



Session 6, Issue 5 – Specific Sites, WCS Appendix 5.

1. General Comments.

The Waste Core Strategy is, at heart, a land use planning document for waste facilities.

Under the PPS10 section heading "**Identifying land for waste management facilities**" which starts "Waste planning authorities should identify in development plan documents sites and areas suitable for new or enhanced waste management facilities for the waste management needs of their areas"; paragraph 18 states "In doing so, waste planning authorities should ... identify the type or types of waste management facility that would be appropriately located on the allocated site or in the allocated area".

Quite. Without identifying what processes are and are not permissible for each site, the WCS is of little use in guiding planning applications which is surely its main purpose. And yet appendix 5 of the WCS is woefully unspecific in its "Suitable Uses" sections, and clearly fails PPS10 in this requirement. Furthermore "Suitable Uses" does not have the force of "identify" [i.e. specify] that PPS10 requires.

Hence the WCS must clearly identify [i.e. specify], site-by-site, "the type or types of waste management facilities that would be appropriately located on the allocated site or in the allocated area". Unsuitable processes must either be named as such, or it must be clearly stated in the WCS that processes not specified are, by inference, unspecified because they are unsuitable for the particular site.

We are taking legal advice to confirm this requirement of PPS10, and should have counsel's opinion before the EIP.



2. Site No. 3, Javelin Park.

The WCS appendix 5 paragraph “suitable uses” against Javelin Park needs to be changed to comply with PPS10 as argued above. We suggest the paragraph should be called “permitted uses and processes”, and should include a list such as “All non-emissions processes such as MRF, MBT and AD are permitted. Combustion processes are limited to 68ktpa maximum to mitigate effects on European Sites and the Cotswolds AONB.” To comply with the Gloucestershire WLP CD11.8 para. 5.104, processes selected must also be the BPEO.

Under “Environmental Considerations” and “Key Development Criteria”, the paragraphs “Ecology/HRA” should have paragraphs added in the manner of the following: “Effects on the Cotswolds AONB, some 1km distant, should be considered in line with policy 26 of the Gloucestershire Waste Local Plan.”

Under “Key Development Criteria”, the paragraph “Landscape/Visual Impact” requires detailed discussion both because of the need for compliance with paragraph 5.104 of the Gloucestershire WLP CD11.8 and because it contains blatantly contradictory requirements. 5.104 of the WLP CD11.8 says “Proposals for waste development in AONB will need to demonstrate BPEO and will undergo rigorous examination *as will proposals for waste development outside AONB which could adversely affect the setting of these designated areas.* [Our italics emphasis].

Leaving aside the first paragraph for the moment, we think that the remainder of this section represents good guidance for compliance with WLP 5.104. The Cotswolds AONB is only a km away, and Javelin Park is looked down on from the escarpment within the AONB, including the nationally recognised beauty spot of Haresfield Beacon, the view of the vale from which is used in tourism literature, such as Cotswold Way publicity.

The guidance talks about techniques “to reduce the perceived scale of the facility with particular consideration to the Cotswold AONB” which is entirely in line with WLP 5.104. So the first paragraph then stands out in stark and complete contrast, saying as it does “There is the potential to create a landmark facility as a gateway to Gloucester to present a high quality architectural statement.” What does this mean? We believe this has to be seen in the context of the council just having selected, for this site, a massive structure some 50m high which we presume is intended to be “a high quality architectural statement”. Such a structure flies in the face of the remaining guidance in this section, and would be completely unacceptable in relation to WLP 5.104. We believe this first paragraph is a crude, blatant and cynical attempt by Gloucestershire County Council to provide a planning loophole for its intended course of action.

Hence for this section to be compliant with other requirements, the first sentence MUST be deleted. A whole range of waste processes would still be acceptable to meet all of the requirements of the Gloucestershire Waste Project on the Javelin Park site.

Comments have already been made above regarding the Habitats Regulations Assessment for this site, and associated applicability of the Gloucestershire Waste Local Plan.



3. Site No. 4, Land at Moreton Valence.

The WCS appendix 5 “Suitable Uses” paragraph for this site mentions “Primarily C&I with the potential for some MSW. The site’s EA Waste Management License gives it a current capacity of 291,310 tpa”.

This is woefully unspecific compared to the requirements of PPS10 paragraph 18.

GCC has recently given planning consent for a 32ktpa waste gasifier on this site, and the WCS, as a supposed land use planning document, would have provided no guidance whatever in relation to this planning application, demonstrating in a practical way that it is unfit for purpose.