

Waste Core Strategy Preferred Options Consultation Response Report



Summer 2008

Introduction

This report details the representations on the Waste Core Strategy (WCS) Preferred Options consultation which took place over a 6 week period between:

31st January and the 13th March 2008

Included is both a qualitative as well as a quantitative¹ summary of the main points and issues raised by respondents. This report also includes the County Council's formal response and some proposed recommendations.

The report is divided into seven sections – following those in the WCS Preferred Options Paper:

1. Introduction
2. This is Gloucestershire: A Spatial Portrait
3. The Vision and Strategic Objectives
4. Waste Reduction
5. Re-use, Recycling, Composting and Recovery
6. Locational Strategy
7. Monitoring / Implementation

It has been prepared in accordance with regulations 27(3) and 28(d) of the Town and Country Planning (Local Development) (England) Regulations 2004 (now replaced in part by revised regulations in June 2008) and the consultation requirements as per paragraph 4.10 of the Gloucestershire Statement of Community Involvement (SCI)²

The WPA's Responses to Representations and the Way Forward for the Waste Core Strategy

In this Response Report the Waste Planning Authority (WPA) will give a considered and reasoned response to the options within each section. However, for the majority of representations, at this stage the WPA is not in a position to definitively state what option or combination of options will be taking forward for the reasons stated below:

In their response to the WCS Preferred Options, Government Office for the South West (GOSW) provided strong advice that the WCS should seek to identify strategic waste sites. Their particular focus was the need for sites for the management of the residual element of municipal waste. This view was also echoed by the South West Regional Assembly (SWRA) as the Regional Planning Body (RPB). These representations accord with the County Council's view that reducing levels of waste that go to landfill and avoiding heavy Landfill Allowance Trading Scheme (LATS) fines is a high priority. Thus the next stage of the WCS will be technical appraisal, stakeholder involvement and consultation on options for strategic sites for managing municipal waste.

¹ This is presented in graphic form showing who responded and by what method. Tables throughout the document also indicate the level of support for options e.g. in terms of Total Representations / Support / Partial Support / Non-Support / Indication of a Preferred Option. It should be stated that given the relatively small number of respondents (52 for the main consultation and 87 in terms of the short questionnaire) it is difficult to infer statistical significance from the results; but as an indication of stakeholder preferences, this is helpful for the WPA.

² This states: "Representations received within the statutory period will be considered by the Minerals and Waste Planning Authority, who will publish copies of both the representation and our (GCC) consideration of them...As part of this consideration we (GCC) will show how representations have been incorporated (where appropriate) into the Minerals and Waste Development Plan Documents."

It should be noted that revised PPS 12 (June 2008) and new development plan regulations have amended the requirements for the original Issues & Options & Preferred Options consultation. This is now replaced with ongoing consultation and generation of options (new Regulation 25. Once these stages have been undertaken, the WCS will now progress with a Proposed Submission stage including strategic sites. In this process the stakeholder's comments, as detailed in this report, will be appropriately considered and reflected as the WCS moves towards submission to the Secretary of State. The new programme for WCS and other DPD preparation is outlined in the latest revision of the Minerals & Waste Development Scheme, available on the County Council webpage. In broad terms this will include consultation on strategic site options during summer 2009 before moving toward proposed submission stages.

Consultation

The Preferred Options consultation took the form of letters being sent to over 1400 stakeholders who are registered on the Minerals and Waste database, informing them of the consultation dates and the fact that all the relevant documents were available on the Council's website. Paper copies and/or CDs were available on request. Stakeholders were able to respond in the following ways:

- Via an on-line questionnaire (through a link from the Council's website);
- By email (to a generic email box) either using the questionnaire or additional comments;
- By post or by hand.

The majority of responses were received on time before on the last day of the consultation. The few 'late' responses were also duly considered.

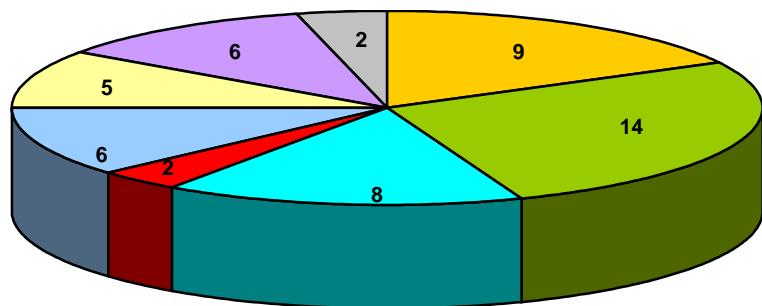
E-Government

48 respondents (92%) submitted their representations by electronic form. This include by email and the online version of the WCS Preferred Options questionnaire.

Stakeholder Analysis

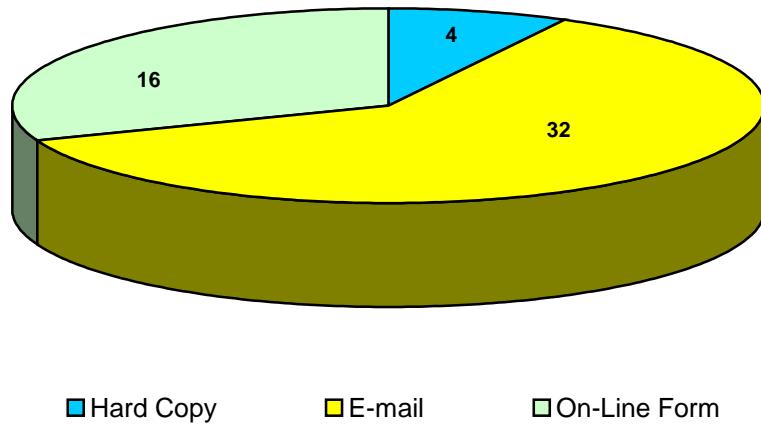
- 52 people / organisations responded to the main statutory consultation i.e. using the full questionnaire. (See Figure 1).
- A further 87 people / organisations filled in a shorter questionnaire which summarised some of the main WCS strategic objectives and options. The majority of these respondents did not provide a name or address – although a postcode was given in most cases. A detailed analysis of these questionnaires is attached as Appendix 3 to this report

Figure 1: Breakdown of the 52 respondents by type.



- Waste Industry
- Local Government
- National & Regional Government and Government Agencies
- Local Action Groups
- Environmental Groups
- Miscellaneous Organisations
- Individual Members of the Public
- GCC Officers / Members

Figure 2: Breakdown of representation methods used by respondents.



- Hard Copy
- E-mail
- On-Line Form

Section 1: Introduction

■ Summary of section

The introduction to the WCS Preferred Options Paper presented information on the purpose of the document, the nature of the evidence base (including reference to Waste Technical Evidence Papers and Joint Minerals and Waste Technical Evidence Papers), Community Involvement, Key Milestones and Planning Policy. There was also reference to the Climate Change agenda (linked to Gloucestershire's Community Strategy) and to the mandatory Sustainability Appraisal and Appropriate Assessment³ Reports that accompanied the Core Strategy as an integral part of the consultation process.

■ Summary of comments

Only one comment was received on the WCS Preferred Options introductory section.

Stroud District Council stated that because the document was not site specific, it was difficult to challenge specific sustainability aspects of the document. They also objected to the Community Engagement section (Paragraph 11) in that 'it appears to be an unsupported statement ...with no evidence of community engagement methods used...etc'. Figure 1 – The Waste Hierarchy was supported. Paragraph 19 – the link to climate change and the cross reference to the Community Strategy objectives was also supported by Stroud.

■ WPA response

The Waste Core Strategy has been prepared as a broad level strategic Development Plan Document (DPD) in line with the Government's Planning Policy Statement 12 (PPS12). The original intention of PPS12 was that more detailed work and the sites would follow the adoption of the Core Strategy e.g. in a Site Allocations DPD and a Development Control Policies DPD. Core Strategies were initially intended to provide an overarching strategic framework, but things have changed including new Government Policy (PPS 12) June 2008. Following strong representations from a number of respondents including GOSW, strategic waste sites for the management of residual Municipal Solid Waste (MSW) will now be included in the WCS. This is a key priority for the County Council and indeed for Local Authorities up and down the country, seeking to reduce levels of waste going to landfill and managing the prospect of potentially huge Landfill Allowance Trading Scheme (LATS) fines.

With reference to the Community Engagement / Involvement sections, full details are contained in the supporting Technical Evidence Papers WCS-MCS-2 Links with Districts & Neighbouring Authorities and WCS-J Waste Industry Involvement. The Minerals & Waste Planning Policy team have produced regular newsletters, held a number of waste forums, met with all the Districts⁴, with the waste industry and with various interest groups.

Stroud's support for the Waste Hierarchy, initiatives to reduce the impacts of climate change and linkages to the Community Strategy are welcomed.

³ Appropriate Assessment Reports are also referred to as Habitat Regulations Assessment Reports (HRA).

⁴ The Minerals & Waste Planning Policy Team met with officers from Stroud to discuss the WCS, cross-cutting issues and progress on District DPD preparation etc on 20th March 2007.

Section 2: This is Gloucestershire – A Spatial Portrait

□ Summary of section

This section of the WCS painted a spatial portrait of Gloucestershire, identifying strategically important issues. It outlined the administrative structures at the District, County and Regional level, and highlighted the key issues in terms of transport infrastructure, industry and the environment. It then considered and presented the most up-to-date waste data for Gloucestershire and pointed to supporting Technical Evidence Papers where more detail could be found. This data summary then informed the 'The Key Challenges for Gloucestershire' including 'reducing the amount of waste produced' which is the overarching objective of the WCS.

□ Summary of comments

For Section 2, there were 4 respondents as follows: (Note: additional comments on this Section may also be found in the 'General comments' section of this report).

Friends of the Earth Gloucestershire Network provided extensive comments on a number of aspects of the Preferred Options Paper as well as the accompanying Technical Evidence Papers. In summary their comments on Section 2 focused on waste data. They questioned the reliability of the data presented including the waste growth rates and assumptions about arisings. Due to the length of this representation it can be read in full in Appendix 1 of this report. The Council's Waste Management Team have also assisted with the consideration of this response as many of the matters raised were more appropriate for them in their role as Waste Disposal Authority (WDA) for example clarification of MSW data requirements. Specific aspects of the County Council response to this representation appear in Appendix 2 of this report, whereby generic matters are considered within the main body of the report

Government Office for the South West (GOSW) considered that the Spatial Portrait was a helpful and concise introduction, and that the targets for the main waste streams and the additional waste capacity required during the plan period were set out in Appendix B. However, they further stated: 'It would be useful for the document to project waste generation over the plan period so evidence is presented for the scale of the challenge and from which you would derive a timescale for the delivery of additional capacity'.

Smiths (Gloucester) Ltd expressed the view that while there were difficulties in terms of the data due to the complications of licensed and exempt activities, they were very concerned about the text of the WCS in Paragraph 41, Page 14 – derived from Technical Evidence Paper A 'Waste Data'. The figure for all managed waste is 1.2 million tonnes pa yet figures of 0.9 million tonnes are referred to for C&D waste activities. The implication is that only a limited amount of additional capacity is needed for the C&D waste stream, which Smiths cannot accept. The provision of 111,000tpa capacity would be woefully inadequate to deal with the volumes of C&D waste produced. Smiths further state that exempt sites are becoming more difficult to secure and there is an imbalance between the location of these sites (on the edge of the county) and the waste arisings (in the centre of the county). There should be a policy to encourage the development of as many recycling facilities as possible and notion figures can be an obstacle.

Stroud District Council objected to Paragraph 28 on the basis that it specifically identifies Sharpness Docks as providing extensive cargo-handling facilities and port-related services and further mentions direct links with Gloucester Docks. They state that the degree to which Sharpness can handle freight is questioned and it does not compare to the scale of the port facilities e.g. at Avonmouth. They further state: 'Paragraph 34 acknowledges the importance of international sites and this issue is supported. However Officers object on the basis that this recognition may impact on the ability of the Sharpness to act as a point of waste export or import as identified in the Plan. There is a policy tension not adequately addressed. Whilst Sharpness is recognised as a link in the waste transport chain, the proposals will generate uncertainty over potential impacts here from associated shipping growth and these impacts may be in combination with the growth envisaged by the Minerals Core Strategy. Tables 1 to

3 are broadly supported by Stroud but Officers object to the fact that the collection and disposal elements should be more closely linked in Gloucestershire. The Waste Core Strategy needs to address this. In Stroud's view the Districts would like to seek to ensure that each District deals with its own waste sources and minimises impacts and costs from waste transport. The key challenges for Gloucestershire are objected to in that it should include the significant future fines facing Gloucestershire on waste disposal.

