for sites. It is particularly worrying that the information in relation to combined heat and power (CHP) is so sparse. CHP is probably the most significant way in which the very poor

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efficiency of incinerators (generally c.19%-26%) can be improved and the adverse climate impacts reduced. This is clearly an important planning consideration (Communities and Local Government 2007). Yet in practically every case of the assessment of sites for CHP (apart from those which are obviously distant from any other buildings or potential heatload and so can be dismissed without further consideration) the potential is described as uncertain due to lack of spatial information. The Waste Incineration Directive (European Commission 2000) requires: Article 4 (2)(b) : (b) the heat generated during the incineration and co-incineration process is recovered as far as practicable e.g. through combined heat and power, the generating of process steam or district heating; Article 6 (6): 6. Any heat generated by the incineration or the co-incineration process shall be recovered as far as practicable. These requirements can only be secured at the planning stage and should be properly and fully addressed in the site selection process. We note also that Defra's Outline Business Case template for PFIs (Department for Environment Food and Rural Affairs (DEFRA) 2008) says: Combined Heat and Power (CHP) solutions are typically the most efficient outcomes giving a significant climate change benefit. The OBC will therefore be strengthened significantly if developed in a manner that encourages the delivery of solution other studies finding similar results include, but are certainly not limited to: Without CHP any application must be very much weaker than would otherwise be the case and the uncertainty that this introduces to the site selection process makes proposals vulnerable to legal challenges such as that which succeeded in quashing the planning permission of the incinerator proposed at Capel (England and Wales High Court (Administrative Court) 2009). Apparent Errors in the assessment of sites with restoration conditions PPS10, as para 21, gives priority to the re-use of previously-developed land. Brownfield, or previously developed land is defined on page 26, Annex B of PPS3 (November 2006) as (with my emphasis): Previously-developed land (often referred to as brownfield land) 'Previously-developed land is that which is or was occupied by a permanent structure, including the curtilage of the developed land and any associated fixed surface infrastructure.' The definition includes defence buildings, but excludes: - Land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures. This exclusion is referred to in the appendix to the Sustainability Appraisal and the approach adopted is that: Therefore, where former minerals and waste sites have been restored, these are not considered as previously developed land in the sustainability appraisal. 2.21 There are several existing landfill (and other) sites included in the selection which are subject to restoration condition included with their planning permission. These sites, especially where they have time limited consents, as in most cases, should be considered as Greenfield site for the purposes of future development proposals even before they have been restored. This approach would be consistent with the decision of the Secretary of State in relation to an appeal relating to the Sandyforth opencast coal site (Secretary of State for Communities and Local Government 2006). In that case the SoS said: The definition of previously developed land in Annex C to PPG 3 Housing states: The definition includes defence buildings and land used for mineral extraction and waste disposal where provision for restoration has not been made through development control procedures.And concluded: Inquiry Document 52 (Report to Planning and Development Committee of 30 April 1996) includes a list of recommended conditions, including those to cover the restoration of the site. As such, the Secretary of State concludes that the appeal site does not constitute previously developed land, and should be considered a greenfield site, in line with the extracts from PPG3 above. (my emphasis) I note that the SoS has been careful to say the site should be considered and that this is not conditional on the restoration having taken place. The approach proposed by Land Use Consultants is therefore incorrect - it would, in any case, undermine the reasons for putting time limits on such planning permissions if those sites were automatically favoured for developments extending beyond their planned life. The flawed interpretation certainly impacts upon the Wingmoor Farm East site which is currently operating without a valid planning permission. The permission having expired in May 2009. This and similar sites should therefore be weighted as Greenfield sites in the selection process.

19. Officer Response.

It is not clear what is meant by the composite documents, but presumably the reference to 636 instances of the term uncertain due to lack of spatial information is primarily referring to the Stage 1 Sustainability Appraisal (SA) Appendix 2. The Waste Planning Authority has a number of comments to make in response. 1. The totting up of 636 instances of the use of a particular phrase is simplistic and in no way a meaningful exercise. SA documents (and indeed site selection Evidence Papers) are, by their nature, very iterative and use significant numbers of tables and matrices and thus simply calculating the volume of a phrase, use of a word or symbol creates a misleading picture. 2. Stage 1 SA Appendix 2 is a 621 page document assessing over 110 diverse sites including extremely large cluster sites against a

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very broad range of indicators. A large number of uncertainties are to be expected. But it is extremely comprehensive in the detail that it does provide -hence the length of the document. Some of the spatial information is impossible to predict e.g. the exact location of future housing in a particular area or data sets may simply not exist at this point in time. 3. SA Stage 1 should not be the focus rather it is a precursor to the SA Stage 2 report. The respondent has not focused on the Stage 2 SA which focuses on the 13 sites that are actually suitable in planning terms as well as deliverable - with willing landowners. 4. Government guidance on SA - Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents (ODPM November 2005) allows for a degree of uncertainty in the SA process, given that it is an appraisal with a significant qualitative element and not a scientific document. 5. Contrary to the respondents' claims, the issue of CHP is adequately addressed in WCS Site Options documents including the SA bearing in mind (a) The limited information about the specific technology being proposed through the Residual Project given the Council's technology neutral position and (b) linked to above -the difficulty of approaching potential neighbouring heat clients given the technology neutral position and the uncertainties over what sites would eventually be proposed in the publication WCS. 6. SA Objective 22 was specifically included to address the CHP issue and other Climate Change related issues: The headline objective is 'To reduce contributions to and to adapt to climate change. The specific sub question relating to CHP is: To what extent does the site or facility offer the capacity for net energy generation, community heating / combined heat and power or the production of waste derived biofuels / biogas? In Appendix 1 of the WCS Stage 2 SA Report September 2009, the framework and assumptions for SA Objective 22 clearly explain how options and sites will be scored. There is an overarching explanation that if energy were to be recovered from the waste management process under a CHP scheme, this could have a significant positive effect on increasing the proportion of energy generated from renewable sources in Gloucestershire. However, in general, the opportunity to incorporate a CHP scheme is only available to future residential or business park developments as opposed to retrofitting infrastructure into existing development. Proximity to future residential/business developments is difficult to determine. In addition, the type of facility to be developed on each site will not be known until the planning application stage thus the significant positive effects would be uncertain. The flexibility of the site to adapt to climate change will depend more on the specific design of the facility and its layout, and incorporation of sustainable construction techniques, drainage systems and measures to enable changes to new technologies as they develop etc. This can not be assessed until the detailed proposals for a site are known, which would be at the planning application stage. The assumption for a very positive SA score (++?) states that: Sites that are within or adjacent to an industrial estate or known/proposed user of CHP have the potential for significant positive effects if energy were to be generated from the waste management process and used within nearby development. This score is uncertain however, as it will depend on the type of facility proposed on the site, and the feasibility of incorporating energy use within nearby development, which will not be able to be determined until planning application stage. The assumption for a positive SA score (+?) states that: Sites that are within 250m of an industrial estate or known/proposed user of CHP could have a minor positive effect with regards this objective if energy were to be generated from the waste management process and used by neighbouring users. However, the potential for this will depend on the nature of the facility that would be developed on the site. The assumption for a neutral SA score (0) states that: Sites that are greater than 250m from an industrial estate or known/proposed user of CHP would have no effect on this objective. Against SA Objective 22 each of the 13 sites has a comment on CHP potential alongside the scores. The comments are based on the broad assumption that sites in or close to industrial estates theoretically have CHP potential, but they also reflect the fact that in reality the process of retrofitting CHP schemes into existing development is can be difficult. The assumption is that a blank canvas in land development terms offers the best prospects for CHP utilisation. 7. The WCS Site Options document considered the option of locating future waste facilities in growth areas or urban extensions (See the consultation document Para 3.35 and Technical Evidence Paper WCS-P Urban Growth Areas & waste Management. This option was considered specifically for the potential CHP benefits that could be realised. However, there was no interest from either the waste industry or the housing / business sector. On the matter of the definition of previously developed land and the areas in the WCS Site Options document at Wingmoor Farm East and Wingmoor Farm West: There are differing interpretations in relation to this matter. The land, both for mineral development and landfill activities required planning permission as is classified as development. The Secretary of State's Proposed Changes to Policy W2 of the South West RSS (a material consideration) was clear that the identification of sites for the provision of new waste facilities should take account of 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. Considering sites in the Wingmoor farm area also accords with the co-location recommendations in paragraph 20 of PPS10.

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With respect to the planning status of Wingmoor Farm East, at this point in time the planning application for life extension is being considered by GCC's planning department. When a decision is made, the WCS process will be informed by that decision. Finally, we note that in their response to the WCS Site Options consultation, Government Office for the South West (GOSW) had no concern with the SA reports.

Number 219 Type ENV Name Malcolm Watt Organisation Cotswold Aonb Partnership

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

The recognition of the constraint of the Cotswolds Area of Outstanding Nastrual Beauty.

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

Supported subject to recognitionof constraints for such sites.

8. Officer Response.

Comment noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester		X	
2. Hurst Farm, Lydney			X

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3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

The Foss Cross site is in the Cotswolds AONB in an isolated location. It is currently used as a household recycyling centre. The Cotswolds Conservation Board would object to any expansion in scale of activity at this site. A more suitable location should be found in CIrencester.

10. Officer Response.

Comment noted. National policy does not prevent development within the AONB. It does, however, demand that the need for such development can be demonstrated and that the development is carried out to high environmental standards. Foss Cross would not be considered suitable for a large-scale facility and would only be suitable for a small-scale facility to support a strategic network of sites. It is highly unlikely that waste would be imported to Foss Cross from outside of the AONB because the purpose of including smaller dispersed sites would be allow waste to be treated closer to its arisings and improve sustainability. All sites within the county which met the initial 'inclusion criteria' outlined in Technical Evidence Paper WCS-N were considered. There was over 300 sites identified in total (including sites within Cirencester), the reason that more sites have not been identified in the consultation document is that no further sites were found to be suitable. Please refer to Section 2 and Appendix A of Technical Evidence Paper WCS-N. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. This site will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

Supported subject to recognition of constraints.

12. Officer Response.

Support in principle noted.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

Possibly a ste could be found for a household waste recycvling ssite in the area allocated for development at Kingshill in Cirencester, or in the Love Lane Industrial Estate.

13. Officer Response.

Both of these sites were investigated as part of the technical study, but found to be undeliverable. Please see Technical Evidence Paper WCS-N and its Appendices C.4 (Kingshill North) and C.68 (Love Lane, Cirencester).

14. Do you have any comments on the Executive Summary?

Recognition of constraint of AONB welcomed.

14. Officer Response.

Noted.

16. Do you have any comments on Section 2?

No

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16. Officer Response.

noted

17. Do you have any comments on Section 3?

Recognition of contraint of AONB welcomed.

17. Officer Response.

Support noted.

18. Do you have any comments on Section 4?

No

18. Officer Response.

Noted

19. Do you have any comments on the Sustainability Appraisal reports?

Where are these?

19. Officer Response.

The SA Reports were available with all the other consultation documents on the Council's website, at all District Council Offices and local libraries and on request. An executive summary report was produced alongside the main report for ease of reference.

20. Do you have any comments on the Habitat Regulations report?

Where is this?

20. Officer Response.

The HRA Screening Report was available with all the other consultation documents on the Council's website, at all District Council Offices and local libraries and on request.

Number 208 Type PC Name S Weaver Organisation Moreton Valence Parish

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Whilst we support the consultatio, we do not support any further waste managment in Moreton Valence - we have enough here already.