■ WPA response

The EA, who provide the WPA with the majority of data, have been consulted at both local and regional level and raised no objections to the data.

The WPA has received support for the quality of its background data from the Regional Planning Body who state that '*the evidence base behind the options presented is sound*'. The RPB go on to state that '*the WPA's research summarised in its evidence base represents an up to date and authoritative assessment of current needs that supersedes research completed for the draft RSS. We find that the suggested capacity requirements in the evidence base and preferred options paper to be in general conformity with the ambitions of the draft RSS*'. Consequently the RPB found that the WCS Preferred Options document is in general conformity with the Regional Spatial Strategy and its policies comply with the sub-regional apportionments in the RSS.

Land & Mineral Management Ltd responded to the WCS PO document (as detailed in the general section of this report) by stating that the bewildering array of documentation is unnecessary and a waste of taxpayers' money. Additionally the RPB point out that '*the Core Strategy documents are not easy to read. There are numerous references made to the evidence papers, and we believe that there is more scope for setting out the key findings of the work behind the Core Strategies*'. The WPA considers that this is an unfortunate consequence of the new planning system, which requires the publication of evidence in advance of final documents, but to provide additional justification in the main document would by default lead to a more lengthy Preferred Options document. However, these comments appear at odds to other stakeholders who stated '*the documents are well presented and in particular make good use of helpful diagrams*' (GOSW), '*having looked through the document, we consider that it is well put together and clearly sets out the options proposed under each of the categories*' (Malvern Hills AONB Office), '*we appreciate the depth of analysis and the amount of work which has gone into it [the PO document]*' (SWARD), [*we welcome the approach and layout adopted in the Preferred Options Report*] (Cheltenham Borough Council). The WPA endeavoured to make the documents interesting and accessible for stakeholders and members of the public. It is however unclear which elements objectors consider the WPA should not have provided evidence about.

Municipal Solid Waste

Data for MSW was generally acknowledged by respondents to be good. The information is provided directly to the WPA by the WDA and it is on this basis that future provision for MSW facilities are planned. The WDA appointed consultants to assess the future needs of the County in terms of managing MSW. The WPA has not consequently sought to alter or amend this considerable body of research and has been guided by its detailed findings. The WDA consideration of representations made in respect of MSW data is contained in appendix 2 which includes clarification and update of projections. This will be considered in the next stages of the WCS preparation. In particular see responses in Appendix 2 to paragraphs 1.31 – 1.47 of the Friends of the Earth comments.

The need for residual waste treatment facilities is set out in the WDA 'Residual Waste Procurement Plan'. The WCS accordingly seeks to make provision in line with its requirements. A number of respondents have commented on the potential for utilising combined heat and power facilities (CHP). The WDA are investigating this issue and the latest position of the WDA is contained in Appendix 2 (see response to Friends of the Earth's comments 1.56 – 1.61)

Stroud District Council objected to Figure 6 in the WCS PO paper on the basis that it should show food waste being taken to Leominster. As drawn Figure 6 does not indicate where any

recyclates or IVC material is currently taken. Indicative destinations for the dry recyclates are set out in Table 1 in the Waste Data Technical Evidence Paper WCS-A. However, mixed organic waste was not included in this table. Stroud District Council go on to state that they would like to seek to ensure that each District deals with their own waste sources and minimises impacts and costs from waste transport. As part of the next WCS consultation food waste destinations will be added to the table to show Stroud's household waste being transported out of the County to Leominster (subject to that still being the case when the evidence base of the WCS is reviewed).

The issue of linking waste collection and waste disposal functions was raised by Stroud District Council and The Living Green Centre. The WPA wholeheartedly support joined up waste management and sympathise with members of the public who find the various responsibilities and schemes confusing. However the choice of what and how to collect/recycle waste in each district is a matter that is determined by the elected members in that area. Whilst this local authority function is one that could potentially benefit from unitary status across Gloucestershire, to ensure that the waste services are joined up at all levels, this is not a solution that is presently available, or is currently being proposed. Consequently the historical tensions referred to by Stroud District Council and the disparities set out by the Living Green Centre need to be overcome in other ways. The Joint Municipal Waste Management Strategy, which is prepared by the Gloucestershire Waste Partnership (GWP), comprised of the six district collection authorities and the County Council, is the appropriate vehicle for ensuring joined up collection and disposal/management services. All parties have now signed up to this harmonised approach, which intends to provide an enhanced waste management service across the two-tier local government in Gloucestershire.

The WPA will include reference in its 'key challenges' section to the need to avoid LATS fines so as to give greater focus to the WCS's MSW recycling/recovery policies and their implementation.

Commercial & Industrial Waste

Friends of the Earth raised questions about what they perceived to be an apparent 'over capacity' of C&I waste facilities. The Technical Evidence Paper WCS-A 'Waste Data' (para 83) identifies that there are a number of practical difficulties in distinguishing between recycling/transfer and treatment of C&I waste:

- Most operations classified as recycling facilities only bulk-up, or chip/pelletise the material for a further facility to process/ manufacture it into a marketable product. Consequently, 'transfer' facilities could fall under either RSS category.
- Descriptions of activities vary between EA waste management license records and the planning application/ permission information. In terms of data it is the EA who is providing the classification of how waste is managed.
- Different operators have different interpretations as to what they actually do on site – this then filters into their returns to the EA, which is then catalogued and passed on again to the WPA.
- Some C&I passes through facilities classed as being for MSW, and is therefore recorded differently.

Consequently it was concluded that in reality there is an element of crossover between recycling/re-use and recovery/transfer categories. This makes it very difficult to provide an accurate picture of the capacity gap and thus realistic future requirements. Notwithstanding this the WPA endeavored to make such a distinction in order to fulfill RSS requirements.

To make it clear to respondents how the 160,000 recovery treatment/transfer capacity is derived (as per Technical Evidence Paper WCS-A, page 20) it is comprised of (rounded figures):

- 10,000 t at Honeybourne Rd (Cotswolds)

- 10,000 t at Wilderness Quarry (Forest of Dean)
- 500 t at Old Station Yard (Newent Skips, Forest)
- 7,500 t at Canal Works Lydney (Forest of Dean)
- 32,500 t at Northern United Site (Forest of Dean)
- 27,000 t at Myers Road (Gloucester)
- 40,000 t at Moreton Valance (Stroud)
- 7,000 t at 'The Old Post Office' (Berkeley, Stroud)
- 25,000 t at Sandhurst (Tewkesbury)

The majority of these operations undertake skip hire type businesses and therefore they perform a mixture of transferring and treating C&I waste. Although some perform a specific service for segregated C&I waste the majority of the capacity is for largely transferral activities. Whilst the preference would have been to amalgamate these figures with the 161,000 C&I recycling/re-use total capacity, as it is likely that all sites perform all four (re-use/recycling/recovery/transfer) functions to some degree, in order to relate to RSS requirements a form of division was attempted by the WPA, as explained in Waste Data Technical Evidence Paper WCS-A (Pg 23).

For information the 161,000 recycling/re-use total capacity is comprised (rounded figures):

- 8,000 t at Lydney Industrial Estate (Forest of Dean)
- 100,000 t at Moreton Valance (Stroud)
- 2500 t at Thistledown Farm (Stroud)
- 50,000 t at Wingmoor Farm (Tewkesbury)

The diverted fraction of C&I was derived using the methodology set out in Section 7 of Waste Data Technical Evidence Paper WCS-A.

The WPA does not have arisings figures for C&I waste. The data is provided by the EA who provide the WPA with a managed figure at licensed waste management facilities within the County. C&I waste generation is therefore assumed to relate to the main centres of population in the County.

Metal recycling capacity in the County reflects a historical development of the industry. There is 24,000 t in Cheltenham; 20,000 t in the Cotswolds; 42,000 t in the Forest; 121,000 t in Gloucester; 35,000 t in Stroud (not including 125,000 t transfer at Sharpness Docks – shown separately in WCS PO document Table 2); and 15,000 t in Tewkesbury. The majority of the provision is located in the central Severn Vale corridor and appropriately reflects proximity to likely sources of local arisings.

Friends of the Earth commented that the data did not include sites which have been given planning permission which are not yet operational. This belief is incorrect. The example given by the respondent – the planning application for MBT at Cory's site, Wingmoor Farm – is still undetermined and remains held in abeyance at the applicant's request. Additionally, the additional capacity at Sunhill (which was intended for MSW use subject to contract) is still going through the planning process and at the time of writing remained undetermined. It would therefore be wholly inappropriate to prejudge the outcome of the planning process and include these in the permitted capacity. These UNAPPROVED additions appropriately therefore do not feature in the capacity totals.

Other sites (such as the IVC facilities at Dymock, Wingmoor Farm and Sharpness) have been included in the totals as they have permission, albeit they are not operational (at the time the evidence paper was prepared). Friends of the Earth's '*frustration*' (para 1.25) at not being able to understand these figures is not understood as the inclusion of these permitted capacities is clearly stated in the Waste Data Technical Evidence Paper WCS-A (paras 37 & 40). The WPA however acknowledges that the respondent's misunderstanding of the data could potentially have been avoided if it had been presented more explicitly in tabular form rather than stating it in the text. Notwithstanding this, the belief that there is an over provision of C&I treatment facilities is an incorrect assumption.

Friends of the Earth sought to further clarify their representation in respect of this issue (by e-mail 11/4/08) stating that the capacity in the county should include proposals that are in the planning system and are consistent with the existing Development Plan criteria. However, the respondent fails to realise that as a consequence of the Secretary of State's Direction (Oct 2007) the proposals are no longer on a development plan allocation. Notwithstanding this, the WPA does not consider it to be a prudent or sensible approach to determining capacity on the basis of proposals which have neither planning permission or a waste management license. Additionally, even if such a facility were eventually to be built it would be a contractual matter with the WDA if it were to use that facility for MSW. To only plan for the use of this facility prior to the contractual matters which need to be finalised would effectively give the operator a distinct advantage over other bidders and put Gloucestershire's tax payers at the mercy of one operator. This is not an approach which the WDA or WPA advocate. The WPA will further update the C&I waste data prior to the next WCS consultative stage if new information is available from the EA. The intention from DEFRA is that a central office hub would coordinate data and provide the necessary information to stakeholders. According to the EA this is still not readily available, therefore this may have a bearing as to what extent the evidence can be updated.

Construction & Demolition Waste

Respondents generally acknowledged and appreciated the difficulty in assessing C&D waste levels due to the system of 'exempt' activities comprising a substantial element of the waste stream. Technical Evidence Paper WCS-A 'Data' sought to overcome this by outlining the specific research undertaken by the WPA to ascertain the current provision within the County and hence any appropriate shortfall in facilities that needed to be planned for.

The representations from Land & Mineral Management (and then subsequently in almost identical representations from Smiths, Elliott & Sons and Allstone) centre around a concern that the WCS makes insufficient additional provision for C&D recycling facilities. **The WPA, based on the data available, reasoned on a figure of 111,000 tpa for additional C&D recycling capacity on top of the 520,000 t capacity already permitted. This goes substantially beyond the theoretical requirements of the RSS.** The WPA take the view that the emerging provision identified in the WCS is for additional C&D capacity and therefore ample opportunity is being made available for additional recycling capacity for the waste management industry.

The WPA supports the aim to divert as much C&D material from landfill sites as possible and consequently recognises that this needs facilities in which to undertake the screening and processing activities. The WPA also acknowledges the difficulty that seemingly arbitrary capacity figures can have for operators trying to secure planning permission for inert recycling facilities. Unfortunately this target driven approach is one that is advocated by PPS10, and although C&D waste is not included in the list of waste streams in PPS10 (para 8) the RSS, through the Regional Waste Management Strategy, has apportioned an amount to each waste sub-region, including Gloucestershire. If the WPA were to simply follow these figures then a reduction in provision would theoretically be necessary. Contrary to this the WPA acknowledges the concerns of C&D waste operators and in doing so has looked to wider national policy to support further inert waste facilities to divert this material from landfill. Consequently, to assist this approach the WPA needs additional throughput/arisings information from C&D operators as to the assumed capacity that they believe will be required above the 520,000 tpa already permitted plus the 111,000 tpa additional capacity required to meet emerging national diversion targets. However, another stakeholder has stated in their response that: '*The local authority must distance themselves from the waste companies who should NOT have input into these consultation processes. They constantly 'court' business and are not in this consultation process for anything other than their own commercial gains...*' (Sunhill Action Group).