2. Officer Response.

Support noted. The re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community. Notably, the Moreton Valence site received a good level of support in response to the site options consultation. Having regard to all of the issues raised and taking particular account of likely deliverability and the need to manage waste close to source, it has been decided to take this site forward as a strategic site allocation within the Publication WCS. The Council is not however convinced of the need to extend the site as suggested by the landowner in response to the site options consultation in 2009. The area allocated in the Publication WCS is therefore the original site identified in the site options consultation in October 2009 and not the proposed site extension put forward in response to that consultation. This will allow for future operations to be more readily controlled than would be the case with a more extensive site. Should a detailed proposal come forward, the impact (in terms of residential amenity, traffic, noise, visual impact etc.) will be considered through the planning application process with suitable mitigation measures stipulated as required.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X		
4. Javelin Park, Haresfield	X		
6. Land at Moreton Valence		X	
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works		X	
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

Other rural areas should be used rather than dumping everything in Stroud. City centre is a definite no no - you already have Hempstead!
****Additional comments following additional consultation on Moreton Valence site**** Moreton Valence Parish Council would like the following comments to be recorded with regard to the proposed extension to Smith's site. Suitable Uses and Capacity:-"The additional land is farmland located to the east and south east of the original site"
The use of the site for even more waste management would be of further detriment to Moreton Valence and the residents. This Parish already has its fair share of recycling facilities and feels that Gloucestershire County Council should look into making use of another site within the County to share some of the burden. Using this site would create a precedent for further development of adjoining agricultural land, detrimental to the rural character of the area. If further extensions to Smith's are allowed to continue, at their current rate, Moreton Valence will soon become known as the rubbish tip of Gloucestershire.
Environmental & Other Constraints:Highways: "probably a net increase in traffic, but could be closer to neutral" The site fronts an open de-restricted section of the

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A38 Capital County principal route where traffic speeds are high. The increased traffic movements and manoeuvres that would be generated at this site by the proposal would be likely to interfere with the safe and expeditious movement of major road traffic and create further hazards. The proposal would be likely to result in an increase in the number of motorised journeys to the application site, contrary to the sustainable aims of Central and Local government policies. As the current bus service is not frequent or reliable for those people who do not live in Gloucester City or Dursley, any potential employee outside of these perimeters would need to use their own vehicle to travel to work, thereby increasing traffic. Any pedestrians leaving the site to access the northbound bus stop would need to cross the A38. A pedestrian was killed in November 2006 at the entrance junction to the site, and the fact that there is no street lighting; along with traffic speed of 60mph along the road would have been a contributory factor to this fatality. Gloucestershire Highways advised this Parish in November 2009, that whilst they are carrying out a review of speed limits throughout the County, and the A38 is part of this review, there is no guarantee that the speed limit will be reduced. In the meantime, traffic will continue to use the A38 as a speedway track, thereby increasing the risk of further accidents and fatalities, and an increase in traffic at this dangerous junction will only add to the risk. "the site is in close proximity to the SRN (M5 junction 12) via A38/Cross Keys roundabout". It is fairly obvious that traffic accessing the site from the west via the M5 will use junction 13 to leave the motorway and travel along the A38 via the village of Whitminster. It is madness to suggest that only junction 12 will be used. "The site is not in close proximity to significant numbers of residences" The Bristol Road/A38 is lined with residences - ALL of which will be affected by the increase in HGVs accessing the site. Residential properties along this road are already inundated with traffic pollution and noise, rubbish in gardens, and the further risk of structural damage to their properties caused by the non-stop HGVs that use the route - this will only worsen. Sensitive Receptors: "There are a small number of residential properties within 250m of the site boundary" There are actually other residents within the village whose quality of life would also be affected by the obvious and unvoiced dangers to our health and well-being from the increased amounts of waste being shipped into the Parish. It is the opinion of this Parish that there would be a huge increase in extra traffic, noise and light pollution to the further detriment of all residents in the Parish. Summary Taking all of the above points into consideration, the Parish Meeting would not wish for the proposed extension to Site 6 Moreton Valence Airfield to be approved. Gloucestershire County Council should firstly address the issue of the speed limit along the road and the dangerous site entrance before making any decisions with regard to the proposed extension.

4. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. In relation to the comment about Hempsted landfill. This is an edge of town landfill site that is due to close in approximately 3 -5 years time. With specific relation to Site 7, Notwithstanding the above, the site has not been taken forward into the Publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway

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line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the Publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.
****Response to additional comments following additional consultation on Moreton Valence site**** Please refer to response to Q2 in relation to re-use/intensification of existing sites
A full Transport Assessment will need to accompany any proposal for development. The TA should include a full assessment of the site access and routes to connect to the M5 at Junctions 12 and 13, and beyond to the wider principal road network. Contributions towards both maintenance and junction improvements along the transport routes to and from the site may be required. In particular improvements are likely to junction 12 to the M5 and on the more immediate principal road network such as the A38 and its junction with the B4008. The access junction from the A 38 to the site itself will likely require improvements due to its proximity to an existing junction on the western side of the A38 and an existing lay-by. It should be noted that the Highways Agency has programmed an improvement scheme for Junction 12 in 2010/11, but this does not preclude the requirement for the assessment of the impact of any development traffic upon the operation of the Junction. The 250m buffer used for the sites is the same as that included within the Statement of Community Involvement for major planning applications. Waste development can still take place within 250m of sensitive receptors as potential impacts can be dealt with by the use of appropriate conditions.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Disagree

6. Please give a reason for your answer to Question 5.

Self explantory

6. Officer Response.

Comment noted. It is the Government's intention to formally abolish the South West RSS. Importantly however, the evidence that informed the preparation of the RSS may still be considered a material consideration. Furthermore, despite the potential abolition of the RSS, local authorities are expected to continue to progress their own development plan documents including waste plans, with enough land being provided for waste management facilities to support the sustainable management of waste.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

Number 208 Type PC Name S Weaver Organisation Moreton Valence Parish

10. Please give a reason for your answers to Question 9.

Not familiar with the areas so we couldn't comment.

10. Officer Response.

noted

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

Better than dumping all in one area

12. Officer Response.

Comment noted.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No

13. Officer Response.

Noted

17. Do you have any comments on Section 3?

We ask that Moreton Valence is not used as Smiths's already seem to have a monopoly on waste within our village and we are literally a "dumping" ground for everyone else. There has to be a point when enough is enough and other areas are looked at. Smith's takes everything it can from this village and gves absolutely NOTHING back. The A38 is already a disgrace through the village from rubbish, etc flying off the back of it's lorries and the impact of more traffic speeding past our houses just doesn't bear thinking about. What happened to quality of life and our rights as a community?

17. Officer Response.

Comments noted. Please see response to Q2.

Number 171 Type IND Name Nick and Gina Webster Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
3. Easter Park, Ashchurch		X	

4. Please give a reason for your answers to Question 3.

We are writing to object to the site at Easter Park, Ashchurch being used as a waste site. With the exception of the Gloucester railway triangle site, this site is the closest to the largest amount of housing of any of the sites which are not currently used for waste disposal. It seems reasonable to assume that the site will generate unpleasant smells and dust, possibly harmful, which will inconvenience or endanger the inhabitants of Northway and Ashchurch. The site is fairly close to Northway infants and Ashchurch schools, and could adversely affect children playing outside at breaktimes. Since there are significant areas of housing to the East, North and West of the site, most wind directions will cause problems of smell and dust. We would strongly urge you to consider an alternative site for this development.

4. Officer Response.

Comments noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. Odour, noise and dust are matters that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any sensitive receptors. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning conditions. In terms of harmful emissions, it is important to note PPS10, which states that 'modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health'. Whilst there is housing to the north of the site, it is buffered to a large extent by existing employment uses. Notwithstanding the above, the site has not been taken forward into the publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 119 Type IND Name Michelle West-Wiggins Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

All the sites seem to add new problems. Logistics/close to housing/schools/hospital.

2. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch		X	
4. Javelin Park, Haresfield		X	
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

Most of the waste solutions would impact residents/logistics. Only 1 solution does not create 'fly ash' or require a chimney which would produce emissions - who would want that next to their home? It will impact house value and impact environment. I would not want my 2 year old son living next door to a waste disposal site. What about smell? Transport increasing delivery/collecting this will cause congestion on the already challenged areas. i.e Railway Triangle and Ashchurch.

4. Officer Response.

Comments noted. See previous response in relation to potential impact on urban areas. With regard to the specific nature of the process, at present the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the

Number 119 Type IND Name Michelle West-Wiggins Organisation not applicable/not provided

control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10 , which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. In respect of house prices, it is important to note that the effect of development, waste related or otherwise, on house prices, is outside the scope of the planning system. Odour is a detailed matter that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any 'sensitive receptors'. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning conditions. Modern waste management facilities tend to involve the delivery of waste into an enclosed environment thereby reducing the escape of odours. In relation to Site 7, Land North of Railway Triangle, since the site options consultation was undertaken in October 2009, the Waste Planning Authority has carefully considered all the issues related to this site. The site has not been taken forward into the publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Disagree

6. Please give a reason for your answer to Question 5.

As above, who would want to live next door to a waste site? Impact on house prices, air quality, environment, smell, outlook (aesthetics)

6. Officer Response.

Comment noted. See previous response in relation to potential impact on urban areas. With specific regard to the RSS urban extensions, it is significant to note that the site options consultation revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

Number 119 Type IND Name Michelle West-Wiggins Organisation not applicable/not provided

I'm not sure/I don't know

8. Please give a reason for your answer to Question 7.

I'm not sure as the areas may be less impacting on residential areas and logistics. However to travel with waste to Lydney would surely undo any good work with recycling with additional fuel used. Also the impact on environment and beauty may be more impacted. More work is required to understand the impact.

8. Officer Response.

Comment noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

as section 8

10. Officer Response.

See previous response.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I'm not sure/I don't know

12. Please give a reason for your answer to Question 11.

as response 8

12. Officer Response.

See previous response.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

Why not use the existing landfill site area? The local residents already have this in place so will not re offend any new areas. Logistics have improved to Hempsted so links up areas out of Gloucester as well as the City. The area would not be suitable to build residential homes on for years due to emissions from existing waste. It's a good use of existing or what would be 'waste ground'. Again 'reusing, recycling, reducing' theory. Reusing land, recycling existing use, reducing impact on new areas and environments.

13. Officer Response.

It has been assumed that this comment refers to Hempsted landfill and not the Wingmoor sites which were included in the consultation document. Technical Assessments were carried out on Hempsted landfill and HRC sites and the landowner also expressed an interest in promoting the site for residual MSW treatment. However, the flood risk associated with the site was so severe that it was decided not to include Hempsted within the consultation document. This decision was

Number 119 Type IND Name Michelle West-Wiggins Organisation not applicable/not provided

supported by the Environment Agency. Please refer to Appendix C.13 of Technical Evidence Paper WCS-N and pages 21-23 of Technical Evidence Paper WCS-O.

17. Do you have any comments on Section 3?

My comments cover all areas. Documents clear, concise and thorough. However, not well publicised. The forums were excellent but I know the attendance was low - anyone surprised? The advertisements on locations and times were nonexistent and hard to find. Searching through your website took 15 minutes to find the times. This was a shame considering the effort of the staff on attendance who were excellent. At the Guildhall a sign outside the door would have been useful, a link on the Guildhall site as well as a brief list in the Citizen over the month.

17. Officer Response.

Support for consultation documents and roadshow welcomed. The roadshows were advertised as well as possible. There was a sign placed outside the Guildhall to advise people of this Saturday event.

Number 351 Type IND Name Kieran Whelan Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

I am a member of Cheltenham Clay Club which has been at Wingmoor for approx. 40 years and I object to any activities or development there which would adversely affect the shooting facilities there.

2. Officer Response.

Comment noted. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the inclusion criteria for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that this site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

I have not had time to study the paper in full but note that some sites are more locally centered and would therefore generate less miles travelled overall. I also

Number 351 Type IND Name Kieran Whelan Organisation not applicable/not provided

quickly noted that some sites seem to be less occupied in terms of other activities whereas Wingmoor has two active thriving gun clubs there.

4. Officer Response.

Comments noted. Please see previous response on Area C of the Wingmoor West site.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

6. Please give a reason for your answer to Question 5.

Not sure.

6. Officer Response.

Comment noted.

7. Do you support the identification of sites outside Zone C?

I'm not sure/I don't know

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

11. Do you support the approach of using a combination of sites within and outside Zone C?

I'm not sure/I don't know

17. Do you have any comments on Section 3?

Only that I objecvt to any activities at Wingmoor which would adversely affect shooting there. Shooting facilities are generally in decline and we can't afford to lose more.

17. Officer Response.

Comments noted. Please see previous response on Area C of the Wingmoor West site.

Number 355 Type IND Name Gerald Whelan Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

But, I would want sites outside 'Zone C' used as well

2. Officer Response.

Support for Zone C noted. It is essential that the WCS provides a clear strategy setting out what will be built and where. This will provide certainty and confidence to the development industry and help bring proposals forward. The Council's preferred strategy is to focus the location of new strategic waste management facilities on the area defined as Zone C. This approach is considered to be consistent with national policy (PPS10) and the Regional Waste Strategy. Although the preferred focus for strategic waste management is Zone C, a number of other sites were identified outside this zone in the Forest of Dean and Cotswold District in order to provide suitable flexibility and support for the Zone C sites. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X		
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park	X		
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West			

4. Please give a reason for your answers to Question 3.

I support broad based, diversified waste sites, all in use, except the triangle site which is too central, too visible to the city and will present logistical problems with lorries etc, in and out.

4. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. In relation to Site 7, Land North of Railway Triangle, the site has not been taken forward into the publication WCS because the

Number 355 Type IND Name Gerald Whelan Organisation not applicable/not provided

site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land. The site has a frontage along the railway line, and could theoretically have access to the rail network. However, no indication of support for the construction of new sidings onto the railway line to serve a waste facility at this location has been given by Network Rail. Capacity problems already exist on the main railway line between Gloucester and Worcester meaning that few paths for freight trains would be available even if rail access were available. Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Disagree

6. Please give a reason for your answer to Question 5.

I am 100% in support of the County Council in opposing further urbanisation, especially around Gloucester. The developments that have already taken place have increased pressure on all the services necessary to support such development. There should now be a period of "bedding in" and reflection on success/experience gained.

6. Officer Response.

Comment noted. The potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

I certainly think that a wide range of sites should be considered especially the logistics problems/transport lorries, less costs, & environmental issues, CO2 use in transporting longer distances etc.

8. Officer Response.

Support for sites outside Zone C noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other

Number 355 Type IND Name Gerald Whelan Organisation not applicable/not provided

material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney	X		
3. Land at Lydney Industrial Estate, Lydney	X		

10. Please give a reason for your answers to Question 9.

I am familiar with these sites and certainly they should be used - again because of diversification. Lydney is to my mind an underused asset now.

10. Officer Response.

Support noted.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

see previous answers

12. Officer Response.

See previous responses.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No

13. Officer Response.

Noted

14. Do you have any comments on the Executive Summary?

No

14. Officer Response.

noted

15. Do you have any comments on Section 1?

No

15. Officer Response.

noted

16. Do you have any comments on Section 2?

In general, I would like to see far greater emphasis on reducing packaging, wastage on food, etc. But this is for Government, not our Local Authority.

16. Officer Response.

Comment noted. There have been a number of initiatives in this direction such as the Packaging & Packaging Waste Directive (94/62/EC) and the subsequent Packaging (Essential Requirements) Regulations 2003 (S.I. 2003 No 1941), and the County Council welcomes these. 'Producer responsibility' is becoming a key focus in

Number 355 Type IND Name Gerald Whelan Organisation not applicable/not provided

many new legislative changes. However the County Council does not make legislation so is limited in what it can do to bring about change. We do actively participate in a number of groups which lobby for changes in waste legislation such as the Local Government Association, the National Association of Waste Disposal Officers and the County Surveyors Society. We are also in regular contact with local retailers to ensure that we work as close together as possible to promote reduction and recycling messages. In addition to responding to legislative pressure, retailers and major brand owners have for the past 5 years been addressing packaging under the 'Courtauld Commitment'. This national voluntary agreement aims to cut down on the use of packaging materials, reduce their impacts and incorporate more recycled materials into packaging. We are aware of the benefits that the Courtauld Commitment is delivering and of its' importance in reducing the waste impacts of a large number of common household consumable items. Information on progress made to date is easily accessible via case studies and reports on the website of the Waste & Resources Action Programme (WRAP). In March 2010 a second phase of the Courtauld Commitment was launched. This aims to extend the programme deeper into the supply chain in order to multiply the benefits further.

18. Do you have any comments on Section 4?

I think something positive needs to be done to ensure that everyone uses the various bins & boxes we now have at our disposal. I am retired and when out walking on 'bin day' find it amazing some people don't have green recycling boxes with their bins. On the other hand I don't much like the idea of 'chip' technology on the bin! I don't know what the answer is.

18. Officer Response.

Comment noted. Whilst increasing recycling is an important objective, the site options consultation focuses on sites that may be suitable for the treatment of 'residual' municipal waste i.e. the waste that is leftover after recycling and composting. The Publication WCS will include policies relating to both recycling and residual treatment.

19. Do you have any comments on the Sustainability Appraisal reports?

No

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

No

20. Officer Response.

Noted.

Number 17 Type IND Name Barrie White Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
8. Nastend Farm, Stroudwater Business Park		X	

17. Do you have any comments on Section 3?

Further to your letters of September and October 2009 regarding 13 potential waste sites in the county. I strongly object to any Greenfield site being used for this toxic and dangerous treatment of waste. Having recently spoken to our M.P. Mr David Drew and our Gloucestershire County Councillor Tony Edwards regarding the proposed site near our home at Nastend, we all agreed that positioning any sort of waste facility near Stonehouse was ludicrous. Myself and other residents of this area wish to identify the Councillors and Officers of Gloucestershire County Council who proposed this ill thought out scheme and at what cost to the rate payers!

17. Officer Response.

Comments noted. Whilst Site 8, Nastend Farm is currently Greenfield it is allocated for employment use in the Stroud District Local Plan. The principle of built development in this location has therefore already been accepted. The Waste Planning Authority has carefully considered all the issues on this site. Notwithstanding the above the site has not been taken forward into the publication WCS because although the County Council is the landowner, following discussions with the County Council's Waste Disposal Authority (WDA) it would appear that there is significant uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore, the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations. In terms of the comments concerning toxic and dangerous waste the proposal is for a facility to treat residual municipal waste (mainly household). This is the leftover black-bin waste that cannot be recycled or composted. It is not toxic or dangerous. In any case, PPS10, states that modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health. GCC view health impacts and safety as important.

Number 101 Type DCLLR Name Martin Whiteside Organisation Stroud District Councillor

17. Do you have any comments on Section 3?

I support decentralised MBT and anaerobic digestion - which might be appropriate of some of these sites. However I write to object to the use of all 13 of the sites listed for possible waste treatment in Gloucestershire on the grounds that you havn't said what or how they may be used: a.. Any of these sites could be used for incineration, which I oppose. b.. Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. c.. I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. d.. The long term costs to the taxpayer will be higher with incineration. e.. Incinerators act as a disincentive to reduce, reuse and recycle. f.. The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas g.. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. h.. Large incinerators in other areas of the country are already deemed to be a mistake

17. Officer Response.

With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract ould increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 209 Type NPC Name - Wilce Organisation Parish Clerk Cricklade Town

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

7. Do you support the identification of sites outside Zone C?

I'm not sure/I don't know

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
3. Land at Lydney Industrial Estate, Lydney			X

Number 4 Type IND Name C M Wilcox Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch		X	
4. Javelin Park, Haresfield		X	
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence		X	
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works		X	
10. The Park, Wingmoor Farm West	X	X	

17. Do you have any comments on Section 3?

I write to object to the use of all 13 of the sites listed for possible waste treatment in Gloucestershire and specifically the Javelin Park Site in Haresfield, on the grounds that: Any of these sites could be used for incineration, which I oppose. Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. The long term costs to the taxpayer will be higher with incineration. Incinerators act as a disincentive to reduce, reuse and recycle. The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. Large incinerators in other areas of the country are already deemed to be a mistake.

17. Officer Response.

Comments noted. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic

Number 4 Type IND Name C M Wilcox Organisation not applicable/not provided

allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 152 Type IND Name Jane Wilkinson Organisation not applicable/not provided

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester		X	

10. Please give a reason for your answers to Question 9.

I am a resident of North Cerney and am very concerned about the possibility of a waste disposal incinerator at Foss Cross. The village is already used as a major route to the industrial site and landfill depot, and any further developments would have serious implications for the narrow and steep lanes through the village and to Foss Cross. The site is so close to Calmsden and North Cerney that it could be extremely detrimental to the area which is within the ANOB. Tourism plays a major role in the area and local pubs, hotels, cycle routes, footpaths and long distance walking routes would all be affected. Before any further development takes place, I would suggest that the local newspaper is given full and clear details about the proposal to pass on to the residents, many of whom do not have internet access.

10. Officer Response.

Comments noted. National policy does not prevent development within the AONB. It does, however, demand that the need for such development can be demonstrated and that the development is carried out to high environmental standards. Foss Cross would not be considered suitable for a large-scale facility and would only be suitable for a small-scale facility to support a strategic network of sites. It is highly unlikely that waste would be imported to Foss Cross from outside of the AONB because the purpose of including smaller dispersed sites would be allow waste to be treated closer to its arisings and improve sustainability. At this stage, without detailed modelling, it would not be possible to say for certain how this would affect lorry movements, but there is no indication that lorry movements would be increased, it is more likely that they would be decreased. There would be no discernible impact on tourism or public rights of way. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. This site will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 212 Type PC Name T L Willett Organisation Winchcombe Town Council

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

It is crucial that the type of recycling plant is decided upon before selecting the site. Suitable sites should be identified and consulted upon once the technology is selected.

2. Officer Response.

Comment noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch			
4. Javelin Park, Haresfield		X	
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester	X		
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

Wingmoor Farm is already the landfill site for Tewkesbury Borough and lends itself to expansion for this. Presumably it would also be possible to used reclaimed land if appropriate. It is realised that the recycling plant should be close to the place of origin of the waste. It would not be appropriate to have a large works capable ofhandling waste from other authorities. Access is also a problem Wingmoor Farm already has the infrastrucure in place.

4. Officer Response.

Support for Wingmoor Farm sites noted. The use of existing waste management facilities is consistent with national policy however, regard must be had to the cumulative effect of previous waste disposal facilities on the care and well being of the local community including any significant adverse impacts on environmental quality, social cohesion and inclusion or economic potential. (PPS10).

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Agree

Number 212 Type PC Name T L Willett Organisation Winchcombe Town Council

6. Please give a reason for your answer to Question 5.

The strategy should be to look to the future and build with capacity in mind not piecemeal expansion or adding bits on.

6. Officer Response.

Support noted. However, the site options consultation has revealed little interest from either the waste industry or the developers of the urban extensions in developing a strategic waste management facility or facilities as part of those proposals. Furthermore, the Government's intention to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I do not support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester	X		
2. Hurst Farm, Lydney	X		
3. Land at Lydney Industrial Estate, Lydney	X		

11. Do you support the approach of using a combination of sites within and outside Zone C?

I do not support the approach of using a combination of sites from within and outside Zone C

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No

13. Officer Response.

Noted

16. Do you have any comments on Section 2?

It is crucial that the type of recycling plant is decided upon before selecting the site. Suitable sites should be identified and consulted upon once the technology is selected.

16. Officer Response.

Comment noted. Please see repsonse to Question 2.

17. Do you have any comments on Section 3?

It is crucial that the type of recycling plant is decided upon before selecting the site. Suitable sites should be identified and consulted upon once the technology is selected.

17. Officer Response.

Comment noted. Please see response to Question 2.

18. Do you have any comments on Section 4?

The strategy should be to look to the future and build with capacity in mind not piecemeal expansion or adding bits on.

18. Officer Response.

Number 212 Type PC Name T L Willett Organisation Winchcombe Town Council

Comment noted. Looking to the future and building in the capacity needed is what Forward Planning (the WCS process) does. The WCS will cover the period 2012 - 2027 (i.e. 15 years from adoption) and set out a proposed strategy for that period which will be monitored annually and revised accordingly.

19. Do you have any comments on the Sustainability Appraisal reports?

The strategy should be to look to the future and build with capacity in mind not piecemeal expansion or adding bits on.

19. Officer Response.

Comments noted. Please see response to question 18.

Number 8 Type IND Name E J Willey Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
8. Nastend Farm, Stroudwater Business Park		X	

4. Please give a reason for your answers to Question 3.

I wish to record an objection to Waste Incineration in Gloucestershire because of the possible damage to health by toxic fly ash residue by ingestion etc. caused by incineration and another option would be Mechanical Biological Treatment which is better for the Environment. Re. the proposed Waste site at Nastend Farm Stonehouse. It would be unsuitable as a Waste site due to the following problems it would cause: 1. An increase of traffic on the A419 caused by Waste carrying Lorries would add to the congestion that is already experienced at certain times of the day due to the present motorway traffic. 2. The proposed Waste site would be in close proximity to Stonehouse Town centre and would have an undesirable impact on local people which includes the workers at the Stroud Business Park. To conclude the use of large incinerators used in other Areas of the country for Waste disposal have deemed to be a mistake.

4. Officer Response.

Comments noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. PPS10, states that modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health. Furthermore, the detailed consideration of a waste process and the implications, if any, for human health is the responsibility of the pollution control authorities. PPS10 also states that, where concerns about health are raised, waste planning authorities should avoid carrying out their own detailed assessments rather they should ensure, through drawing from Government advice and research and consultation with the relevant health authorities and agencies, that they have any advice on implications for health. The WPA duly sought the advice from the PCT/NHS through the site options consultation. With regard ti site 8, Nastend Farm the site has not been taken forward into the publication WCS because although the County Council is the landowner, following discussions with the County Council's Waste Disposal Authority (WDA) it would appear that there is significant uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore, the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 73 Type IND Name E M Willey Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I wish to object to waste incineration in Gloucestershire because of the following: Health hazard, to local residents. One of the proposed sites Nastend Farm close to my residence would be affected by ashes & fumes. Traffic on the A419 would be increased by Lorries etc. In conclusion there are other alternatives to incineration and they should be adopted.

17. Officer Response.

Comments noted. Dealing with each in turn. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. With regard to Site 8, Nastend farm, the site has not been taken forward into the Publication WCS because although the County Council is the landowner, following discussions with the County Council's Waste Disposal Authority (WDA) it would appear that there is significant uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore, the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the Publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 40 Type IND Name M Williams Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
4. Javelin Park, Haresfield		X	

4. Please give a reason for your answers to Question 3.

I write to object to the use of Javelin Park Haresfield for possible waste treatment in Gloucestershire on the grounds that: It could be used for incineration, which I oppose. I oppose any of the 13 sites to be used particularly for incineration. Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. The long term costs to the taxpayer will be higher with incineration. Incinerators act as a disincentive to reduce, reuse and recycle. The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. Large incinerators in other areas of the country are already deemed to be a mistake.