The difficulty that some stakeholders are raising in terms of the waste data relates to the difference between the managed figure for C&D waste (provided by the EA), the 'exempt' amount of C&D material (estimated by Capita Symonds Report 2007) and the anecdotal arisings figures (which would be derived from industry). The EA managed figure for 2005 was 403,000 t. The 'exempt' figure is estimated at 500,000 t by Capita Symonds (Report 2007). In

terms of actual arisings, no alternative figures have been provided by industry. Objectors state that these figures require '*substantial adjustment*' yet no evidence is provided as to what they should be adjusted to.

'Exempt' operations are difficult to plan for, as pointed out in the Smiths representation. By their nature exemptions are generally related to either mineral site restoration, whose location is limited by the presence of workable minerals, or on-site mobile crushing equipment. Opportunities for tipping inert material are lead by restoration opportunities created by mineral extraction. By and large Gloucestershire's mineral sites are located peripheral to centres of population and at the extremity of the County. Whilst in many cases this may not be sustainable in terms of transporting inert material to the mineral workings for restoration, the location of quarries and pits is based on wider environmental, social and economic concerns than the desire for conveniently located voids into which to dispose of inert material.

Notwithstanding this, the WCS is closely aligned to the Mineral Core Strategy in this respect and the stakeholder's attention is drawn to the Technical Evidence Paper MCS-F 'After Minerals – Restoration, Aftercare, and Afteruse'. Whilst the MPA is not proposing new mineral extraction sites in the centre of the county (on the basis of a need for inert tipping proximate to urban extension areas) the MCS Preferred Options MPO12a & b look to support spatial priorities for restoration in the County. This could involve considerable restoration opportunities for example linked to restoring sand & gravel pits to level to overcome potential birdstrike issues around Fairford. However there maybe other parts of the County where mineral restoration opportunities might be available.

In terms of exempt crushing facilities, it is believed that following the new national requirement for large scale new development to be supported by a Site Waste Management Plan (SWMP) that additional mobile plant will be used on site, for which planning permission would not be required. Such facilities cannot be planned for but the WPA has been proactive in requiring this matter to be considered as part of planning applications through its SPD on 'Minimising waste in New Development Projects'.

The preferred approach, whereby localised facilities are determined based on criteria set out in a policy, was generally supported by attendees at a meeting of C&D waste operators, and subsequently at a wider forum event. It should be noted, however, that the WPA does not consider it appropriate to set out a policy giving unconditional support for an unlimited number of such facilities anywhere in the County. Bearing in mind potential changes to the content of Core Strategies brought forward through PPS 12 (June 2008), the WCS will address the strategic approach and criteria by which facilities for C&D management should be considered.

Landfill Voidspace for MSW and C&I Waste

The WPA was aware that information presented on the EA website in respect of landfill voidspace appeared to be inaccurate. Consequently the WPA undertook the 'obvious approach' of questioning the EA about this issue. In response the EA provided the WPA with landfill voidspace data that had been given to them directly by the operators themselves (the EA forwarded the e-mailed returns from the four main landfill operators in the County directly to the WPA). The WPA subsequently used this more detailed information in the WCS as referred to in section 8 of the Waste Data Technical Evidence Paper WCS-A.

The reduction in landfill voidspace since the close of the WLP inquiry reflects the use of some of that space for tipping, re-evaluation of site capacities by operators and also the change in co-disposal regulations in terms of hazardous waste. The operator of the hazardous waste landfill facility, in their response to the WCS POs, state that they believe confusion has arisen due to the changes following the combination of waste licences and their renumbering. The voidspace has since been reassessed by this operator as follows: at the 2007 base date, the non-hazardous void space on their site amounts to 3.7million m³ (the earlier estimate was between 2.75 - 3.95million m³ provided via the EA – the WPA had used the larger figure and hence the discrepancy), with a further 2 million m³ of hazardous voidspace. This represents a reduction of hazardous waste landfill voidspace down from the previous estimation.

C&I waste disposal to landfill sites in Gloucestershire has fallen over the period 1999 – 2005 and it is hoped that this trend continues. The WCS consequently does not make specific provision for additional C&I landfill capacity, being the lowest method in the waste hierarchy, given the currently permitted voidspace in the County. The amount of C&I waste being diverted has increased over the same period. The use of C&I treatment capacity in Gloucestershire for dealing with MSW is unrealistic, given the breakdown of what that capacity entails – largely local skip hire businesses which are not permitted, contractually or otherwise, to manage MSW.

Whilst the amount of C&I waste being landfilled in Gloucestershire has reduced, according to EA figures the total amount of C&I waste arising has fluctuated dramatically. The trend, either up or down, is therefore difficult to define, and regionally the SW RPB used a 0% growth forecast in their Waste Strategy. This was clearly stated in the Technical Evidence Paper WCS-A 'Waste Data', and to attempt to plan on the basis of an assumed reduction overall is not considered appropriate. It is also not accepted that reducing the gate price at C&I waste recycling facilities, through allowing greater competition in the market, will undermine the drive to move these wastes away from landfill. The WPA is not seeking an over provision of disposal facilities – as asserted by Friends of the Earth (See Appendix 1) (pg.5). The increased competition provided by addition diversion facilities in accordance with PPS10 (para 3), which states that WPAs should prepare plans that '*encourage competitiveness*', should assist in driving waste up the hierarchy. Further, it is also not accepted that by 2010 there will be '*little or no residual landfill demand for C&I waste*', as claimed by Friends of the Earth (para 1.14). It is considered to be highly likely that there will remain a need for C&I waste disposal (landfill) facilities, especially given the concern communities have for waste recycling/composting facilities.

Notwithstanding this discussion the WPA will further update the landfill void space data prior to the next WCS consultative stage if new information is available from the EA. The intention from DEFRA is that a central office hub would coordinate data and provide the necessary information to stakeholders. According to the EA this is still not readily available therefore this may have a bearing as to what extent the evidence can be updated.

Use of Sharpness Docks

Stroud DC made representations that they are concerned that Sharpness Docks is referred to in the WCS spatial portrait as '*providing extensive cargo handling facilities and port related services*' (WCS PO paragraph 28). They consider that the docks should not be used as a strategic waste facility and question the freight handling capacity. Stroud DC further state that the docks are in '*decline*' and that any waste proposals '*will generate uncertainty over potential impacts here from associated shipping growth*'. Notwithstanding this apparent contradiction the WPA does not accept this position.

Contrary to Stroud DC's assertions the docks are already used for a number of waste facilities, not least as a substantial metal waste transfer facility with capacity for handling around 200,000 tpa. The port's owners state that '*Sharpness Dock at the head of the Bristol Channel handles ships of up to 6,000 tonnes (with cargo), maximum beam 16.76 m and unlimited length. Sharpness offers excellent road, rail and motorway links. The Port is experienced in handling a diverse range of cargoes including dry bulks, minerals, timber and many other products, using modern quay-transfer equipment and has extensive open and covered storage including grain silos*'.

The use of the docks are also supported by the owner of the land around the docks, British Waterways, who were a key promoter of the site (at the WLP public inquiry) and clearly they do not share Stroud District Council's reservations about continuing waste uses in the dock area. The impact on nature conservation sites is a key issue and one that was thoroughly considered by the Inspector at the WLP inquiry and would be considered again should any proposals in this area be considered.

Other stakeholders have responded to the WCS by stating that Sharpness Docks should be used as a strategic waste site (see WPA consideration of representations to WPA PO Section 6 Locational Strategy).

Section 3: The Vision and Strategic Objectives

■ Summary of section

This section sets out the preferred option for a spatial vision and strategic objectives for the sustainable management of waste in Gloucestershire. It detailed how the vision and objectives were drawn up taking account of the views of local stakeholders at forum events, through the Issues & Options consultation and drawing on a number of key documents that also set out 'visions' for the County.

WPO1:

By 2026 Gloucestershire will be a clean, green, healthy and a safe place in which to live, work and visit. It will be a County whose inhabitants proactively minimise waste production to achieve zero growth by 2020 and where opportunities for re-using and recycling waste are maximised.

This will be delivered through a sustainable waste management system that: raises public awareness about waste minimisation; views waste as a resource; provides everyone with localised access to recycling facilities; supports markets for recyclable materials; and delivers a network of sites that enable maximum diversion of waste from landfill. Sufficient waste management facilities will be provided to enable all households in Gloucestershire to recycle and compost at least 70% of their rubbish by April 2010, with an 80% participation rate by 2020. Gloucestershire's communities, key landscape / environmental assets and land liable to flooding will be safeguarded from the adverse impacts from waste management activities. Major waste facilities will be located in the central area of Gloucestershire proximate to the main urban areas along the M5 corridor. Smaller supporting facilities will be dispersed around the County

WPO2:

A. To influence Gloucestershire's residents to reduce the amount of waste they produce through raising awareness of waste issues. And then subsequently to encourage them to view any waste they do generate as a resource for which they must take communal responsibility.

B. To make the best use of Gloucestershire's waste by encouraging competitive markets for goods made from recycled materials and obtaining a benefit (value) from left over (residual) waste materials.

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.

■ Summary of comments for the above Spatial Vision

WCS Options	Total representations on this option	Supported the option	Partial support for the option	Did not support the option	Those considering it to be their Preferred Option
WPO1	30	14	13	3	Na.

A variety of comments were made on the vision as detailed below:

Gloucester City Council stated that an alternative or alternatives to the preferred spatial vision was not offered and that these do need to be explored in a systematic manner. They also consider that given ambitious renewable energy targets, proximity of a heat market may be a factor to be included in any vision and strategic objectives.

Stoke Orchard Parish Council expressed the view that 'air quality' needed to be a consideration in the vision, along with landscape and environmental assets, given that c.20,000 people in the County suffer from landfill gas intrusion and loss of amenity.

Allstone Sand and Gravel suggested that waste management facilities should encompass all categories of waste streams e.g. C&D and industrial. Para 3 only refers to households, there is a request for this to be amended.

Ashchurch Parish Council considered that safeguarding areas that flood from the effects of waste disposal is crucial. The flood levels of 2007 should be considered and well as potential increases due to global warming. The EA should be involved.

Friends of the Forest considered that whilst the targets were very 'laudable', some were very challenging. They also expressed concern that some important matters have not been taken into consideration i.e. work to date that has produced the proposed options.

CPRE (Gloucestershire Branch) considered that the zero waste reproduction by 2020 target was too challenging given the rising population in the County, but it is in everyone's interest that it is met. Raising public awareness is vital. Locating major waste facilities close to the main urban areas along the M5 corridor was supported.

Elliot & Sons Ltd considered that there should be sufficient waste management facilities for all waste arisings, not just for household waste.

The Waste Disposal Authority stated that the vision reflected that in the current Joint Municipal Waste management Strategy (JMWMS).

Wiltshire County Council stated that the proposed vision 'presents a clear and ambitious set of aspirations to be delivered through the emerging Waste Development Framework.

Cllr Venk Shenoi – Forest of Dean District Councillor considered that the targets for recycling and composting should be referred to as base year percentages as percentages will reduce progressively as landfill diversion increases. He advocated the use of Anaerobic Digestion for food waste and a modern MRF to help deal with recyclables more efficiently.

Friends of the Earth (Forest of Dean) expressed the view that the vision needed to be reworded to underline the importance of involving local communities – to encourage them to take more responsibility for their own waste. The vision should also promote increased source segregation to increase recycling rates. The following wording was requested: 1. Actively involving local communities by decision making and action on waste to be a local community responsibility. 2. Intend to maximise the range and quality of materials to be separated at kerbside. 3. Recycling to reach a target of 70% recycling and 80% participation rate by 2010. 4. Small residual waste facilities (20,000 – 40,000 tpa) on small sites around Gloucestershire for local need and choice of facility resting with the host community. A request was made to delete reference to 'Major waste facilities' as in the view of FoE there is no requirement for them in Gloucestershire.