4. Officer Response.

Comments noted. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 58 Type IND Name Brett Williams Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

I write to object to any proposal to use land at Wing moor Farm, Stoke Orchard for the provision of additional waste disposal facilities. The reasons for my objection to the proposal are as follows: The nearby villages are already affected by the noise and damage created by heavy lorries, this will be significantly worsened by a further development of this type which can be avoided by locating it elsewhere. Road safety will be further compromised in the area by additional heavy transport travelling along local roads, particularly with regard to local junior schools and the young children and parents that use them. Part of the site is used by Cheltenham Clay Club and,' offers excellent facilities to members and visitors, there is no equivalent facility in the area. The club has been in existence for many years, and has an excellent record. The site has been landscaped by the club involving the planting of many hundreds of trees which now attract a varied range of interesting birdlife. The site is not central to the county and will require the transport of material on journeys of many miles, hardly an environmentally friendly practice. I feel there must be several" more appropriate sites for you to use with better motorway access and would urge you to consider those first.

4. Officer Response.

Comments noted. Dealing with each point in turn. PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. This should include matters such as lorry routeing and road safety issues. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the 'inclusion criteria' for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that this site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 160 Type IND Name Angela Williams Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
4. Javelin Park, Haresfield		X	

17. Do you have any comments on Section 3?

I write to object to the use of all 13 of the sites listed (especially Javelin Park Haresfield) for possible waste treatment in Gloucestershire on the grounds that: 1. any of these sites could be used for incineration, WHICH I STRONGLY OPPOSE. 2. incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. 3. i understand that incineration contracvts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor or any newer more efficient and effective technologies which are being repidly developed. 4. the long term costs to the taxpayer will be higher with incineration. 5. incinerators act as a disincentive to REDUCE, REUSE AND RECYCLE which i actively do on a daily basis. 6. the sites are not evenly distributed around the county of Gloucestershire, giving too little weight to the negative aspects of transporting waste and to the need for us all to take responsibility for the disposals of the waste we create in our own areas. 7. Mechanical Biological treatment (including anaerobic digestion) technology is a proven alternsative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. 8. Large incinerators in other areas of the country are already deemed to be a mistake. 9. other strategies for the reduction of waste should be identified, with the largest area being the product manufacturers, who should be taxed if their products create a lot of waste or the shelf life of the product is too short. such examples Furniture - these days furniture may last say 7-10 years, whereas previous generation would have made such purchases which would last some 15 years plus. Creating a society which is encouraged by the manufacturers to update and replace goods generates even more waste. Such practices should be discouraged or make the manufacturers accept the old goods when purchasing new and making them responsible for disposal including returning to country of origin (a large percentage of imports come from the far east, which consumes vast energy and raw materials, therefore, they should be encouraged to have the products back). 10. insurance companies replace old for new, the works recently undertaken as a result of the 2007 floods must have created mountains of goods which i am sure a large majority could have been repaired or cleaned. 11. the waste strategy should be looking at the heart of the problems not identifying how all this waste can be disposed of. The best alternative is REDUCING THE WASTE PRODUCED and encouraging RECYCLING, ETC. Every village, town and city should be responsible for identifying a number of ways of reducing their own waste, rather than transporting the waste to other areas. Good initiatives as starting points, local composting facilities made available to all, community recycling points to reduce the carbon footprint, for paper, cans bottles, cardboard etc, maybe even food waste. 12. incentives for communities who make a wholesale reduction in waste, extra payments to villages and towns for amenities if waste reduction targets met or incentives for households such as reductions in council tax or bonus payments. 13. incineration really is not the answer, there are far more environmentally friendly ways to dispose of waste and i would like to see a number of smaller sites for waste disposal to reduce the environmental impact of transporting the waste and a waste disposal strategy that can be larger returned to the land in the form of waste turned into compost.

17. Officer Response.

With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter

Number 160 Type IND Name Angela Williams Organisation not applicable/not provided

period either the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill. The issue of packaging/retailer waste is referred to in the Publication WCS but is outside of its scope to a large extent.In line with the Waste Hierarchy, the publication WCS focuses on waste reduction, re-use and recycling and composting. There will however always be a residual element that must be managed.

Number 203 Type IND Name Angela Williams Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

cutting the carbon footprint of movement of waste, however, a number of small sites should be identified to reduce the distance to an even smaller area for the movement of waste.

2. Officer Response.

Support for Zone C noted. Zone C focuses on Gloucester and Cheltenham which is where most of Gloucester's waste arises. This approach will help to minimise the movement of waste by treating it close to source and is consistent with national and regional policy. In terms of movement of waste from further afield, the use of transfer facilities to 'bulk-up' waste from smaller collection vehicles into larger vehicles, will help to reduce the number of separate trip movements that need to be made for the waste to reach the treatment/recovery facility/facilities. It has been determined through the WCS that the Council will define a 'strategic site' as one which is capable of treating at least 50,000 tonnes of waste per year. The 13 sites identified in the consultation paper present the possibility of using a combination of different sites. The council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. At this point in the procurement all bidders make some use of Javelin park, whilst in some cases final processing takes place outside of the county. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			
4. Javelin Park, Haresfield		X	
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence		X	
7. Land north of Railway Triangle, Gloucester	X		
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

most of the sites chosen are near urban development, but not too close to have a massive environmental impact.

4. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to

Number 203 Type IND Name Angela Williams Organisation not applicable/not provided

develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Disagree

6. Please give a reason for your answer to Question 5.

There appears to be no real demarkation between town as it is and the urban sprawl into rural area are eating away at the countryside

6. Officer Response.

Comment noted. The Government's intention to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I'm not sure/I don't know

8. Please give a reason for your answer to Question 7.

I would not support the use of green belt for such activities or AONB or special interest

8. Officer Response.

Comment noted. In terms of development within the Green Belt, PPS10 makes it clear that green belts should be protected but there is also a 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. In relation to development within the AONB, importantly, Foss Cross was the only site in the WCS site options consultation document located within the AONB. This site accommodates an existing Household Recycling Facility (HRC). On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCs, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X

Number 203 Type IND Name Angela Williams Organisation not applicable/not provided

3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

i am not aware of these areas, may only comment wouldbe they are regarded as a long way out from the urban areas which may overcome possible objection on being close to residential areas

10. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which emphasises that planning strategies should 'provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities'. It is also consistent with Policy W2 of the South West RSS Proposed Changes which adopts a 'sequential' approach to the location of strategic waste management facilities, requiring them to be located within strategically significant settlements (such as Gloucester and Cheltenham), or if not practicable on the edge, or it that is not practicable, within close proximity (defined as within 16km). It is also pertinent to note that the companion guide to PPS10 states that, 'with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development'. Whilst the Council's preferred strategy is to provide strategic waste management facilities within Zone C, there is likely to be a role for sites outside this area e.g. smaller scale provision or supporting infrastructure e.g. waste transfer. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. These sites will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the sites forward as allocations at this stage does not mean that the sites are unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I do not support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

the answer is largely dependent on what the mixture of sites would be used for.

12. Officer Response.

Comment noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

what about putting the facilities on existing recycling site e.g. hempstead and horsley as these sites are already dealing with the waste, but currently as land fill.

13. Officer Response.

Pyke Quarry, the HRC site at Horsley (Site ref 160) was initially identified but no technical assessments were carried out after it was removed by the application of the exclusion criteria outlined in Section 4 of Technical Evidence Paper WCS-N. Technical Assessments were carried out on Hempsted landfill and HRC sites and the

Number 203 Type IND Name Angela Williams Organisation not applicable/not provided

landowner also expressed an interest in promoting the site for residual MSW treatment. However, the flood risk associated with the site was so significant that it was decided not to include Hempsted within the consultation document. This decision was supported by the Environment Agency. Please refer to Appendix C.13 of Technical Evidence Paper WCS-N and pages 21-23 of Technical Evidence Paper WCS-O.

14. Do you have any comments on the Executive Summary?

No,

14. Officer Response.

noted

Number 394 Type IND Name Mike Williams Organisation not applicable/not provided

17. Do you have any comments on Section 3?

It has been brought to my attention that Gloucester District Council is undertaking consultation on sites that could potentially be used for the treatment of waste, and that the Waste Treatment at Area C at Wingmoor farm East is one of the sites under consideration. I also understand that if this site is one of those chosen, then it will have a significant impact on Cheltenham and District Clay Club which has its club ground on Area C. In fact the Club could have to be closed and / or re-sited. I have been a member of Cheltenham and District Clay Club for 20 years and have shot their regularly during that period as do both of my sons now. I am shocked that the council are even considering that the club grounds could be impacted by such a plan. There are many other, more viable sites in the council's consultation documents - in fact this site is the only site under consideration that has an activity based on it and where there is no alternative solution proposed. Will the council, as part of their implementation plans, incorporate a Club re-location plan?, one that does not impact the members significantly?, one that does not mean the members have to drive significantly further for example? - a particularly noteworthy point in the current environmentally sensitive world we live in. This club is a well established club and the shooting grounds have been there for many decades during which time the members have invested heavily in developing one of the best shooting grounds in the region. It would be a sad loss if this was all closed for a waste management site. In my opinion the other sites under consideration are more suited - one's that have better access are surely more viable...? The increase in waste traffic through the villages of Bishop's Cleeve and Stoke Orchard would be intolerable for the residents - this alone should be cause to consider elsewhere. I strongly urge the council to remove Wingmoor Area C from its list of potential sites. Keeping the site under consideration will not only result in the normal concerns of environmentalists and local residents (which you will get for all potential sites) but in addition you will have all the hassle of hundreds of Club shooters clamouring for the club to be kept open - or for you to find suitable alternative accommodation - which could prove harder than finding a suitable waste management site! This would be a nightmare for the council and a P.R. disaster.

17. Officer Response.

Comments noted. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the inclusion criteria for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that this site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 45 Type IND Name C Wilson Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I have to say I object very strongly to any Waste (home and business) Incinerator being built in Gloucester. The city has already been devastated by the massive housing policy, every bit of greenery, turned into housing estates despite opposition from locals. Our city air is already polluted from traffic, trading estates etc. If you HAVE to (and you do not) erect one, why not in an area which does not have to contend with these health damaging issues, out in the country away from residential areas. In addition. Lorries are meant to use the Barnwood bypass but many do not, driving along the already congested 'short cut' of the Hucclecote/Barnwood Road rocking the very foundations of houses as they pass by. If you were to build at the Triangle this would greatly increase. I would be interested to know how much of the capacity will be required for local waste and how much waste will you be be 'bringing in' to process. If that is what is proposed, why can't you send waste to an incinerator elsewhere? I trust you will listen to the people of Gloucester. Would you want one built on your door step. No, of course you wouldn't, so why inflict this money making operation on others.

17. Officer Response.

Comments noted. Dealing with each in turn. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. In terms of site location, clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. With regard to air quality, it should be noted that there are three Air Quality Management Areas (AQMA) in Gloucester. None of these are impacted upon by any of the potential waste sites. In terms of traffic, PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. With regard to importing waste, the council endeavours to deliver a solution to manage Gloucestershire's residual waste, not waste from outside the county. To promote flexibility of the solution and further recycling above the minimum 60% target, the council would be open to views on the treatment of Gloucestershire's commercial waste. It is important to note that household waste is only 25% of the total waste produced by Gloucestershire.

Number 34 Type ENV Name Dave Witts Organisation Severn & Avon Valley

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
3. Easter Park, Ashchurch		X	

4. Please give a reason for your answers to Question 3.

Dear Mr Riglar. We are writing to you concerning the possible location of a waste recycling site at Easter Park Tewkesbury, because it has come to our notice that you were the officer that added this site to the list without any investigations or consultations as to whether Easter Park would be suitable for this type of activity. The Severn and Avon Valley Combined Flood Group represents the eight different residents associations in Tewkesbury our member's number 1500+ and we have been asked to write our objections to using this site for waste disposal. Previously Easter Park was the location for Dowty Seals Ltd and over the years they had a number of pollution problems where dangerous substances were entering into the Tirlebrook nearby. There is also an underground stream that runs through the site and into the same brook. We believe that no matter what safeguards you put in to counter pollution problems they will not work. There is already a recycling company Smiths Recycling in the area and there is pollution seeping out into the near by Carrant Brook. When planning approval for this site was passed they said safeguards would be in place. The Easter Park sit is not suited for the purpose you say and not only that it is to close to the Northway estate. Please acknowledge this letter and we would be pleased if you would recommend it be taken from the list.