Mrs N Ginn expressed the view that there was not enough emphasis to force recycling through to residents. She considered that the targets were 'pitifully low' both for 2010 and 2020 and that the location of waste facilities is flawed in its logic. She considered that the vision was lacking in substance and the notion of 'encouraging' residents was laughable.

Government Office for the South West (GOSW) stated that the Core Strategy should have a clear vision that is couched in spatial terms that is locally distinctive and gives an idea of what Gloucestershire will be like by 2026. They welcomed the inclusion of specific targets but considered that the vision should '...be more specific about the types of facilities it refers to in each place'.

The South West Regional Assembly agreed with the preferred spatial vision.

Grundon (Waste) Ltd stated that the vision places too much emphasis on household waste and recycling / reuse. It makes no reference to residual waste treatment (recovery and landfill) or to other waste streams. As such they consider it is deficient. The reference to 'the central area of Gloucestershire proximate to the main urban areas along the M5 corridor'

appears to prejudge the later locational options at WPO7 and such wording should be amended or deleted.

Haresfield Parish Council considered that the document loads the questions in a way that favours a centralised waste disposal plant. They stated that the recycling figures quoted could be far better and added that District Councils need to work together more closely to improve recycling rates. They highlighted a number of anomalies present in the collection of Gloucestershire's recycling including e.g. green waste, plastic tops, cardboard etc collection in some Districts but not in others. They expressed the view that major waste facilities were not the way forward as they were a crude and 'quick fix' method, and not necessarily the best for the environment. By considering the sighting of a waste site on the M5 corridor can only mean consideration of the disposal of waste from outside the County. The Parish Council were concerned that Gloucestershire could become 'a dumping ground for the rest of the South West'. They considered that residual waste should be disposed of in local sites which offer more flexibility and discourage waste from outside the County. If recycling rates were higher and companies cut down on packaging there would be little need for a large disposal plant. The Districts should take responsibility for their own waste and e.g. the Cotswolds should not dump rubbish on Gloucester.

Hills Minerals and Waste Ltd considered that the interim spatial vision contained in the Issues and Options Part A should be expanded to "A sustainable and educational waste management system for Gloucestershire that will achieve material reductions in waste produced from businesses and households as a priority; ensure sufficient facilities are in place for the sustainable management of the County's waste and divert it from Landfill". They also state that the objective to ensure that there are adequate facilities to deliver the waste management system in Gloucestershire should be stated. They express the view that currently in Gloucestershire there is a shortage of inert waste landfill sites which means that waste soils are being transported long distances.

Clearwell Quarries Ltd expressed the same views of Hills Minerals and Waste Ltd.

Land and Mineral Management expressed the same views as Hills Minerals and Waste Ltd and also added that there should not just be a focus on waste management facilities for households. Other waste streams e.g. industrial, commercial should be considered.

Mr D. J. Luckett expressed the view that more doorstep recycling was needed. 'To achieve 80% participation rate by 2020 one would expect some form of legislation.

The Member of Parliament for Gloucester stated that he largely supported the spatial vision but had a number of concerns, as follows: Little in the vision statement which encourages businesses operating in Gloucestershire to reduce the amount of packaging. Recycling targets are encouraging, but without better cooperation between District councils, these targets may not be reached. Problem of different Districts running different recycling schemes. All Gloucestershire residents should have access not only to local recycling facilities but also local facilities in which they can dispose of their residual waste. Plans for a major waste facility in the central area of Gloucestershire close to the M5 corridor could encourage waste to be brought in from other areas outside of the County – this could have negative environmental impacts. He was of the opinion that smaller district wide sites would be preferable to a major waste facility – they would not have the capacity to accept waste from outside of the County and travel distances would be shorter.

The Highways Agency supported the preferred spatial vision in principle. They stated that, as advised during the Issues & Options consultation, facilities should be located within the strategically significant towns and cities such as Cheltenham and Gloucester as identified in the RSS. The preferred vision goes some way towards meeting the Agency's advice. However the vision should indicate that all facilities should be on previously developed land and for major facilities a sequential approach should be adopted with the strategically significant towns and cities being the preferred option. All waste facilities should be located to minimise adverse impacts on the Strategic Road Network.

The Forest of Dean District Council supported the vision but expressed reservations as to whether the 70% and 80% targets would be achievable.

Smiths (Gloucester) Ltd considered that the vision focused too much on providing waste management facilities for household waste and should cover other waste streams as well, such as commercial and industrial waste.

Cheltenham Borough Council offered strong support for the preferred vision. In particular the distinction between major strategic sites, which should be in strategic accessible locations, from smaller local sites that should be positioned close to waste arisings.

Stroud District Council objected to the spatial vision because it prejudgets the choice of options in Section 6 – it is not consistent with Option WPO7a that considers a wide area of search based on RSS Policy W2.

Sunhill Action Group expressed concern that the locational diagrams were not detailed enough, therefore not showing the diversity between the 'solid colours'.

Safety in Waste and Rubbish Disposal (SWARD) provided a fairly lengthy statement on the vision. They stated that they believed that 'zero waste growth by 2020' is a defeatist approach, and considered that by 2020 it is feasible to achieve 'de-growth' i.e. a reduction in the overall quantity of waste generated. They suggested the inclusion of the following supporting paragraph: 'In raising awareness the County will actively encourage householders to reject purchases of non-recyclable products / packaging and to demand products / packaging which are recyclable.' They considered that such an explicit statement was necessary to make the Secretary of State aware of the seriousness of the Council's intent. In relation to the final supporting paragraph they advocate 'smaller supporting facilities' and not just transfer facilities close to settlements – having the effect engendering opposition therefore pointing to the consequences of consumption lifestyles.

The Environment Agency supported the spatial vision and welcomed the reference to re-use as requested at the Issues and Options stage of consultation. The paper should not be too locationally specific as there must be scope to assess proposals for their benefits and disadvantages against a range of material considerations. Broad locations are appropriate and it makes sense for the major waste facilities to be located within close proximity to the biggest urban areas as these are likely to be the biggest producers of waste.

West Gloucestershire Green Party stated that in their view there had been insufficient consultation on the vision e.g. no public consultation events in the Forest of Dean. The only wider consultation events they were aware of were two selected stakeholder group days and thus the consultation exercise was flawed.

■ Summary of comments for the above Strategic Objectives

WCS Options	Total representations on this option	Supported the option	Partial support for the option	Did not support the option	Those considering it to be their Preferred Option
WPO2 A	25	18	6	1	Na
WPO2 B	25	18	6	1	Na
WPO2 C	25	24	1	0	Na
WPO2 D	26	23	3	0	Na
WPO2 E	25	14	11	0	Na

A variety of comments were made on the Strategic Objectives as detailed below:

Safety in Waste and Rubbish Disposal (SWARD) considered that Strategic Objective A needed strengthening with references to waste reduction by design. In relation to Strategic Objective B they considered that this also needed strengthening – encouraging residents to buy goods made from recycled materials. Objectives C and D were fully supported. E was supported provided that all cumulative impacts were taken into account.

Allstone Sand and Gravel questioned how some of the objectives could be delivered through the planning system. There need to be mechanisms within the objectives that enable changes to be made in response to economic variations throughout the lifetime of the plan.

Ashchurch Parish Council broadly supported the strategic objectives.

Friends of the Forest commented that co-location might be incompatible with reducing the carbon footprint of managing the County's waste.

CPRE (Gloucestershire Branch) made the following representation: A – Taking responsibility will be vital, B – We suggest this objective will be difficult to achieve, but this is the right direction of thinking, C – This objective has CPRE's full support, D – The proximity principle in managing waste is supported: transport impacts are a particular concern, E – Making maximum use of existing waste sites, wherever possible, should be a high priority.

Elliot and Sons Ltd questioned how some of the objectives e.g. A & B could be delivered through the planning system. Planning needs to be responsive to market fluctuations / variances which can rapidly change recycling activities.

The Waste Disposal Authority stated that raising awareness of waste issues (Objective A) itself does not lead to reduce waste, but prefer instead to aim for 'behaviour change'. This requires a much more engaging from of communication and involvement. Objective D uses the term 'reasonable distance'. What is the definition of reasonable? 'In any case, we believe that the impacts of waste management should be considered systematically to incorporate the complexities involved in finding the best overall solution. This is not reflected in the wording of Objective D'. Objective E should also specifically include 'Brownfield' sites.

Wiltshire County Council stated that the proposed strategic objectives were laudable and covered the appropriate range of issues. Option B was particularly supported, but questions were raised as to how markets could be created.

Cllr Venk Shenoi – Forest of Dean District Councillor was of the view that all the objectives were worthwhile and it was difficult to allocate a rank order, but compromises will have to be made based on the economic application of the principles stated.

Friends of the Earth – Forest of Dean considered that B was open to different interpretations and that further clarification was needed. They did not accept incineration in any form, but added that the best use of waste was to recycle to the maximum potential. In terms of E they considered that in rural areas a scattering of sites might be more appropriate than a concentration.

Mrs N. Ginn stated that the objective ideals were fine but there was not enough emphasis on implementation and enforcement. Waste will not be reduced until people are given the tools and are forced into action. Doorstep collections need to be more diverse allowing for more recycling.

Government Office for the South West (GOSW) stated that the objectives should be more specific and measurable in order to focus the strategy on outcomes and as a means to measure plan performance. They generally supported the scope of the objectives, but expected them to encompass the targets contained in Appendix B.

Grundon (Waste) Ltd suggested that the issue of cumulative impact should be added to Objective E, as well as in Section 7 under the delivery mechanism for E. They considered that there was an overarching objective which should be added which should: 'seek to provide for Gloucestershire's identified waste management needs and requirements with a broad range of facilities to cater for all waste streams and their treatment and disposal to meet national, regional and local needs and targets linking the RSS and Waste Strategy 2007'.

Haresfield Parish Council considered that the objectives were clear. The document talks in terms of managing 'the majority' of Gloucestershire's waste when it should be talking in terms of managing all of Gloucestershire's waste. They expressed the view that there should be several waste sites dotted around the county and that these should be on previously developed land, but with a consideration of the impacts of resident nearby. They expressed the view that what was needed was leadership in terms of the partnership between the waste collection and disposal authorities.

Hills Minerals and Waste Ltd were of the view that Objective D should be expanded by stating how the objective will be achieved. They suggest: "To reduce the environmental impacts of transporting waste by manage Gloucestershire's waste within a reasonable distance from its source of arisings by ensuring that sufficient facilities are in place to manage the waste sustainability and to encourage the use of sustainable transport." They considered that Objective E requires additional flexibility to be achieved through the EIA process and that the opportunities to develop waste management facilities in working / exhausted / restored quarries should be recognised.

Clearwell Quarries Ltd made similar representations to Hills Minerals and Waste Ltd, requesting an expansion of Objective D and additional flexibility for Objective E.

Land and Mineral Management Ltd concurred with the views of Hills Minerals and Waste Ltd and Clearwell Quarries in terms of Objectives D and E. In terms of Objectives A and B, they considered that it was not easy to see how these could be achieved through the land-use planning system.

Malvern Hills AONB Office stated that the objectives are supported by the AONB Units. For Strategic Objective B is welcomed, particularly in terms of the emphasis on major sites being adjacent to towns within the Severn Valley. This will enable waste operators to make better use of sustainable transport.

Natural England supported the Strategic Objectives, particularly the emphasis on enhancing as well as preserving the environment. However they expressed a reservation that the co-location of waste facilities may have the potential for biodiversity and landscape impacts.

The Highways Agency expressed support for the Strategic Objectives, particularly D and E. However they added that "We would urge that any development proposals which potentially would attract higher road trip rates are required to produce a transport assessment in accordance with DfT documents 'Guidance on Transport Assessment' (GTA) in order to fully consider their impact on the SRN and provide appropriate mitigation measures. The type of document produced either a Transport Statement or Transport Assessment and Travel Plan would be dependent upon the indicative thresholds contained within the GTA'.

The Forest of Dean District Council were generally in support of co-location but considered that the problems that can arise from safeguarded sites need to be carefully addressed.

Smiths (Gloucester) Ltd considered that Objectives A and B were 'highly desirable', but they questioned how they were deliverable through the planning system. In terms of B they considered that the policy needs to be responsive to market fluctuations and variations.

Stoke Orchard Parish Council considered that Section C should be amended, adding impacts on air quality to the list of undesirable environmental effects.

Cheltenham Borough Council generally supported the Strategic Objectives but wanted to see how they related to those in the Sustainability Appraisal.

Stroud District Council expressed conditional support for the Strategic Objectives but only provided that no one objective had a greater weighting than the others. Linkages to the Waste Hierarchy needed to be made more specific. Objective D should recognise that the sustainable transportation of waste in fine in theory but needs a practical means of support. Objectives need to set out a means of measuring to be SMART.

Sunhill Action Group considered that co-location should be treated very carefully as it could be misinterpreted by Planning Officers and Councillors.

The Environment Agency welcomed the Strategic Objectives, which they considered had been successfully streamlined with jargon removed, in response to the advice in workshops. They welcomed the inclusion of re-using waste as a resource, as requested at Issues and Options stage. In terms of Objective E they stated that: 'There may be circumstances where it is not preferable to continue using a current waste site as it may be giving rise to unacceptable environmental or social problems. In such occasions it would be appropriate to source a new location for waste facilities. Therefore we welcome the inclusion of the words 'where appropriate' in this objective as this acknowledges that there should not be a blanket decision on continuing the use of all sites.'

West Gloucestershire Green Party stated that it is accepted that the objectives will be supported, but 'the devil is in the detail'. They considered that the public were not allowed enough time and did not have enough information to consider the detail. They considered that the consultation exercise needed to be extended.

□ Comments on the Strategic Objectives via the short questionnaire

WCS Options	Total representations on this option	Supported the option	Partial support for the option	Did not support the option	Those considering it to be their Preferred Option
WPO2 A	87	68	17	2	Na
WPO2 B	86	75	9	2	Na
WPO2 C	87	85	2	0	Na
WPO2 D	87	72	15	0	Na
WPO2 E	86	75	10	1	Na

Non - Household Waste

Several consultees made comments relating to the volumes and types of waste produced by businesses, manufacturers and retailers and making legislative decisions to control these.

Recycling Issues

There were several issues raised in relation to the types of waste which can or cannot be recycled within the county or within individual districts.

Charging for Waste Collection

There were several comments reflecting opposition to charging for individual waste collections and concerns that this would lead to fly-tipping.

Community Involvement / Responsibility

There were several comments agreeing that there should be regular community involvement/education with regards to waste issues. There were also comments in regards to not understanding the term 'Communal Responsibility' or how it could work.

Technologies and Sites

There were several comments positively encouraging more recycling, home composting and reducing waste. There were mixed comments in relation to incineration and landfill with some people pro-landfill and anti-incineration and some people anti-landfill and pro-incineration. Some comments were in relation to specific sites and some consultees made favourable comments towards increasing local facilities. One consultee was not supportive of safeguarding sites from other future development. (These comments were echoed in both question 1 and question 2).

Sustainable Transport / Importing Waste

There were concerns raised about waste from outside the county being imported to sites within the county and also that waste should be disposed of at the nearest appropriate facility. Comments were also made regarding using sustainable transport methods.

■ WPA response

The various stakeholder comments on the Vision and Strategic Objectives are welcomed and the detail within the representations will be fully considered and appropriate changes made in the next Preferred Options stage of consultation on the WCS. The details of how the Vision presented in the WCS came about is contained in Technical Evidence Paper WCS-B, suffice to say that substantial work has been carried out by both the WPA and the WDA functions of the County Council in producing an appropriate vision. In this respect Gloucester City Council's comments on the lack of alternatives are not justified. The statistics show that only 3 out of the 30 respondents on the Vision did not support it. 27 respondents either fully or partially supported it. In terms of the targets within it, the representations do not add up to a consensus view e.g. Friends of the Forest, CPRE and the Member of Parliament for Gloucester stated that they were laudable but potentially too challenging. Others, such as SWARD considered that they were not challenging enough; stating that 'zero waste growth by 2020 is a defeatist approach'. Stroud District Council objected to the Vision on the basis that it prejudgets the choice of options in Section 6 and that it is not consistent with WPO7A that considers a wide area of search based on RSS Policy W2. The wording in the vision seeking to locate major facilities in the central area of Gloucestershire, proximate to the main urban areas along the M5 corridor was not intended to prejudge the broad locational options in Section 6; and is qualified by the statement in Para 97 of Technical Evidence Paper WCS - B Spatial Portrait and Vision. This states that 'This phrase however can only be incorporated into the vision if it accords with the outcome of the locational strategy consideration, as discussed in Technical Evidence Paper WCS-C Broad Locational Analysis'. The final vision may require some amendment to take account of this outcome.

In terms of the Strategic Objectives, there was generally broad support from stakeholders and this is welcomed. The particularly positive response from the EA is welcomed. Their comments reflecting the fact that the Issues and Options stage and stakeholder events have been useful and effective in terms of gauging views and refining options. The EA's view is in marked contrast to that of the West Gloucestershire Green Party who considered that not enough consultation had taken place and thus the exercise was flawed. The WPA do not accept this conclusion; stakeholders have had opportunities to make comments through both the formal stages and through more informal consultation. The vast majority of other stakeholders have not raised similar concerns. Indeed this stage itself is part of ongoing consultation whereby the WPA is seeking views and will consider all representations made. This approach is fully consistent with the principles contained in the Statement of Community Involvement (SCI) and the Development Plan Regulations. Notwithstanding this there will be further informal and formal stages of WCS preparation for the West Gloucestershire Green Party to provide their views and help shape the WCS. The County Council encourages the West Gloucestershire Green Party to engage in this process and are willing to meet them or any stakeholders early in the process to discuss any concerns as to the content of the WCS.

Strategic Objective B and the issue of encouraging markets prompted a variety of responses. A number of stakeholders questioned whether this was an issue that could legitimately fall within the remit of landuse planning and the scope of the WPA. Arguably the new more 'spatial' planning system does seek to embrace and influence such arenas, but the mechanisms and practical difficulties remain. SWARD's views on the Strategic Objectives are difficult to disagree with in theory, but questions remain as to what precise powers the WPA has to e.g. encourage residents to buy goods from recycled materials. Again, there is little doubt about the desirability or sustainability of such a scenario. The MP for Gloucester's comments are reflective of other stakeholder's views in relation to the need to reduce waste and packaging from businesses and the need for the Districts and the County to work together more effectively in collective recyclable materials. Legitimately Strategic Objective A could be strengthened to include businesses alongside 'Gloucestershire's residents'.

■ WPA response to the short questionnaire

Again, the comments on the Strategic Objectives via the short questionnaire are welcomed. A detailed synopsis of the short questionnaire appears at Appendix 3 of this report.

In summary the responses indicate considerable support. For WPO2C 85 of the 87 respondents offer support with 2 offering qualified or partial support. Many of comments point to the need for a more coordinated approach to recycling in the county and the desire to deal more effectively with waste from businesses (e.g. packaging from supermarkets). These are very common themes and unfortunately very difficult to address in a practical way. The former essentially results from the disadvantages of the two-tier system in Gloucestershire. If Gloucestershire was a single Unitary Authority it would combine the functions of the waste collection, disposal and planning with obvious advantages. The later is a matter that may perhaps only be properly addressed through central government legislation.

Broadly, the same comments apply as for the main consultation; the representations will be fully considered and appropriate changes made in the next Preferred Options stage of consultation on the WCS.

Section 4: Waste Reduction

■ Summary of section

This section focused on the reduction element of the waste hierarchy. It details how the WPA intends to work with other organisations and authorities in order to proactively reduce the amount of waste that is being produced in Gloucestershire. It raised the issue of site waste management plans which are due to become mandatory – accompanying planning applications. It also detailed the current adopted policy for waste minimisation in the Gloucestershire Waste Local Plan (Policy 36) – the Supplementary Planning Document (SPD) linked to this policy and emerging RSS Policy on this issue.

WPO3A:

Proposals for major development requiring planning permission must include a scheme for sustainable management of the waste generated by the development during construction and during subsequent occupation.

The scheme will include measures to:

- i. Minimise, re-use and recycle waste; and
- ii. Minimise the use of construction materials; and
- iii. Minimise the pollution potential of unavoidable waste; and
- iv. Dispose of waste that cannot satisfactorily be re-used/recycled in an environmentally acceptable manner.

The WPA will proactively pursue initiatives to reduce waste generation in Gloucestershire.

WPO3B:

All development requiring planning permission shall abide by the principles of waste minimisation.

This includes development that produces hazardous waste as a by-product of its processes.

Development exceeding the Government's 'major development' threshold will be required to submit a statement alongside the application setting out how waste arising during the demolition, construction and occupation (including operational processes) of the development is to be minimised and managed. The statement should also demonstrate how the developer has incorporated recycling* provision into the occupational life of the development.

WPO3C:

Planning applications for major development shall be accompanied by a statement setting out how waste generated during construction / demolition and subsequent occupation of the development is to be managed. The statement shall include:

- Evidence that the scheme's design has incorporated reasonable steps to eliminate waste and that sustainable construction techniques have been considered.
- A commitment to use materials comprised of recycled content.
- The tonnage of waste materials likely to arise set out by material type (e.g. wood, brick/concrete, soils, plastics etc).
- A method for auditing construction and demolition waste including how waste materials arising during demolition and construction will be segregated and re-used on-site wherever possible, or, where this is not possible, re-used off-site.
- Evidence that hazardous waste arisings have been minimised, and where unavoidable suitable provision been made for handling onsite.
- Demonstration that waste collection authority advice has been obtained on recycling box / residual bin requirements and that there is adequate access for waste collection vehicles and their operatives.
- Where appropriate developers will be expected to contribute towards managing the waste likely to be generated from their proposal.

■ Summary of comments for the above options

WCS Options	Total representations on this option	Supported the option	Partial support for the option	Did not support the option	Those considering it to be their Preferred Option
WPO3A	20	6	9	5	1
WPO3B	17	11	2	4	10
WPO3C	19	10	7	2	6

A variety of comments were made on these three options as detailed below:

Gloucester City Council supported the existing philosophy as contained in the current SPD on Waste Minimisation and therefore support WPO3C.

The Living Green Centre supported a policy approach encouraging more crushing and re-use of material from construction sites and particular support for small building firms and household DIY to separate wastes on site. They were of the view that we are missing opportunities for income generation in terms of a) allowing controlled advertising e.g. for local freecycle groups / businesses trying to cut waste etc b) allow sale to the public of items from

recycling centres c) have incentives and financial recognition for residents and businesses that do recycle. They further state that capital equipment installed at recycling centres needs to be carefully scrutinised so that it is flexible enough to adapt to changing circumstances. The same applies to vehicle fleets and waste collection bins etc.

The South West Regional Assembly were in favour of WPO3B as it provided long term flexibility. They also stated that WPO3C contained a useful additional policy measure that would usefully require developers to consider and plan for the life cycle waste management needs of any substantial development. They welcomed an approach that requires developers to provide for the ongoing waste management needs of any substantial development during their use phase. They also welcomed reference to draft RSS Policy W4.

Cory Environmental stated that a flexible approach to waste minimisation was welcomed. As such Options 1 or 2 were preferred. They suggested alternative wording for 1 as follows: '...minimise the use of primary construction materials.' In this way the re-use and reclamation of construction materials would be encouraged. They considered that WPO3C is insufficiently flexible but the points listed could form the basis of separate guidance notes.

Friends of the Forest stated that the modes adopted should be in the best socio-economic and well-being interests of all the County's residents, not least those close to waste management sites / facilities.

Elliot and Sons Ltd expressed the view that a further bullet point could be added stating that where waste cannot be reused on site then there should be an indication of what recycling facilities the material is likely to go to.

Wiltshire County Council considered that all 3 policy options were laudable but WPO3B was considered to be the best approach.

Cllr Venk Shenoi – Forest of Dean District Councillor was of the view that WPO3C was too rigid and could restrict cost-effective innovation.

CPRE (Gloucestershire Branch) considered that WPO3B is stronger in its intent than WPO3A. They expressed concern that the majority of development may fall outside the 'major development' threshold.

Government Office for the South West (GOSW) supported the principles and measures in this section to minimise waste from major development.

Mr D Luckett indicated support for WPO3B.

Natural England had no comments on these options.

Forest of Dean District Council considered that WPO3B was the best option. They stated that WPO3C was potentially too rigid.

Smiths (Gloucester) Ltd were of the view that, for waste that was not re-used on site, routes for recycling and re-use offsite should be outlined.