4. Officer Response.

Comments noted. Dealing with each point in turn. With regard to 'investigations into the site's suitability', this site, along with all other sites has been subjected to an extensive assessment process looking at various factors. The site was included in the consultation for a number of reasons including the fact that it comprises previously developed land, it enjoys good access to the A46 and M5, it is not in the floodplain, it has no significant biodiversity/ecological interests and has a landowner who is prepared to consider the development of a waste management facility on the site. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. In terms of pollution, whilst the former use of the site may have previously had problems, this does not mean a new waste facility would also do so. The planning and pollution control regimes are separate but complimentary. Pollution control is concerned with preventing pollution whilst planning controls the development and use of land. Waste planning authorities are expected to work on the assumption that the relevant pollution control regime will be properly applied and enforced. Furthermore, PPS10, states that 'modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health'. The Council is aware of the culvert running through the site but this does not preclude the possibility of development. Notably the site already has planning permission for employment use which could be implemented at any time. Whilst there are residential properties to the north, these are largely buffered by existing employment uses.
Notwithstanding the above, the site has not been taken forward into the publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is

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unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

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1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

The RSS has not been approved and ratified. Indeed, we have been promised that in the event of a change in government next year, it will be thrown out. However, even if this is the case, the JCS is proposing large new housing developments within Zone C, specifically at Ashchurch, Bishops Cleeve and Uckington. Waste sites should not be located within urban areas as they will have a detrimental effect upon house sales and prices and will put pressure on infrastructure that is already inadequate, for example drainage and traffic congestion.

2. Officer Response.

The South West RSS is potentially going to be abolished. Importantly however, the evidence that informed the preparation of the RSS may still be considered a material consideration. Furthermore, despite the potential abolition of the RSS, local authorities are expected to continue to progress their own development plan documents including waste plans, with enough land being provided for waste management facilities to support the sustainable management of waste. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. The effect of development, waste related or otherwise, on house prices, is outside the scope of the planning system.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch		X	
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

We can only comment on Site 3 option with any intelligent opinion and to a small extent on sites 1, 3, 4 and 10. The other options are not known to us and therefore we cannot give a considered and realistic answer. Sites 1, 3 and 10 at Wing moor already have problems with adverse public opinion from residents in Bishops Cleeve

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and Stoke Orchard. We do not believe that the road system in the immediate area can cope with an increase in traffic and any encroachment into the Green Belt is unacceptable. Site 4 Javelin Park we believe is a better option as it is not surrounded by domestic dwellings and the G.C.C. already own the land. Site 3 is the old Dowty Mining and Seals site which historically has had a big problem with pollution. There is a water course that flows above ground towards the site and below ground through the site, discharging into the Tirlebrook through a culvert under the A46. This stretch of road also floods frequently and in July 2007 was impassable, cutting off any travel between Tewkesbury, the M5 and Northway, Ashchurch, and the A46 towards Evesham. There is existing housing in very close proximity and, if the JCS proposals go ahead, at least 2,000 more homes will be built in Ashchurch. Site 3 is also adjacent to a busy Trading Estate. The map used in the Waste Core Strategy document is not up to date it does not show the underground stream running through the site and it does not show the 200 houses adjacent to the site at Saxon Park: This area has suffered enough with the floods of 2007 and continuing lack of flood alleviation measures and drainage problems. Many businesses in this area have closed and the residents and businesses of Tewkesbury, Northway and Ashchurch are working hard to regenerate our town which has suffered more than most following the floods and in the current economic climate. The floods of 2007 has already had a large impact on the value of housing stock in the GL20 area with a decrease in value of £30-40,000 and this was before the recession took hold. A waste disposal site at Easter Park will further exacerbate this situation. We suspect that if the site is built it will have an ever increasing impact on the area and we strongly believe that waste will be imported for disposal from other areas such as South Worcestershire. The residents would expect compensation for the devaluing of the value of their homes and business premises plus a reduction in their council tax on a year on year basis as the impact of the site increases. Pollution is a big worry especially as the proposed site is so close to domestic and industrial premises as well as natural water courses that feed the Severn River. No matter what controls or procedure you put in to control pollution they inevitably do not work this has been proven with the Smiths Waste Management site in Tewkesbury the planning application indicated that any pollution would be under control. Already we are having problems with pollution of the Carrant Brook a major tributary feeding into the Avon River. This site is valuable land which, if properly developed, will help our regeneration and could provide an excellent opportunity for a large retailer to locate here. We are already working to attract businesses to the area. If GCC elect to put a waste plant here then we would have no hope of improving the area and, in fact, stand to lose many of the businesses that currently occupy the adjacent trading estate. In short, a waste site here would be disastrous to our economy, employment and standard of living. A further, but no less important consideration, is the question of saleability of property in the area. Any search on a home or business premises in Northway will bring up a waste site within a given radius. This will affect any sale and devalue our property. Many homeowners in Northway have suffered insurance increases, property devaluation and purchaser objection due to the 2007 floods; it is outrageous that GCC should put further hardship on us all. Northway is designated a deprived area and we residents are trying very hard to change that and improve this area. We believe that waste site at this location will be the final nail in our coffin and we will take all possible measures to prevent it.

4. Officer Response.

Comments noted. Dealing with each in turn. Wingmoor Farm - Current public opinion concerning existing waste operations at Wingmoor Farm (mainly disposal through landfill) is outside the scope of this consultation, which focuses on identifying appropriate sites for residual waste treatment. The re-use/intensification of existing waste management facilities is consistent with national policy, however it is acknowledged that due regard must be had to the cumulative effect of previous waste facilities on the care and well being of the local community. In terms of traffic impact, PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. In terms of development within the Green Belt, whilst it is acknowledged that the Green Belt should generally be protected, PPS10, emphasises that local authorities should recognise the particular locational needs of some types of waste management facilities when defining detailed green belt boundaries and, in determining planning applications. In line with PPS10 companion guidance, should any sites within the Green Belt be specifically allocated within the WCS, it will need to be clearly indicated that they are for waste management purposes only. Javelin Park -Support for Javelin Park noted. Easter Park -With regard to Easter Park, the Council is aware of the culvert running through the site. With regard to the issue of pollution, PPS10,

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states that 'modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health'. In terms of flood risk, the flood risk assessment undertaken in support of the site options consultation demonstrates that the site is in a low risk Flood Zone 1. Notwithstanding this if any proposal of more than 1 hectare were to come forward, this would need to be supported by a detailed Flood Risk Assessment (FRA). In terms of proximity to housing, clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. In terms of the map being out of date, the Council has used the most up to date information available from Ordnance Survey at the time of printing. It is considered to represent an accurate reflection of current built development around the site. In terms of the impact of such a proposal on property prices, the effect of development, waste related or otherwise, on house prices, is outside the scope of the planning system. With regard to importation of waste from other areas the focus of the consultation is on identifying sites for managing residual municipal waste (mainly household). This waste stream is carefully controlled through a contract and any facility or combination of facilities would only deal with municipal waste from within Gloucestershire. In terms of the site being used for other purposes to assist with the regeneration of the area, it is important to note firstly that the site owner is willing to consider waste management on the site and secondly that waste management itself can have economic benefits in terms of job creation and re-using previously developed land. Retail policy is outside the scope of the WCS however in broad terms, a retail use in this location would be contrary to the sequential approach advocated in Government policy which requires new shops to be located in town centres first before sites away from the town centre are considered. In terms of impact on existing businesses, there is nothing to suggest that waste management facilities cannot co-exist with industrial development indeed they are acknowledged as compatible in national policy. It is important to note that the site has planning permission for employment use. The principle of development on this site has already therefore been accepted. Notwithstanding the above, the site has not been taken forward into the publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Disagree

6. Please give a reason for your answer to Question 5.

The Severn and Avon Group strongly disagree with the RSS and we formed part of the 35,000+ objections to it. We are concerned however, that even if it is thrown out, the JCS (Cheltenham Borough, Tewkesbury Borough and Gloucester City) are following Government and RSS guidelines in spite of huge public objection. It has been made clear that we don't want the level of housing increase that the RSS proposes. We believe that the need has not been proven and that the infrastructure will not support it. We understand the need to plan for the future but it must be done with restraint and sensibility. Incorporating waste sites into the RSS's proposed urban extensions is undemocratic and will exacerbate our current situation in areas around Tewkesbury which already have huge flooding, pollution and drainage

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issues.

6. Officer Response.

Comment noted. The potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I'm not sure/I don't know

8. Please give a reason for your answer to Question 7.

Question 7 assumes that the decision has already been made by GCC that the major waste site(s) will be located within Zone C. On Page 27 of the Consultation Document, you state that it is your "preferred strategy", not that it has already been decided. If the decision has already really been made, then what is the point of this "Public Consultation"?

8. Officer Response.

Paragraph 3.27 of the WCS Site Options consultation document states that Our preferred strategy is to focus the search for strategic municipal waste sites primarily on the area we have defined as 'Zone C'. Importantly Zone C is where most of Gloucestershire's waste is produced. Major housing and employment growth is also likely in this area. Treating this waste close to source is consistent with national and regional policy. It should be noted that this was the preferred strategy for the Site Options consultation. The purpose of the consultation was to see if the public / interested parties agreed with this approach. If, through responses to the consultation, there was a clear consensus from stakeholders including statutory consultees, Government Office etc that the preferred strategy is flawed a re-assessment of this approach may be needed. It should be noted however that 50% of respondents supported the strategy. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

We have no knowledge of the sites in question 9 and are, therefore, unable to comment. Hopefully, people local to the areas listed will be able to provide answers.

10. Officer Response.

Noted.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

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See answer to question 8. Is the GCC asking questions in a way that leads the public to give answers that you want?

12. Officer Response.

See previous response.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No

13. Officer Response.

Noted.

14. Do you have any comments on the Executive Summary?

We would like to see a more considered approach rather than a blind leading the blind course of action following a failing government's guidelines and a government appointed Regional Strategy draft policy which is by no means going ahead.

14. Officer Response.

Comment noted. The South West RSS will potentially be abolished. Importantly however, the evidence that informed the preparation of the RSS may still be considered a material consideration. Furthermore, despite the potential abolition of the RSS, local authorities are expected to continue to progress their own development plan documents including waste plans, with enough land being provided for waste management facilities to support the sustainable management of waste.

15. Do you have any comments on Section 1?

We do not agree with the principle of focusing the search for sites primarily in Zone C which runs through the Severn Vale and, as a result, is located at the lowest point and where the water table is highest. It does not avoid the flood plain as the current mapping and subsequent PPS25 is substantially flawed. Environment Agency maps only show FLUVIAL flooding and do not include PLUVIAL (rainfall) flooding. We also understand that the EA has two maps one for insurance company purposes and one for development; the floodplain in the development map is severely restricted.. It is impossible for the layman to identify the merits of every one of the 10 proposed sites inside Zone C and the 3 outside Zone C. We only have local knowledge of proposed sites that are close to our own locations. Neither are we likely to be aware of other unidentified possible sites inside or outside Zone C. However, in looking at the maps, sites 3, 5, 7, 8 and 9 are located very close to homes, places of business and employment and, in some cases, schools. One assumes that the people who proposed that waste should be disposed of as close as possible to where it produced would not like these sites on their doorsteps, so why should we? There is no explanation of what form the proposed waste sites will take. You have not taken a decision on what kind of treatment will be used and the effect each type of treatment would have on any area around any of the proposed waste sites. Whereas we understand that we need to find alternatives to landfill, we need to know how any new technology will affect us and where this technology already exists and is therefore proven and safe.

15. Officer Response.

Comment noted. In terms of flood risk, all sites have been subjected to a Strategic Flood Risk Assessment. None are located in a flood risk zone. Sites which were subject to flood risk were not included in the consultation document. Whilst parts of Zone C are located within the floodplain these locations have been avoided. Zone C also has the benefit of avoiding the largest area of floodplain located in the western part of the County. Respondents were not necessarily expected to comment on all 13 sites, nor were they expected to know of other sites that may be suitable, however clearly some respondents might be able to put forward suggestions as has proved to be the case. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning

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strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the `proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.

16. Do you have any comments on Section 2?

Many of us already re-cycle but the majority do not. There needs to be a stronger focus on prevention and reduction and this should focus on the manufacturers and retailers that have increased packaging to ridiculous levels in the last 30 years. People need to be educated as to individual waste disposal and perhaps this has to be done through their pockets with higher charges for certain unnecessary waste in their bins.

16. Officer Response.

Comments noted. There have been a number of initiatives in this direction such as the Packaging & Packaging Waste Directive (94/62/EC) and the subsequent Packaging (Essential Requirements) Regulations 2003 (S.I. 2003 No 1941), and the County Council welcomes these. 'Producer responsibility' is becoming a key focus in many new legislative changes. However the County Council does not make legislation so is limited in what it can do to bring about change. We do actively participate in a number of groups which lobby for changes in waste legislation such as the Local Government Association, the National Association of Waste Disposal Officers and the County Surveyors Society. We are also in regular contact with local retailers to ensure that we work as close together as possible to promote reduction and recycling messages. In addition to responding to legislative pressure, retailers and major brand owners have for the past 5 years been addressing packaging under the 'Courtauld Commitment'. This national voluntary agreement aims to cut down on the use of packaging materials, reduce their impacts and incorporate more recycled materials into packaging. We are aware of the benefits that the Courtauld Commitment is delivering and of its' importance in reducing the waste impacts of a large number of common household consumable items. Information on progress made to date is easily accessible via case studies and reports on the website of the Waste & Resources Action Programme (WRAP). In March 2010 a second phase of the Courtauld Commitment was launched. This aims to extend the programme deeper into the supply chain in order to multiply the benefits further.

17. Do you have any comments on Section 3?

Which map was used in identifying the flood plain? Was the map prior to 2007 or after the 2007 floods? We believe Zone C does not avoid the flood plain in some areas and takes no account of pluvial flooding. PPS10 Local Criteria: Site 3 is unsuitable for the following reasons:- Protection of water resources Visual intrusion in an area of residential and business occupation Traffic and access Air emissions and odours affecting nearby homes and places of employment Vermin and birds affecting nearby homes and places of employment Noise and vibration affecting nearby homes and places of employment Litter affecting nearby homes and places of employment Potential land use conflict - this site should be used for business that will improve and regenerate Ashchurch, Northway and Tewkesbury, not be detrimental to that regeneration. The area already suffers with traffic problems on a very frequent basis because the M5 Motorway is so close. Accidents north and south of junction 9 on the motorway cause traffic to be diverted frequently onto the A46 and A38 the area then becomes grid locked in a very short period of time.

17. Officer Response.

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Comments noted. The focus on Zone C ensures that the largest area of floodplain in the western part of the county is avoided. Whilst there are some flood risk areas within Zone C, the 10 sites identified avoid these. Any proposal of more than 1 hectare in size would in any case need to be supported by a site-specific Flood Risk Assessment (FRA). This would help to identify any local constraints in terms of pluvial flood risk. Dealing with the other comments raised. In terms of visual intrusion, modern waste management facilities tend to resemble industrial buildings and in broad terms would not appear out of keeping at Easter Park. The landscape assessment carried out for this site identified it as having high suitability in landscape terms. In terms of traffic and access, PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Notably for Easter Park, the highway assessment carried out identified a potential decrease in traffic compared to the situation if the existing permission for employment use were to be implemented. Odour, noise and vibrations are detailed matters that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any 'sensitive receptors'. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning conditions. A modern, well managed waste management facility will not attract vermin, birds, or generate litter. The waste will be delivered into an enclosed environment. It is a very different operation to landfill. Whilst the site has planning permission for employment use, importantly the owner is prepared to consider the development of a waste facility on the site. Modern waste facilities are very similar in character to industrial development. There is nothing to suggest that the development of such a facility would impact on the wider regeneration of this area, indeed it would create jobs and redevelop a vacant brownfield site. Notwithstanding the above, the site has not been taken forward into the Publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

18. Do you have any comments on Section 4?

The general comment we have is that we do not agree with the strategy of Zone C and placing waste sites in urban areas close to homes, schools, businesses and places of employment. Also, in or near an area subject to both fluvial and pluvial flooding As such, there will be huge objection to any planning applications that our local council receives and our Borough council (specifically Tewkesbury) will be under great pressure to refuse any application to build a waste plant at Easter Park. Therefore, deliverability in our area will be impossible within the proposed time frame and, we believe, subjected to every possible appeal process for as long as we can prevent any such a proposal blotting our landscape.

18. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source and the urban areas of Gloucester and Cheltenham and to a lesser extent Tewkesbury are where most of Gloucestershire's waste is generated. This approach is consistent with national policy in PPS10, which emphasises that planning strategies should 'provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities'. It is also pertinent to note that the companion guide to PPS10 states that, 'with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development'. None of the 13 sites identified in the site options consultation paper are subject to flood risk. They have been assessed in this regard by independent consultants Halcrow. Any sites where flood risk represented a potential hazard were excluded from the consultation. Any proposal for a waste treatment facility at Easter Park would be determined by Gloucestershire County Council, not

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Tewkesbury Borough Council. Whilst obtaining planning permission is acknowledged as a potential constraint to delivery it is not an insurmountable issue. The role of the WCS is to provide an agreed framework within the context of which any such planning applications would be determined.

19. Do you have any comments on the Sustainability Appraisal reports?

We cannot comment in full as we can find no accompanying SA reports provided in the package received. We can only read the summaries indicated at each site option. In these summaries we cannot identify what the numbered SA objectives are. For example, in Site 3, Stage 1 SA what are SA Objectives 1, 3 and 7 and 8 specifically to this location? Where is the aerodrome located? In Stage 2A what are SA Objectives 1, 3, 7, 8 and 11 specifically to this location?

19. Officer Response.

Comments noted. The SA Reports were available with all the other consultation documents on the Council's website, at all District Council Offices and local libraries and on request. An executive summary report was produced alongside the main report for ease of reference. The SA reports clearly explain each objective. A final SA report will be published alongside the publication WCS.

20. Do you have any comments on the Habitat Regulations report?

We cannot comment as we can find no accompanying Habitat Regulations (HRA) Screening Report.

20. Officer Response.

Comment noted. The HRA Screening Report was available with all the other consultation documents on the Council's website, at all District Council Offices and local libraries and on request.

Number 176 Type IND Name Barry Wood Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I do not support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Too restrictive

2. Officer Response.

Comment noted. It is essential that the WCS provides a clear strategy for the location of new waste management facilities. The focus on Zone C is consistent with national and regional policy and has been taken forward into the Publication WCS. On balance having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. Speculative proposals may however come forward where there is market demand. Such proposals will be considered on their merits against relevant criteria.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
4. Javelin Park, Haresfield		X	
5. Land adjacent to Quadrant Business Centre		X	
6. Land at Moreton Valence		X	
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works		X	

4. Please give a reason for your answers to Question 3.

Some areas are too close to existing habitation

4. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Disagree

6. Please give a reason for your answer to Question 5.

Too close to urban areas

6. Officer Response.

Number 176 Type IND Name Barry Wood Organisation not applicable/not provided

Comment noted. See previous response to Question 4.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

Flexibility

8. Officer Response.

Support noted. The focus on Zone C is consistent with national and regional policy and has been taken forward into the Publication WCS. On balance having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. Speculative proposals may however come forward where there is market demand. Such proposals will be considered on their merits against relevant criteria.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

13. Are you aware of any other sites that might be suitable for treating municipal waste?

Any site should be at least 5 miles from any significant habitation

13. Officer Response.

Comment noted. See previous response to Question 4.

Number 184 Type IND Name Christine Woodward Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Because Zone C is situated along the M5 corridor and it is necessary for the enviornment that the disposal of waste is considered.

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
3. Easter Park, Ashchurch		X	
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester		X	
8. Nastend Farm, Stroudwater Business Park		X	
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

Area 1, 2, 10 - Unsuitable. The increased volume in HGV traffic would have a serious effect on the not so major roads in the vicinity, also you have to remember there is a large population close by in Bishops Cleeve, and it would have a major impact on this community. Area 3 - Unsuitable. The volume of traffic on the A46 eastbound from J9 of the M5 is already dense at times and is the main feeder from the south west to east midlands. The remaining land is already allocated in the Gloucestershire Strategic Framework for industry and has strategicly important industrial development potential. The site is close to schools, resiential houses and high status industry. A waste site at that location would effectively prevent any further development of housing and industry in the area. More HGV's on this stretch of road would make it impossible for local residents, there is also a culvert that runs through this site which flows into one of the local waterways. If it was to be contaiminated, it would have a tremendous effect on the enviornment; this location is also densely populated within a few hundred metres including local schools.

4. Officer Response.

Comments noted. PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. In terms of impact on the local community, clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste

Number 184 Type IND Name Christine Woodward Organisation not applicable/not provided

facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. With regard to site 3 - Easter Park, the site has been subjected to an initial highway assessment and deemed suitable. Indeed, the assessment identified a potential net decrease in traffic compared to that which could be generated if the existing permission for employment use were to be implemented. Although the site has industrial development potential, importantly, the site owner is prepared to consider the development of a waste management facility on the site. Furthermore, although there are residential properties to the north of the site these are buffered by existing employment uses thereby minimising any impact. There are no schools within close proximity (250m) of the site. There is no evidence to suggest that waste management facilities inhibit other forms of development on sites nearby. The Council is aware of the culvert running through the site. PPS10, states that 'modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health'. Planning and pollution control regimes are separate but complimentary. Pollution control is concerned with preventing pollution whilst planning controls the development and use of land. Waste planning authorities are expected to work on the assumption that the relevant pollution control regime will be properly applied and enforced. Notwithstanding the above, the site has not been taken forward into the Publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

6. Please give a reason for your answer to Question 5.

Unsure

6. Officer Response.

Comment noted. The potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

If other sites are not suitable considering sites outside Zone C will provide more flexibility

8. Officer Response.

Support noted, however, on balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes.

Number 184 Type IND Name Christine Woodward Organisation not applicable/not provided

Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney		X	
3. Land at Lydney Industrial Estate, Lydney		X	

10. Please give a reason for your answers to Question 9.

The Council does not know the area very well. Lydney has a big housing development, it is a small town but with a high population

10. Officer Response.

Comment noted. Clearly the provision of new waste management facilities in or near urban areas has the potential to have some impact on existing occupants. However, it is important that waste is managed close to source. This approach is consistent with national policy in PPS10, which encourages local authorities to develop planning strategies that enable waste to be disposed of in one of the nearest appropriate installations. PPS10 also emphasises that planning strategies should provide a framework in which communities take more responsibility for their own waste and enable sufficient and timely provision of waste facilities to meet the needs of their own communities. Furthermore, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced) and that the most appropriate locations for residual waste treatment are likely to be existing and planned industrial sites within or near existing settlements. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. These sites will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the sites forward as allocations at this stage does not mean that the sites are unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

There may be a need for additional sites because of the quantity of waste produced. The more houses there are the more waste is created.

12. Officer Response.

Support noted.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

Not aware.

13. Officer Response.

Noted.

14. Do you have any comments on the Executive Summary?

Found the wording quite complicated

Number 184 Type IND Name Christine Woodward Organisation not applicable/not provided

14. Officer Response.

Comment noted. The consultation document has been drafted as simply and succinctly as possible. Unfortunately it is the case that waste is a complex subject and not all terminology can be simplified.

15. Do you have any comments on Section 1?

Not written in 'laymen's' english

15. Officer Response.

Comment noted. The consultation document has been drafted with plain English in mind and made as easy to read as possible. However it was difficult to avoid the use of jargon, abbreviations and acronyms altogether and waste is a technical subject. The publication strategy will be worded as simply as possible with a broad audience in mind.

16. Do you have any comments on Section 2?

No

16. Officer Response.

Noted.

17. Do you have any comments on Section 3?

Already answered

17. Officer Response.

See previous response.

18. Do you have any comments on Section 4?

No comment

18. Officer Response.

Noted.

19. Do you have any comments on the Sustainability Appraisal reports?

No

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

No

20. Officer Response.

Noted.

Number 138 Type IND Name Brett Woolridge Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	
10. The Park, Wingmoor Farm West	X	X	

4. Please give a reason for your answers to Question 3.

I and my family would object to more development on the Wingmoor sites due to: 1) Smells which cannot be good for you various times during the week are bad enough now. My kids are often saying to me "Dad, what's that horrible smell" 2) Lorry traffic is bad enough as it is 3) My son has cranial synystosis (where the skull plates are fused at birth). This is a rare condition but there are quite a few cases in Bishops Cleeve and that is just the ones we are aware of. Obviously, it cannot be proved but how many of these and other strange conditions are due to the emissions of Wingmoor sites. Please do not make the situation worse.

4. Officer Response.

Comments noted. Odour, along with issues such as noise and dust are matters that local planning authorities are required to take into account in testing the suitability of sites and areas for waste management. In particular, regard must be had to the proximity of any 'sensitive receptors'. Accordingly, the site options consultation identified all sensitive receptors within 250m of each site. However, where sensitive receptors do exist, this does not mean waste development cannot occur, as potential impacts can often be satisfactorily ameliorated through the use of appropriate planning conditions. In terms of traffic impact, the 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. For the Wingmoor sites, potential capacity issues were flagged up which are likely to necessitate mitigation such as junction improvements. Any strategic site allocation made in the Publication WCS will be supported by development criteria including transport and highways. Should a planning application be progressed on any of the strategic site allocations this is likely to need to be supported by a detailed Transport Assessment and Travel Plan. In terms of health impact, PPS10 also states that, where concerns about health are raised, waste planning authorities should avoid carrying out their own detailed assessments rather they should ensure, through drawing from Government advice and research and consultation with the relevant health authorities and agencies, that they have any advice on implications for health.' The WPA duly sought the advice from the PCT/NHS through the site options consultation.