Cheltenham Borough Council supported WPO3C as it provided greater certainty to developers. They raised the issue of the potential redundancy of this policy as national guidance on these issues comes into force. However, national or regional policy would only cause this policy to be redundant if it were more stringent. They stated that it would be beneficial if the policy also required developers to provide refuse storage facilities within their developments and the equipment required for sorting and recycling waste.

Stroud District Council considered that WPO3B most reflects the Waste Minimisation SPD's aspirations, but there is a concern about the time and resource implications (for Development Control) of such an approach for all development. And will it be effective for all developers?

Thus Option WPO3C is conditionally supported provided that the supporting text sets out the close links with the SPD.

Safety in Waste and Rubbish Disposal (SWARD) wanted clarification on the phrase (Para 57) ‘...to proactively reduce the amount of waste arising in Gloucestershire’. They stated that in their view a clear distinction should be made between ‘waste’ that is unwanted by the individual but which may still have a viable use and waste which has no further value and must be permanently disposed of. They were of the view that site waste plans must be made mandatory and that the principles of waste minimisation should be extended beyond construction and development. In terms of WPO3 the policy should list the principles of waste minimisation and any additional costs incurred by developers must not override those principles.

The Environment Agency considered that all three options were appropriate for minimising waste and if possible a hybrid option should be developed out of all three. Flexibility is important and thus C is probably too rigid. They considered a reference to hazardous waste was appropriate.

West Gloucestershire Green Party considered that there had not been enough time for this consultation.

■ WPA response

As it currently stands the adopted (saved) policy for encouraging the minimisation of waste is set out in Policy 36 of the Waste Local Plan (WLP), and expanded in the supplementary planning document (SPD) ‘Minimising Waste in Development Projects’ (adopted Sept 2006). However, the representations made in respect of the three options for developing a new policy to minimise waste indicated that using the approach currently adopted in the saved WLP was not favoured. ‘Flexibility’ and avoiding being ‘over prescriptive’ were important facets that some stakeholders (Cory Environmental, CPRE, Cllr Shenoi, Forest of Dean DC and the Environment Agency) particularly highlighted. These factors are also considered to be important by the WPA as new initiatives are continually being put forward as good practice by the Government that need to be appropriately incorporated within the approach without having recourse to amend the development plan. This is compounded by each project and will have its own peculiarities that need addressing. To this end Option C was considered by some (Forest of Dean DC, Cory Environmental and Cllr Shenoi) to be too prescriptive, although it was favoured by Cheltenham BC and Stroud DC due to its certainty for developers.

One such new issue arising from Defra is the necessity for developers to prepare a Site Waste Management Plan (SWMP) for large scale development. SWMPs apply to all forms of construction project above £300,000 with more detailed reporting on projects over £500,000. (See discussion below). In summary, the purpose of the SWMP is to maximise materials resource efficiency. This should result in savings to the developer provided they prioritise waste minimisation throughout the construction project. In the SWMP developers are required to record for each waste type, how much will be reused, recycled or taken away for recovery or disposal elsewhere.

The WPA considers that whilst the mandatory submission of SWMPs is to be welcomed it does not, in reality, change the position set out in the SPD. This is because the SPD’s requirements were, and still are, more stringent than those in the SWMP Regulations 2008. The WPA does not consider it to be appropriate to relax its approach to this important issue to align more closely with these regulations. Additionally, the SWMP only deals with materials arising during the construction and demolition phases. It does not adequately address the design stage (although this is mentioned in the guidance) and no consideration is made in respect of managing the waste that will be generated once the building is being occupied. This latter point is considered important to aid WCAs in meeting their recycling targets and was raised by SWARD and Cheltenham BC.

The adopted SPD addresses many of the points raised by respondents: it uses case study examples of good practice to aid DIYers and site foremen; it includes a supporting leaflet for

householders to generate greater publicity and awareness of waste minimisation initiatives; it explicitly refers to the principles of waste minimisation; it reflects implementation concerns from planning officers/departments by setting out an easy to use 10-point checklist; it requires developers to provide refuse storage areas within their scheme and equipment for sorting/recycling waste; where waste is taken off site it encourages this to be to facilities where it can be recycled; and fundamentally it requires all development to abide by the principles of waste minimisation.

Site Waste Management Plans

From April 2008 the Government has made the preparation of a SWMP compulsory for construction projects in excess of £300k. The aim of the SWMP is to address two key issues: improving materials resource efficiency; and reducing fly tipping. It will achieve the former by promoting more economic use of construction materials and methods, including re-using or recycling materials that would otherwise be discarded. The Government believes it will help to reduce fly tipping by restricting opportunities for illegal dumping by providing a clear audit trail of waste materials removed from the construction site (this however assumes that the materials have been recorded as waste in the first instance!).

Context

The Government's *Waste Strategy for England 2007* identifies good potential to increase resource efficiency in construction and reduce waste. The construction industry is a major source of waste in England, using the highest tonnage of solid material resources in any sector (over 400 million tonnes). The construction, demolition & excavation (CD&E) sector generates more waste in England than any other sector, and is the largest generator of hazardous waste (around 1.7 million tonnes). By comparison, the sector accounts for 9 –10% of GDP. Objectives of the waste strategy for the construction sector include:

- providing the drivers for the sector to improve its economic efficiency by creating less waste from design to demolition.
- treating waste as a resource, re-using and recycling more and asking contractors for greater use of recovered material.
- improving the economics of the re-use and recycling sector by increasing demand and securing investment in the treatment of waste.

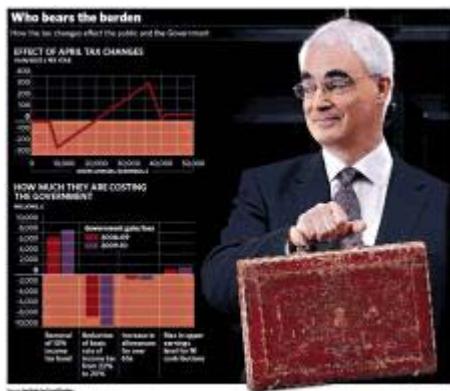
Source:

<http://www.defra.gov.uk/environment/waste/topics/construction/index.htm> (accessed 22/4/08)

Landfill tax per tonne >>		
	Landfill tax per tonne	Actual Cost to Business (per tonne)*
2005 =	£18	£91
2006 =	£21	£95
2007 =	£24	£100
2008 =	£32	£112
2009 =	£40	£124
2010 =	£48	£136
By 2012 total landfill costs could be well over £100 / tonne		

Source:

<http://www.miltek-uk.co.uk/Landfill-costs-2441.aspx?gclid=CPrFxsKy7pICFQtnQgodF0za3Q>



Legal Duty

The legal duty to prepare a SWMP is set out in the Site Waste Management Plan Regulations 2008 (SI 2008no.314) http://www.opsi.gov.uk/si/si2008/ksi_20080314_en_1. These came into effect on 6th April 2008. It is the duty of the client to prepare the SWMP prior to construction commencing, but the duty of the contractor to update it as work progresses, including engaging with sub-contractors in respect of the SWMP requirements.

There already exists a 'duty of care' (under the Environmental Protection Act 1990, Section 34), which is placed upon anyone who is 'in control' of waste – this means: checking that the person to whom waste is given is authorised to receive it; completing, exchanging and keeping waste transfer notes when the waste is handed over; and taking all reasonable steps to prevent unauthorised handling or disposal by others.

Threshold

The SWMP threshold is cost based. Projects estimated to cost more than £300k before work begins are required to prepare and implement a SWMP. Gloucestershire's SPD sets a threshold of 'major planning applications' for submitting a waste minimisation statement – although crucially it requires all development to abide by the principles of waste minimisation (as set out in the SPD). The definition of a 'major planning application' for residential developments are: 10 or more dwellings; or (if this is not known) the site area is 0.5 hectares or more. For other types of development it is where the floorspace to be built is 1,000 square metres or more; or the site area is 1 hectare or more.

The issue with how the SWMP threshold should be taken forward in the WCS in light of the SPD thresholds clearly needs to be addressed. However, the WPA considers that it is not appropriate to do this in a WCS policy as such an approach would be too inflexible given the potential for further change (as per respondent's comments above). Additionally, the SPD's threshold is considerably tighter than that of the SWMP and therefore, in the interests of driving waste management up the waste hierarchy, the WPA considers that the more stringent thresholds which are currently being applied should prevail.

Content of a SWMP

A SWMP will need to forecast how much of each type of waste (as a minimum this should be inert, non-hazardous and hazardous) will be produced on site and how it will be managed (for example source segregation). Any decisions taken on the design, construction method and materials that will reduce the amount of waste should be recorded in the plan. Options need to be explored for the waste that cannot be avoided (residual waste). This should include the potential for reusing or recycling on-site before considering any off-site possibilities for re-use, recycling, and other types of recovery or disposal.

Some options to consider in order to minimise waste

- **Refurbishment vs new build** – expectation is that the former creates less waste, although commercial reasons or planning controls might dictate the choice
- **Ordering and delivery of materials** – consider how materials are procured and delivered to site. Just in time deliveries can reduce the amount of waste produced as materials spend less time on site.
- **Standard material sizes** – adapt the design to standard material supply sizes or specify bespoke sizes to avoid waste off-cuts
- **Construction methods** – prefabrication means less waste on-site and a greater likelihood of the supplier reusing any waste at the site of manufacture

When to Submit

A key issue is the potential for changes in design to occur to accommodate sustainable waste usage after planning permission has been granted. This could, in some instances, lead to a revised planning permission being required, which is likely to be too time consuming and costly to make it worthwhile. Consequently, to add genuine value the SWMP needs to be considered from the project's conception, not as a bolt-on once the scheme is about to be built. As a result, requiring a SWMP to be submitted as a condition of the planning permission is considered to be too late in the process. This information should be submitted as part of the application's supporting information and thus included in a local authority's planning application validation checklist.

Waste Arising During Occupation

This however is only part of the 'waste' story. Once a building is occupied (i.e. the construction phase has been completed) it will continue to generate waste, albeit of a different kind. The provision of dedicated storage and collection areas for recyclate and residual waste materials will encourage people to segregate their waste and thus divert more from the residual waste stream. The SW RWMS (pg.45) states that "*many people will recycle more if the infrastructure is in place to make it easy for them to do so*". In Gloucestershire the adopted SPD on 'Minimising Waste in Development Projects' explicitly relates to this aspect.

However, below is a response to a BBC on-line discussion on recycling:

"I couldn't care less about recycling. If the council (who have the statutory obligation to recycle) wants to do so then they should feel free to do it. I pay them enough in council tax so why can't they employ people to sort the recyclables out at the transfer stations? If they want me to do their job for them I'll happily do so and send them an invoice. Until then, it all goes in the same bin". Kevin Bennett, Newton Abbot, UK Tuesday, 28 June, 2005 (http://news.bbc.co.uk/1/hi/talking_point/4618699.stm accessed 22/4/08)

When faced with such intransigent positions as this it is difficult to know how to positively influence such behaviour.

Regulation and Enforcement

Effective implementation is key to the SWMP process. The government advises regulators that SWMPs should be checked, where possible, during existing site visits. These will be a light touch, ensuring that a SWMP is in place and implemented, unless more significant compliance issues or fly-tipping is suspected. SWMPs reinforce a chain of responsibility for all waste actions from the sub-contractor to the principal contractor or corporate body.

SWMPs are a mandatory element of the DCLG standard for Sustainable Homes. A rating against this code is now required for all new homes. Consequently this should be sufficient to ensure that SWMPs are prepared and implemented. However, if this fails, and illegal waste disposal is suspected, enforcement powers are given to WDAs, WCAs, WPAs and the EA. The government also anticipates that environmental health and trading standards departments will get involved due to their experience in checking waste documentation and undertaking investigative work. This



however is more in relation to fly tipping and unlawful disposal of waste and action should be proportional to the breach.

There are serious financial penalties for SWMP offences (see table below), which could result in a summary conviction (Magistrates court) – penalty up to £50,000 – or a conviction on indictment (Crown Court) – unlimited fine. Failure to produce a SWMP, or any other recording incident, could result in an ‘on the spot fine’ (fixed penalty notice) of £300, which is the same as for any other waste documentation offence. Government guidance advises that repeat offenders should be taken in front of the Courts.