Number 268 Type IND Name Paul Wormald Organisation MVV

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Focussing provision close to the centres of population should lead to efficiencies in transportation.However there may be ancillary functions required for pre or post teatment which will require further sitea and these may only be available outside of Zone C.

2. Officer Response.

Support for Zone C noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

From a preliminary review of the site it is obvious that at least Javelin Park is suitable. Time has not as yet permitted site visits to the other locations.in passing however we do note that a number of the sites are within the Green Belt and will therefore have to demonstrate appropriate levels of need.

4. Officer Response.

Support for Javelin Park noted. In terms of development within the Green Belt, whilst it is acknowledged that the Green Belt should generally be protected, PPS10, emphasises that local authorities should 'recognise the particular locational needs of some types of waste management facilities when defining detailed green belt boundaries and, in determining planning applications'. In line with PPS10 companion guidance, should any sites within the Green Belt be specifically allocated within the WCS, it will need to be clearly indicated that they are for waste management purposes only.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

6. Please give a reason for your answer to Question 5.

Difficult to tell at this stage what the implications are.

Number 268 Type IND Name Paul Wormald Organisation MVV

6. Officer Response.

Comment noted. The Government's intention to abolish the RSS casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I support the approach of identifying sites outside Zone C to provide flexibility and support for the main sites within Zone C

8. Please give a reason for your answer to Question 7.

As per the answer given above at Q2..

8. Officer Response.

See response to Q2.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

A flexible approach should be taken to the provision of sites outside zone C.

10. Officer Response.

Comment noted. Please see response to Q2.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I support the approach of using a combination of sites from within and outside Zone C

12. Please give a reason for your answer to Question 11.

As Q2 above

12. Officer Response.

See previous response.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

No comment.

13. Officer Response.

Noted

14. Do you have any comments on the Executive Summary?

No comment

14. Officer Response.

Number 268 Type IND Name Paul Wormald Organisation MVV

noted

15. Do you have any comments on Section 1?

No comment

15. Officer Response.

noted

16. Do you have any comments on Section 2?

The only real comment to make that although Strategic Sites are seen as important for delivery of Infrastructure and in particular the Municipal Waste strategy the possibility of usage of the identified sites to also deal with C and I waste should not be ruled out.

16. Officer Response.

Due to the importance and urgency of meeting LATS requirement the document primarily is on municipal waste. However due to the similarities between municipal waste and C&I waste there is the potential for sites to treat both. Out of the 10 strategic sites 9 of these would have the potential to be used for both waste streams. The council endeavours to deliver a solution to manage Gloucestershire's residual waste, not waste from outside the county. To promote flexibility of the solution and further recycling above the minimum 60% target, the council would be open to views on the treatment of Gloucestershire's commercial waste.

17. Do you have any comments on Section 3?

No comment

17. Officer Response.

Noted

18. Do you have any comments on Section 4?

Land ownership and the attitude of landowners may ultimately influnce deliverability of sites in real world scenarios.

18. Officer Response.

Comment noted. The importance of land ownership in terms of deliverability is fully acknowledged. In preparing the site options consultation paper, the Council only included those sites where the landowner was promoting a waste use. Sites with no prospect of delivery were excluded from further assessment.

19. Do you have any comments on the Sustainability Appraisal reports?

No comment

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

No comment

20. Officer Response.

Noted.

Number 100 Type IND Name Alice Wyndham Organisation not applicable/not provided

17. Do you have any comments on Section 3?

After reading up about the affects, costs and health concerns about Incinerators - I would sincerely like to ask you to set aside your proposals to install an incinerator in Gloucestershire and to look at the more healthy, and environmentally-friendly options, which are also cheaper for us all.

17. Officer Response.

Comment noted. At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. In terms of health impact, PPS10 states that 'modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health'. Furthermore, the detailed consideration of a waste process and the implications, if any, for human health is the responsibility of the pollution control authorities. PPS10 also states that, where concerns about health are raised, waste planning authorities should avoid carrying out their own detailed assessments .rather they should ensure, through drawing from Government advice and research and consultation with the relevant health authorities and agencies, that they have any advice on implications for health..' The WPA duly sought the advice from the PCT/NHS through the site options consultation.

Number 85 Type IND Name Miriam Yagud Organisation not applicable/not provided

17. Do you have any comments on Section 3?

I have just read the consultation document and completed the questionnaire. However I was very unhappy with what the GCC has asked me to participate in. The consultation report on the 13 proposed sites does not provide sufficient information on what use the proposed sites will be put to. To make an informed judgement on the suitability of the sites I need to be able to answer the question suitable for what? There is no information on how the use of these sites would impact on C02 reduction, traffic pollution, transportation and road maintenance costs, health and safety, environmental health and nature, and the overall and long-term costs to the local taxpayer. I have been reading about different ways to dispose of waste and I have discovered that the GCC has a range of waste treatment solutions available to it. Which ones is it considering? I would like to see a thorough discussion of these options BEFORE the GCC starts looking for sites and asking me to comment before I know what use they plan to put these sites. This consultation is happening before that discussion. Is that because the GCC have already decided what it wants and is asking me and the rest of the residents of the county to make hollow and ill informed judgements to rubberstamp an undemocratic planning process. I understand that GCC wants to build a big incinerator. I have seen NO information from GCC about how they plan to REDUCE waste production in the county. Why aren't they looking at making waste producers such as supermarkets and retailers responsible for their waste? Where are the feasibility studies for anerobic digestors? I have not seen evidence that the council has explored all the options available. I would object to the use of all the sites listed for possible waste treatment in Gloucestershire on the grounds that: If any of these sites could be used for incineration, I would oppose it. Incineration creates toxic fly ash residue which is toxic and dangerous and which has to be transported and buried creating a risk to nearby residents which is unacceptable. I understand that incineration contracts will be for at least 24 years, locking us into a solution which does not take account of the expected substantial reduction in the volume of waste nor of any newer more efficient and effective technologies which are being rapidly developed. The long term costs to the taxpayer will be higher with incineration. Incinerators act as a disincentive to reduce, reuse and recycle. The sites are not evenly distributed around the County, giving too little weight to the negative aspects of transporting waste and to the need for us all to take responsibility for the disposal of the waste we create in our own areas. Mechanical Biological Treatment (including Anaerobic Digestion) technology is a proven alternative that better satisfies the criteria you are obliged to use and is better for the environment and for the taxpayer. Large incinerators in other areas of the country are already deemed to be a mistake. I do not believe we in the UK can continue to lead wasteful and profligate lives producing more and more waste, and over consuming. Advances in technology and money from PFI are stopgap measures that only put off the day when we have to change how we live. I want the council to help my town make these changes.

17. Officer Response.

Comments noted. With regard to incineration, at the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. If the selected process were to generate APC (fly-ash) residues, these would be regulated by the Environment Agency through the Environmental Permitting regime. With regards contract length, the contract for any facility will be flexible around a range of waste volumes to account for both reductions in waste volumes and increased recycling. Gloucestershire needs a reasonable degree of certainty in respect of the availability of long term capacity rather than be at the mercy of market forces. Typically the length of contract correlates with the underlying economic life of the asset concerned. In terms of residual waste infrastructure this can be anywhere between 25 and 30 years. If procured over a shorter period the cost of the contract would increase significantly. With regard to reduction, re-use and recycling, 2007 Eurostat figures show that those European countries that use incineration as part of their waste disposal solutions have far higher levels of recycling than those who use landfill. Therefore it is not accurate to assume that incineration undermines recycling. With regard to the distribution of sites, the 13 sites identified in the site options included a range of sites across the county. Most were located close to Gloucester and Cheltenham as the main sources of waste in line with national policy and regional policy. The four strategic allocations identified in the Publication WCS are also located close to these main urban areas. A criteria-based approach will allow for facilities to come forward elsewhere where there proves to be market interest from the waste industry. The role of MBT as a waste recovery process is recognised. As specified above, the

Number 85 Type IND Name Miriam Yagud Organisation not applicable/not provided

Council is technology neutral and the sites identified are capable of accommodating a range of different processes. With regard to incineration being considered a mistake elsewhere, notwithstanding the Council's technology neutral approach, it is the case that there are currently a number of projects in the UK that are procuring for incinerators, or where incinerators are being built/operating. Furthermore, Europe relies on incineration heavily as a method for diverting its waste from landfill.

Number 379 Type IND Name Miriam Yagud Organisation not applicable/not provided

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I'm not sure/I don't know

2. Please give a reason for your answer to Question 1.

I have not been provided with enough information about how the council proposes to make use of the sites so I cannot make a judgement about whether sites in this or any other area will be suitable for the planned use. Further, no information has been provided to say how much waste and where it is coming from. I would not like to see mass transportation of waste travelling across the county or carried into the county as this would increase CO2 emissions and undermine any reduction and recycling efforts.

2. Officer Response.

Comment noted. Dealing with each in turn. Technology: At the present time, the Council is technology neutral. The 13 sites identified in the site options paper are capable of accommodating a range of different waste treatment technologies rather than one specific technology. The consultation explained that any site allocated would principally be for the treatment of residual Municipal Solid Waste (MSW). The site option consultation sought to ascertain the suitability of these sites in broad planning terms. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. Amount of Waste: In terms of the amount of waste to be managed, the site options consultation paper clearly explains that there will be a requirement for residual waste treatment (i.e. waste leftover after recycling and composting) of between 150,000 and 270,000 tonnes of municipal waste per year. Where the waste is coming from: The focus of the site option consultation is identifying sites for the treatment of residual municipal waste. This is waste collected by the Districts and disposed of by the County Council. As such it is simple to ensure the waste is sourced from Gloucestershire only. If a facility came forward and was managing both municipal waste and commercial and industrial waste it is acknowledged that it may be more difficult to ensure the commercial and industrial element is sourced only from Gloucestershire. Transport of waste: In terms of transport and the movement of waste, the focus on Zone C should help to reduce the movement of waste by providing strategic waste treatment facilities close to the main sources of waste arisings in the County namely Gloucester and Cheltenham. The movement of waste from further afield in the County will be facilitated through appropriate bulking and transfer facilities. CO2 emissions: The council requires a residual waste solution that is best value for Gloucestershire. GCC has a neutral stance on technologies and sites (whether multiple or a single site is proposed); however GCC recognises that the solution must be deliverable in planning, technological, environmental and financial terms. There are advantages and disadvantages of both single site and dispersed (multiple site) solutions. It should not be assumed that economies of scale mean an inflexible solution. Clarifications of flexibility can also vary between technologies, contract operation and risk. Flexibility will have many different definitions depending on the solutions that the council is offered during the procurement. Issues of flexibility can be dealt with through the evaluation framework and under the contract terms. It is important to note that smaller facilities do not necessarily reflect flexibility and scalability. The advantages and disadvantages would be investigated further during procurement process. Waste management and the move away from landfill are driven by the Climate Change agenda. Climate change is a wider issue which the development of this solution can positively contribute. Carbon footprint is assessed as part of the life cycle analysis. GCC will ask for details of emissions management as well as any other foreseeable environmental impacts and plans to mitigate these will be requested. DEFRA have commented on this issue directly by stating: The plans could also make an important contribution to the drive to tackle climate change by delivering estimated net carbon savings of 33,800 tonnes in 2020, compared to the current arrangements, or 64,700 tonnes if the final technology solution includes combined heat and power. Waste Reduction and Recycling: The Council is already doing a great deal to promote more waste reduction and recycling. The Council's target of at least 60% recycling/composting by 2020 is 10% higher than the national target over the same period. Irrespective of the location of strategic waste management facilities, and the movement of waste, there will always be an element of leftover or residual waste that needs to be managed.

Number 379 Type IND Name Miriam Yagud Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East			X
2. Areas A, B & C at Wingmoor Farm West			X
3. Easter Park, Ashchurch			X
4. Javelin Park, Haresfield			X
5. Land adjacent to Quadrant Business Centre			X
6. Land at Moreton Valence			X
7. Land north of Railway Triangle, Gloucester			X
8. Nastend Farm, Stroudwater Business Park			X
9. Netheridge Sewage Treatment Works			X
10. The Park, Wingmoor Farm West			X

4. Please give a reason for your answers to Question 3.

Please see my reply to Q1.I cannot make an informed judgement as I have not been provided with the information needed to know how the GCC plans to make use of the land.

4. Officer Response.

Comment noted. See previous response.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Strongly Disagree

6. Please give a reason for your answer to Question 5.

Urban growth is not a solution to housing need, it is a continuation of the existing growth policies promoted by central gov't. I would like to see GCC working together with local councils and other agencies to bring forward imaginative and creative housing plans that promote better use of existing stock, promotes neighbourhood cohesion. Its investment in people, not bricks and mortar that we need.