Offence	Guilty party/parties	Penalty
Starting a project (on site) without a SWMP	Client and principal contractor	A person guilty of any offence is liable: (a) on summary conviction, to a fine not exceeding £50,000 or (b) on conviction on indictment, to an unlimited fine.
Failing to update a SWMP when waste is removed from the site	Principal contractor (or client, if no principal contractor)	
Failing to make a SWMP available on site	Principal contractor (or client, if no principal contractor)	
Failing to keep a SWMP for two years from completion	Principal contractor (or client, if no principal contractor)	Where a body corporate is guilty of an offence, proved to be committed by a qualified person, director, manager, secretary or someone acting in such capacity he is guilty of an offence as well as the body corporate.
Failing to comply with additional duties	Client and/or principal contractor as specified in the Regulations	
Making a false or misleading statement in a SWMP	Client, person drafting the plan or principal contractor	
Failing to co-operate with, or intentionally obstructing anybody acting in the execution of these regulations.	Anyone failing assist implementation of the plan or failing to respond to a request or visit by an enforcing officer	

In terms of assessing the appropriateness of the SWMP content this is unclear from the guidance. The use of an SPD is advocated in the guidance but this would need to relate to adopted development plan policy. It may be a more appropriate function for officers in the building control section of local authorities to assess the content of a SWMP.

Non statutory guidance on SWMPs is available at:

<http://www.defra.gov.uk/environment/waste/topics/construction/pdf/swmp-guidance.pdf>

Section 5: Reuse, Recycling, Composting and Recovery Strategy

■ Summary of section

Section Five addressed options for encouraging the re-use and recycling of waste materials, developing markets for recycled products and for recovering 'value' or 'energy' from materials. It pointed to the links between two particularly important strategies: The National Waste Strategy 2007 and Gloucestershire's Joint Municipal Waste Management Strategy (including the Residual Procurement Plan – aiming to meet LATS⁵ targets. In total, 10 options were presented in this section.

Recycling and Composting Options

WPO4A:

Proposals for recycling and composting facilities will be approved subject to meeting the following criteria:

- i. The impact on neighbouring land uses is acceptable (proposals for composting must be at least 250m from sensitive landuses unless it can be satisfactorily demonstrated it can operate in closer proximity).
- ii. The highway access is suitable for the proposed vehicle movements.
- iii. They contribute towards providing a sustainable waste management system for Gloucestershire.

WPO4B:

Sites for composting and recycling in Gloucestershire will be identified in a site allocations development plan document. Physical and environmental constraints, including the impact on neighbouring land uses, will be a key consideration. The following search criteria will be used as the basis for selecting sites with priority being given to:

- i. Previously-developed land and redundant rural buildings, including farm diversification opportunities.
- ii. Co-location with complementary or similar existing operations.
- iii. Sites within* or on the edge of towns.
- iv. Sites in the central Severn Vale that can serve a wide market area.

*In the case of composting it may prove difficult to locate within urban areas due to a 250m buffer generally required for issues relating to bioaerosols. However this would not necessarily apply for recycling/transfer facilities.

WPO4C:

Strategic Site Policy

Sites for strategic composting and recycling facilities in Gloucestershire will be identified in a site allocations development plan document. Physical and environmental constraints, including the impact on neighbouring land uses, will be a key consideration. The following search criteria will be used as the basis for selecting sites with priority being given to:

- i. Previously-developed land and redundant rural buildings, including farm diversification opportunities.
- ii. Co-location with complementary or similar existing operations.
- iii. Sites within* or on the edge of towns.
- iv. Sites in the central Severn Vale that can serve a wide market area.

*In the case of composting it may prove difficult to locate within urban areas due to a 250m buffer generally required for issues relating to bioaerosols. However this would not necessarily apply for recycling/transfer facilities.

Local Site Policy

Proposals for local recycling and composting facilities will be approved subject to meeting the following criteria:

- i. The impact on neighbouring land uses is acceptable (proposals for composting must be at least 250m from sensitive land-uses).
- ii. The highway access is suitable for the proposed vehicle movements.
- iii. They contribute towards providing a sustainable waste management system for Gloucestershire.

WPO4D:

Areas of search for locating composting and recycling facilities in Gloucestershire will be identified in a site allocations development plan document. Strategic physical and environmental constraints will be a key consideration. The following search criteria will be used as the basis for selecting areas with priority being given to:

- i. Areas with large waste arisings.
- ii. Areas on the edge of towns.
- iii. Areas in the central Severn vale that can serve a wide market area.

⁵ The Landfill Allowance Trading Scheme (LATS) sets targets for the maximum amount of biodegradable municipal waste that is allowed to be landfilled each year.

□ Summary of comments for the above options

WCS Options	Total representations on this option	Supported the option	Partial support for the option	Did not support the option	Those considering it to be their Preferred Option
WPO4A	22	6	9	7	4
WPO4B	19	4	8	7	2
WPO4C	19	4	11	4	11
WPO4D	19	5	9	5	2

A variety of comments were made on these four options as detailed below:

Cold Aston Parish Council stated that households should be encouraged to recycle as much waste as is possible. They ask that the recycling facility at Fosse Cross is maintained as it is well run and easy to use. They expressed the view that there should be more re-use of items currently being dumped. Items of use could be offered to the public for sale with money going to cut costs and / or support charities and local projects.

Gloucester City Council expressed concern as to the potential role of anaerobic digestion and why it had not been considered in this section. Given its carbon benefits they suggested that support be given to it as a technology. Option WPO4C was supported. In terms of the recovery options they expressed support for WPO6C although they stated that some of the criteria were too onerous. Whatever option is chosen the proximity to a heat market and to a facility taking any (potentially hazardous) residue should be components of the search criteria.

Government Office for the South West (GOSW) expressed the view that 'Generally the options discussed in this section will set a framework for criteria based policies to judge development proposals or a set of 'search criteria' for the identification of sites in later LDDs. However it is not clear how this search criteria will be applied through the preparation of later LDDs and exactly how this process fits within the locational strategy contained in the following section'. They further state: 'The strategy should provide a far clearer and more positive approach to help deliver new waste facilities, by identifying sites if necessary and the broad location and pattern of new provision.' In terms of the recycling targets the strategy will need to say what, where, when and how facilities will need to be provided to meet these targets. The preferred options document should 'be the means to set out more definite ideas for solutions and approaches...using sustainability appraisal as one of the tools to reach a decision'.

Allstone Sand and Gravel considered that site identification has not worked through the existing Waste Local Plan – as sites have not come forward. The large sites have been developed for other uses and safeguarding has failed to protect them.

Cory Environmental Ltd expressed the view that the 250m buffer zones in the composting policies should not be regarded as an exclusion zone. The preferred policy option should be modified to give a more accurate explanation of the 250m assessment zone.

Friends of the Forest expressed concern that WPO4A was too ambiguous. They were not supportive of WPO4D unless it included criteria based on the best environmental option and socio-economic factors.

Elliot and Sons Ltd considered that there is a need to be maximum flexibility in allowing sites to be brought forward. Site identification in the existing Waste Local Plan was broadly unsuccessful for a number of quite complex reasons. The plan should allow for sites to come forward – these should be safeguarded and would encourage maximum recycling. Elliott's own site at Shurdington, with its long history of waste recycling should be one of these.

Wiltshire County Council offered support for WPO4B.

Cllr Venk Shenoi – Forest of Dean District Councillor stated that windrow composting, IVC, AD and dry recycling processes all need to be considered differently when considering sites / locations.

Friends of the Earth (Forest of Dean) stated that strategic facilities should be deleted from the policy as they will not be required as was would be dealt with at the community level by small facilities of 20,000 to 40,000 tpa.

CPRE (Gloucestershire Branch) did not support WPO4A, stating that more certainty is needed. WPO4B would be acceptable. WPO4C represents a sensible approach; however the definition of 'Strategic' at 50,000 tpa means that a local facility can still be quite large. They suggest that '...local is limited in capacity to that required to meet need within a given distance (say 5 miles) and new capacity will not be approved until all existing capacity in the local area has been used up. WPO4D is the least satisfactory option.

Grundon Waste Ltd considered that none of the options were satisfactory. They considered that the Core Strategy should identify broad locations and a broad strategy and not leave it all to the sites DPD. Locations should be identified in accordance with WPO7. The policy should also be broadened to include treatment facilities ancillary to recycling.

Hills Minerals & Waste considered that there was a need for recycling facilities to operate in conjunction with inert waste sites within Gloucester (subject to addressing the shortage of inert waste sites in the first place). Part (i) of WPO4B and C should emphasise opportunities for waste management development which are afforded by quarrying. WPO4D is only partially supported because whilst a site in the Severn Vale might be suitable, the market area which it seeks to serve might be too wide. Sufficient facilities need to be made available throughout the County and the proximity principle continued as an important objective.

Clearwell Quarries offered similar comments to Hills Minerals & Waste.

Land and Mineral Management offered similar comments to Hills Minerals & Waste and Elliotts in terms of site identification and safeguarding in the existing Waste Local Plan being broadly unsuccessful for a number of complex reasons.

Mr D. J Luckett considered that a two tier option would provide a greater degree of flexibility to meet recycling criteria. He expressed the view that local recycling was the key to meeting targets.

Natural England expressed some concerns about 1. the re-use of previously developed land and the potential for such sites to have significant biodiversity or geological interest. 2. There is a reference under WPO4D to strategic environmental constraints, but it is unclear what these are – if they are just the nationally designated wildlife sites then the council would not be meeting its duties to consider biodiversity under PPS9 and the NERC Act. 3. The Habitats Regulation Assessment notes that the effect of options that the effect of options WPO4B, C and D on the Severn Estuary cSAC/SPA & Walmore Common SPA are uncertain. Natural England agree with this assessment, and state that these options are only acceptable if it can be demonstrated that there would be no residual adverse effect on the integrity of the two European sites.

Forest of Dean District Council considered that WPO4C is the most flexible option, most able to cope with the different needs of different wastes.

Smiths (Gloucester) Ltd considered that there needed to be maximum flexibility in allowing sites to be brought forward. Smiths, like a number of other C&D/C&I operators do not consider that the sites in the previous Waste Local Plan were successful. Great difficulties were had e.g. in terms of ownership issues preventing sites coming forward for waste management. Smiths also point to problems with safeguarding with completion from industrial uses which generate higher values. They further stated: '...until the sites have been identified, which is not possible at this stage, it is difficult for Smiths to be confident that the sites will be sufficient/appropriate. Notwithstanding these comments, and Smith's views on a criteria

based approach being more flexible, if there is any identification of sites, Smiths consider that their existing depot at Moreton Valence already represents a strategic facility recycling waste which should be identified and safeguarded as such with the potential for further waste management development’.

Cheltenham Borough Council stated that WPO4C is the most strongly supported and it would be beneficial for strategic sites to be allocated, as this provides certainty for local residents. Local sites should be accommodated close to arisings and should be dealt with on a case by case basis. Clarification is required as to whether the policy includes community composting schemes or whether this would be dealt with by the criteria for local facilities.

Stroud District Council conditionally supported Option WPO4C – if indicative size or use thresholds are set out for each policy. ‘However there needs also to be a safeguard that WPO4C is clearly linked to WPO1 to ensure safeguards such as environment and employment exist and treating waste at source is preferred. This policy gives flexibility to Districts to deal with waste at source and within each District’.

Sunhill Action Group expressed the view that the sensitivities of each site must be looked at.

The Environment Agency supported the policies for considering sites in site allocations DPD as this provides more certainty and the ability to consider planning and environmental issues holistically. There is no preference for a particular policy although WPO4C seems to be a good flexible approach.

West Gloucestershire Green Party considered that an area of search approach is the most sensible. But each case should be taken on its own merits. They stated that ‘Your use of composting as a preferred technology is flawed, as anaerobic digestion offers a better environmental outcome, and is more proven across Europe. It is also more expensive.’