6. Officer Response.

Comment noted. The potential abolition of the RSS by Government casts doubt over the future implementation of the urban extensions. For this reason, although the evidence that informed the preparation of the RSS may still be considered material, it is not considered appropriate to give further consideration to the allocation of strategic waste sites within the urban extensions. Should any such developments go ahead, their waste management requirements will be addressed through the general policies and requirements of the WCS.

7. Do you support the identification of sites outside Zone C?

I'm not sure/I don't know

8. Please give a reason for your answer to Question 7.

See my response to Q1. The same applies. If the GCC provided sufficient information on how space would be utilised, I will be able to make an informed comment

8. Officer Response.

See previous response.

Number 379 Type IND Name Miriam Yagud Organisation not applicable/not provided

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

I cannot make an informed judgement as the information provided is insufficient for me to make an informed judgement

10. Officer Response.

Comment noted. The site options consultation included detailed site schedules of each site including factual information and a plan. It also provided an explanation of the Council's preferred strategy focusing on Zone C with the potential need to identify other sites outside Zone C. Further information was made available in the supporting evidence base. All of this information was made available on the Council's website, at all District Council Offices, local libraries and upon request. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. These sites will therefore not be taken forward into the Publication WCS. It should be noted that by not taking the sites forward as allocations at this stage does not mean that the sites are unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I'm not sure/I don't know

12. Please give a reason for your answer to Question 11.

Please see my reply to Q1.I cannot make an informed judgement as I have not been provided with the information needed to know how the GCC plans to make use of the land, transport access issues, health and safety etc.

12. Officer Response.

See previous response.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

There are a great number of sites available that could be considered for small, local and sustainable treatment of waste. If GCC explored the benefits of anerobic treatment of waste situated close to the areas the waste was taken from, it would find a number of suitable sites and the costs to the tax payer are very favourable, financially, in C02 reduction, less transportation (road damage) and poluution, creation oflocal jobs, etc.

13. Officer Response.

Following advice from Government Office for the South West (GOSW) and in accordance with PPS12, only allocations for strategic sites are to be included within the WCS. General criteria-based policies will be included within the Publication WCS to enable proposals for other sites to be determined against. Should a speculative proposal for a smaller site come forward, this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations. In order to identify the 13 sites within the document, a total of 329 sites were initially identified on a long-list of sites. These were reduced having regard to various factors such as site size, location, flood risk, highways and deliverability. Although there may be sites available in more isolated locations away from populated areas, locating strategic waste management facilities in these areas would be contrary to policy laid out in PPS10 and the Regional Waste Strategy which require waste to be treated close to source in accordance with the proximity principle. With regards to Anaerobic Digestion (AD), whilst some processes (such as MBT) may include an element of anaerobic digestion, this treatment method would not be appropriate for certain elements of the residual waste. All sites which

Number 379 Type IND Name Miriam Yagud Organisation not applicable/not provided

matched the inclusion criteria outlined in Technical Evidence Paper WCS-N have been investigated according to the methods also outlined in the paper.

14. Do you have any comments on the Executive Summary?

The report does not provide sufficient information on what use the proposed sites will be put to. There is no clear and definite information these plans would have on the impact on C02 reduction, traffic pollution, transportation and costs of road maintenance, health and safety, overall costs to the taxpayer. The GCC has available a range of waste treatment solutions available to it. Which ones is it considering? I would like to see a thorough discussion of these options BEFORE the GCC starts looking for sites. This consultation is happening before that discussion which suggests to me that the GCC may have already decided what it wants and expects me to make hollow and ill informed judgements.

14. Officer Response.

Comment noted. See previous response.

15. Do you have any comments on Section 1?

see answer to Q14

15. Officer Response.

See previous response to Q1.

16. Do you have any comments on Section 2?

see answer to Q14

16. Officer Response.

See previous response to Q1.

17. Do you have any comments on Section 3?

see answer to Q14

17. Officer Response.

See previous response to Q1.

18. Do you have any comments on Section 4?

see answer to Q14

18. Officer Response.

Comment noted. See previous response.

19. Do you have any comments on the Sustainability Appraisal reports?

see answer to Q14

19. Officer Response.

Comments noted. See previous response.

20. Do you have any comments on the Habitat Regulations report?

see answer to Q14

20. Officer Response.

See previous response.

Number 6 Type IND Name Mel Yates Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
2. Areas A, B & C at Wingmoor Farm West		X	

4. Please give a reason for your answers to Question 3.

I am writing to express my concern and bewilderment at the decision to use the land presently occupied by the Cheltenham and District Clay Club, for waste processing. This club has been operating for over 30 years and is an important part of the social infrastructure of the area. I would also challenge this plan with the following questions:- What provision and compensation will be made for shooting facilities if this site is used by the council and when? The area is semi rural with too much traffic from lorries already. Why more traffic? What compensation will the local residents receive when this traffic and waste recycling area effect the value of their property. Why would the area be burdened further with more waste recycling, hasn't it got enough? This site does not have wide roads for good access and is not close to the motorway, so why this site? Other sites are already vacant, so why this site? The club site is the only site with a social activity regularly on it in all seasons. Many years of hard work and investment has gotten the club and ground to its present situation. Over 400 trees have been planted and the ground managed to enhance the layout. This is not replaceable overnight. I would ask that the decision to use this site is reviewed sensibly and reasonably.

4. Officer Response.

Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the inclusion criteria for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that this site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

Number 216 Type DNS Name Ralph Young Organisation Director Of Environmental

1. Do you support focusing the search for strategic waste sites on 'Zone C'?

I support the approach of focusing the search for strategic waste sites on the area defined as 'Zone C'

2. Please give a reason for your answer to Question 1.

Zone C is a strategic location, central to Gloucestershire, closest to the major urban areas, with excellent road transport links which should minimise the amount of waste transport miles to the benefit of the environment.

2. Officer Response.

Support noted.

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East	X		
2. Areas A, B & C at Wingmoor Farm West	X		
3. Easter Park, Ashchurch	X	X	X
4. Javelin Park, Haresfield	X		
5. Land adjacent to Quadrant Business Centre	X		
6. Land at Moreton Valence	X		
7. Land north of Railway Triangle, Gloucester	X		
8. Nastend Farm, Stroudwater Business Park	X		
9. Netheridge Sewage Treatment Works	X		
10. The Park, Wingmoor Farm West			

4. Please give a reason for your answers to Question 3.

Easter Park, Ashchurch is less suitable for transport reasons due to its location on the Northern boundary of the County.

4. Officer Response.

Comment noted. PPS10 emphasises that waste management should be considered alongside other spatial planning concerns including transport. The 13 sites identified in the site options paper were subjected to an initial assessment by Gloucestershire Highways which helped to identify any key transport issues relevant to each site. Notably for Easter Park, the assessment identified a potential decrease in traffic compared to that which could be generated if the existing planning permission for employment use were to be implemented. Notwithstanding the above, the site has not been taken forward into the Publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

5. To what extent do you think that potential urban extensions to Gloucester and Cheltenham should be considered for waste treatment?

Neither Agree nor Disagree

Number 216 Type DNS Name Ralph Young Organisation Director Of Environmental

6. Please give a reason for your answer to Question 5.

Unable to comment

6. Officer Response.

Comment noted.

7. Do you support the identification of sites outside Zone C?

I'm not sure/I don't know

8. Please give a reason for your answer to Question 7.

At this stage I am unable to support the additional sites as I am unclear of the need for flexibility in addition to the main sites within zone C. If a need is demonstrated and proven then I may support additional sites.

8. Officer Response.

Comment noted. On balance, having regard to all of the issues raised and the level of additional waste recovery capacity needed over the plan period it has been decided not to include any strategic site allocations outside Zone C. The three sites outside of Zone C will therefore not be taken forward into the Publication WCS. It should be noted that by not taking a site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.

9. Please indicate whether the sites identified outside Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Foss Cross Industrial Estate, north of Cirencester			X
2. Hurst Farm, Lydney			X
3. Land at Lydney Industrial Estate, Lydney			X

10. Please give a reason for your answers to Question 9.

At present I do not have sufficient information to make a judgement.

10. Officer Response.

Noted.

11. Do you support the approach of using a combination of sites within and outside Zone C?

I'm not sure/I don't know

12. Please give a reason for your answer to Question 11.

At present I do not have sufficient information to make a judgement. If a need could be demonstrated and proven for using a combination of sites then I may support this approach.

12. Officer Response.

Comment noted. It is essential that the WCS provides a clear strategy setting out what will be built and where. This will provide certainty and confidence to the development industry and help bring proposals forward. The Council's preferred strategy is to focus the location of new strategic waste management facilities on the area defined as Zone C. This approach is considered to be consistent with national policy (PPS10) and the Regional Waste Strategy. Please also see response to Q8 in relation to sites outside of Zone C.

13. Are you aware of any other sites that might be suitable for treating municipal waste?

Number 216 Type DNS Name Ralph Young Organisation Director Of Environmental

No

13. Officer Response.

Noted

14. Do you have any comments on the Executive Summary?

No

14. Officer Response.

noted

15. Do you have any comments on Section 1?

No

15. Officer Response.

noted

16. Do you have any comments on Section 2?

No

16. Officer Response.

noted

17. Do you have any comments on Section 3?

No

17. Officer Response.

Noted

18. Do you have any comments on Section 4?

No

18. Officer Response.

Noted

19. Do you have any comments on the Sustainability Appraisal reports?

No

19. Officer Response.

Noted.

20. Do you have any comments on the Habitat Regulations report?

No

20. Officer Response.

Noted.

Number 261 Type IND Name Jason Young Organisation not applicable/not provided

3. Please indicate whether the sites identified in Zone C are suitable for treatment of residual household waste.

	Suitable	Not Suitable	Don't Know
1. Areas A, B & C at Wingmoor Farm East		X	
2. Areas A, B & C at Wingmoor Farm West		X	

4. Please give a reason for your answers to Question 3.

I am writing to you about the concerns I have with the possible location of another waste site in Stoke Orchard. The Cheltenham and District Clay Club is already located on this site and I do not support the approach of focusing the search for the waste site on the area defined as 'Zone C' because:- There is already lots of traffic to Wing moor Farm and the Stoke Road already struggles to accommodate volumes of large lorries. Wingmoor Farm is not central to Gloucestershire so not economical in terms of the extra miles travelled to get to it. There is already lots of waste and landfill around Bishops Cleeve and Stoke Orchard, so you will be burdening the area further. Other sites have much better access to major roads and motorways. Some sites are almost adjacent to the motorway. Several of the other sites are already vacant. Zone C is the only site with an activity already located on it and has had no provision mentioned for its continuance if this land is used. The Cheltenham and District Clay Club located in Zone C has taken over 30 years to establish itself as a distinguished Gun Club, producing and supporting many shooters of high standard who compete and qualify for England selection. The Club has taken many years and invested a substantial amount of money and time developing the landscape with the planting of over 400 trees. These enhance the layout for the sport and it is not something that can be easily replaced. The Club is of sentimental value and has close links to the local community, with memorial sites in place for founder members that have passed away. As mentioned above, members have run the Cheltenham and District Clay Club for over 30 years. It is well established with over 200 members who all have the same concerns as I. I would therefore be very grateful if you could take the objections outlined above into serious consideration. The loss of this Club will have a devastating affect to its members and the surrounding community.

4. Officer Response.

Comments noted. Area C of the Wingmoor West site was allocated in the Waste Local Plan as part of the Site A, Bishop's Cleeve Strategic Site and as such fulfilled the inclusion criteria for the original long list of over 300 sites (please refer to Technical Evidence Paper WCS-N: Site Selection Methodology). The site was also put forward by Cory Environmental and through exchanges of correspondence with officers from Tewkesbury Borough Council and a site meeting on 15th July 2009, it was confirmed that the land would be potentially available as a waste management solution providing that agreements were reached with the current gun club. (please refer to Technical Evidence Paper WCS-O: Site Call for Sites). Technical assessments were carried out on the site which indicated suitability for inclusion within the consultation document. Subsequent to the consultation, the County Council has sought clarification from TBC with regards their intention for this land. TBC has indicated that the Cheltenham & District Gun Club has a lease on the land until 2014. The land may become available then but in the opinion of TBC this is not guaranteed as the gun club have certain legal rights under Landlord & Tenant law. The Members of TBC have not been asked to make a decision on this land. As the County Council will be moving towards its formal final version of the WCS later this year including any necessary site allocations which need to be made, the County Council needs to satisfy itself that any site it allocates is central to the delivery of the strategy. In summary a site needs to be available and deliverable. In light of this latest position of TBC this seems to cast some doubt on the availability of this land for waste management purposes and particularly for some form of strategic waste facility. Due to these uncertainties concerning the availability of this land the County Council does not recommend that this site is taken forward as a formal strategic allocation for waste management in the WCS. It should be noted that by not taking the site forward as an allocation at this stage does not mean that the site is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.