■ **WPA response**

In terms of the Recycling and Composting options, WPO4C and WPO4D broadly seem to have been favoured by the majority of respondents, although the WPA are aware that it is a mixed picture. Comments from the waste industry stressed the need for maximum flexibility in the way in which sites/facilities could be delivered. They considered that the Adopted Waste Local Plan sites and strategy for sites had generally not been successful, in particular in making provision for the construction & demolition/inert waste streams. The WPA to some extent accepts that there have been difficulties in bringing some of the WLP allocations forward due to unwilling landowners. However at the same time some of this provision has been taken forward on preferred sites in the WLP. Possibly some of this has to do with respective land values in Gloucestershire and the difficulty of the industry in competing with more lucrative development schemes. These matters are potentially outside of the control of the WPA. However deliverability has now been brought forward to centre-stage in Government policy, through PPS 10 and the amended PPS 12, therefore and review of sites contained in the Waste Core Strategy or any other DPDs will need to demonstrate that land can be potentially made available for waste management facilities. GOSW expressed the view that strategic sites could or should be identified in the WCS, but it seems that (both from their written comments and from recent discussions) that their priority for sites in the WCS relates more to residual MSW than for sites for other waste management uses such as recycling and composting. In relation to Gloucester City Council’s comments as to the potential role of anaerobic digestion (AD) – this could be supported within recycling and composting options, but due to the recovery of methane from the process, it potentially fits better within the ‘Recovery’ section. However, in saying this, the WCS are not technology specific in terms of policy content (as advised by Government). At this stage, the WPA is carefully considering which combination of options to take forward in the next stages of the Waste Core Strategy (WCS). It is clear that a change of direction will require site allocations to be contained within the WCS for strategic residual MSW diversion. The WPA will also consider the potential context for site allocations/location strategy for all waste streams as appropriate.

Markets for Recyclates Options

WPO5A:

The waste planning authority will encourage development of a 'resource economy'. Proposals for the development of markets for recycled materials, in particular, initiatives to assist small to medium sized businesses to re-use/recycle their discarded materials will be supported by the WPA.

WPO5B:

In encouraging the development of a 'resource economy' the waste planning authority will work in partnership with other organisations (for example Gloucestershire First, the Gloucestershire Waste Partnership, the Waste Disposal Authority, the Gloucestershire Environment Partnership) to promote the development of markets for recycled and recovered materials and products.

■ Summary of comments for the above options

WCS Options	Total representations on this option	Supported the option	Partial support for the option	Did not support the option	Those considering it to be their Preferred Option
WPO5A	15	7	7	1	6
WPO5B	17	9	7	1	11

A variety of comments were made on these two options as detailed below:

Stroud District Council expressed support for WPO5A as this provided a more positive policy steer.

Grundon Waste Management stated that WPO5B was their preferred option as it reflects the Regional Waste management Strategy which refers to the establishment and development of businesses that process Recyclates and re-use waste.

Friends of the Forest considered that the markets for Recyclates will inevitably involve other organisations and expertise. It is also important that the County obtains best value with respect to waste recycling.

Elliott & Sons Ltd considered that the options are laudable but they are unsure how the planning system will be able to deliver them. They stated that: '...if for WPO5A it will result in positive consideration for developments for waste facilities at non mainstream waste industries / business then that would be helpful.'

Wiltshire County Council considered that the intention of WPO5A and B were worthy or support, however questions remain as to how Gloucestershire will create these markets.

Cllr Venk Shenoi – Forest of Dean District Councillor stated that success will depend upon minimising costs and maximising returns from material sales.

CPRE (Gloucestershire Branch) stated that WPO5B was the more realistic option.

Land and Mineral Management Ltd considered that the options are laudable but they are unsure how the planning system will be able to deliver them. They stated that: '...if for WPO5A it will result in positive consideration for developments for waste facilities at non mainstream waste industries / business then that would be helpful.'

Mr D. J Luckett expressed the view that 'the wider the net, the more chance of success'.

Forest of Dean District Council considered that WPO5B was the best option to encourage the waste economy.

Smiths (Gloucester) Ltd considered that the options are laudable but they are unsure how the planning system will be able to deliver them. They stated that: '...if for WPO5A it will result in positive consideration for developments for waste facilities at non mainstream waste industries / business then that would be helpful.'

Cheltenham Borough Council supported both policy options but had a preference for WPO5B as it reflects the importance of partnership working.

Safety in Waste and Rubbish Disposal (SWARD) considered that neither WPO5A or WPO5B seemed to meet RSS Policy P.4.1 which promotes the creation of recycling businesses. They believed that the policies in the WCS should be more explicit in this regard. They raise the idea of the establishment of a paper mill in the south of the County to a) gain income and employment from recycling and b) to reduce climate change emissions caused by transporting waste overseas.

The Environment Agency supported both policies, but has a preference for WPO5B as this is the more pro-active approach.

West Gloucestershire Green Party stated that to create a resource economy you must first create markets. The public sector is the largest consumer, thus the County Council should ensure in its strategies that the use of recycled materials are maximised – leading by example.

■ **WPA response**

Generally WPO5B received more support from respondents. The Environment Agency's response was fairly typical with general broad support for both options but a preference for WPO5B as 'the more proactive approach'. Industry expressed some concern about the delivery of these options through the planning system, and the WPA recognises this as an issue. In response to the West Gloucestershire Green Party's comments on these options, the County Council does act to put its own house in order (including formally through OHIO initiatives). Some examples include:

- A recent County Council resolution (through the Gloucestershire Paste Partnership) calling for a ban on the use of plastic bags. See link below:
<http://www.goucestershire.gov.uk/index.cfm?articleid=18228&articleaction=print>
- The use of a 'Green' electricity supplier in Shire Hall offices. See details in link below:
<http://www.berr.gov.uk/files/file15120.pdf>
- The extensive use of recycled aggregate in construction/maintenance by Gloucestershire Highways.

Recovery Options

WPO6A:

Proposals for the development of residual waste facilities will be permitted in appropriate locations where it can be demonstrated that:

- the facility would be part of a sustainable waste management system; and
- in demonstrating sustainability the facility will not manage waste that could reasonably be recycled or composted; and
- it would realize energy recovery and disposal routes for residues would be satisfactory; and
- the facility would meet the relevant policies and criteria of the development plan.

WPO6B:

Proposals for the development of residual waste facilities will be permitted in appropriate locations where it can be demonstrated that:

- the facility would be part of a sustainable waste management system; and
- in demonstrating sustainability the facility will not manage waste that could reasonably be recycled or composted; and
- it would realize energy recovery and disposal routes for residues would be satisfactory; and
- the facility would meet the relevant policies and criteria of the development plan.

Proposals for the development of _____ (INSERT PREFERRED TECHNOLOGY AS STATED IN RESIDUAL PROCUREMENT PLAN) to manage municipal solid waste will be permitted in appropriate locations provided it accords with the above criteria.

WPO6C:

Strategic sites for waste treatment facilities will be allocated in a site specific development plan document. Such facilities will be located in accordance the broad locational approach identified in the Waste Core Strategy and accord with the following criteria:

- a) industrial estates and employment land (allocated or permitted for B2 uses);

- b) previously developed land;
- c) existing waste management facilities and mineral sites.

Planning applications for local residual waste treatment facilities will be determined using the three criteria set out above. Physical and environmental constraints, including the impact on neighbouring land uses, will be key considerations for both local and strategic sites.

WPO6D:

Strategic sites for accommodating waste treatment facilities should be situated within the broad locational area identified in the Waste Core Strategy. Within that area facilities are directed towards:

- a) industrial estates and employment land (allocated or permitted for B2 uses);
- b) previously developed land;
- c) existing waste management facilities and mineral sites.

Planning applications for local residual waste treatment facilities will be determined using the three criteria set out above. Physical and environmental constraints, including the impact on neighbouring land uses, will be key considerations for both local and strategic sites.

□ Summary of comments for the above options

WCS Options	Total representations on this option	Supported the option	Partial support for the option	Did not support the option	Those considering it to be their Preferred Option
WPO6A	19	8	3	8	3
WPO6B	18	4	3	11	3
WPO6C	16	5	5	6	7
WPO6D	15	2	12	1	4

A variety of comments were made on these four options as detailed below:

The Waste Disposal Authority stated that they supported WPO6D but also offered partial support for WPO6C.

CPRE (Gloucestershire Branch) stated that their preferred option would be a combination of the approaches in WPO6C and WPO6D.

Grundon (Waste) Ltd stated that WPO6C is preferred as it provides locational guidance and will be amplified in a sites DPD. They stated that this option should cross reference to WPO7. They also stated that there should be consistency with regards to terminology 'waste treatment facility' or 'residual waste facility'. The latter is more specific to the policy option and thus preferable.

Stroud District Council supported the certainty and flexibility provided by option WPO6D. Such an approach will allow any additional needs created in the future to be accommodated (and within the District close to sources of waste generation). This could cover the balancing act needed between front end collection schemes and the greater scale of regional needs and the operational benefits.

Allstone Sand & Gravel considered that (WPO6A) would allow maximum flexibility which is vitally important given changing market conditions and new advances in waste treatment / recycling.

Cory Environmental considered that it was entirely reasonable for the County Council to keep its options open in terms of the five methods for the treatment of residual waste outlined. However they considered that a strong lead, a statement of preference supported by reasoned justification would give greater public confidence in the Council's ability to deliver its strategy. They assumed that the policy alternatives related to larger capacity plants which because of their size and character would be more difficult to gain consent for. In these circumstances the allocation of sites in a waste local plan framework has notable benefits – giving some level of certainty to planning outcomes. Allocate sites can be protected from the pressures of alternative development and this is particularly important for strategic sites. In Cory's view a policy that provides for the allocation of strategic sites is preferred, but the difficulty of doing this is recognised and thus a criteria based approach may also have to be employed.

Friends of the Forest considered that facilities for the recovery of materials need to be based on the best technology. They favoured WPO6C but stated that WPO6D could also be made to meet identified requirements.

Elliott & Sons Ltd expressed the view that to allow for maximum flexibility and responsiveness to the market criteria based policies were appropriate. They could not see justification for the Municipal Waste Management Strategy residue as this should be covered by WPO6A.

Wiltshire County Council stated that Policy options 6A and 6B are very similar and appear to advocate a market driven, dispersal policy approach. Although this appears to fit with the Councils direction of travel in terms of MSW and the residual waste procurement plan, the options do not provide a clear locational steer for new development. By way of an alternative, Options 6C and 6D are more acceptable in so far as they do aim to steer new development.

Cllr Venk Shenoi – Forest of Dean District Councillor stated that it was difficult to differentiate between the choices but A and B will have similar impacts. AD needs adding to options and provision made for location.

Friends of the Earth (Forest of Dean) stated that they wished strategic facilities/sites to be deleted from the policy as a strategic site would not be required as waste should be dealt with at the local community level by small facilities of 20,000 to 40,000 tpa.

Friends of the Earth (Gloucestershire Network) submitted a lengthy representation – see the full text in Appendix 1 of this report. In relation to the WPO6A – WPO6D options they expressed the view that: ‘...the Waste Incineration Directive (European Commission 2000) says: Article 4 (2) (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): 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 addressed in the DPD. 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. Without CHP any application must be very much weaker than would otherwise be the case’.

FoE further stated that: high carbon costs are associated with thermal treatment compared with e.g. MBT with stabilised output to landfill for residual wastes in the county after the higher recycling rates proposed and that this conclusion is supported by a large body of literature which they cite – see Appendix 1. FoE stated that, in their view the net private cost of WTE (waste-to-energy) plants is so much higher than for landfilling that it is hard to understand the rational behind the current hierarchical approach towards final waste disposal methods in the EU (European Union). Landfilling with energy recovery is much cheaper, even though its energy efficiency is considerably lower than that of a WTE plant. This conclusion is similar to that reached by the OECD (Organisation for Economic Co-operation and Development) this year following their review of waste management in the UK and the Netherlands: ‘In both countries, there is currently a strong preference given to incineration compared to landfilling of waste as reflected e.g. in the landfill taxes they apply. A similar preference underlies the Landfill Directive of the European Union, which fixes upper limits for the amounts of biodegradable waste member states are allowed to landfill. However, estimates in both countries indicate that the environmental harm caused by a modern landfill and a modern incineration plant are of a similar magnitude, while the costs of building and operating an incinerator are much higher than the similar costs for a landfill. Hence, the total costs to society as a whole of a modern incinerator seem significantly higher than for landfilling - which indicates that some reconsideration of the current preference being given to incineration could be useful. Analyses of the negative environmental impacts of landfilling and incineration in both countries suggest, however, that the foundation for the present preference for incineration is questionable from the point of view of total social costs. It should be noted that the ‘social costs’ of waste management include the respective private costs i.e. the costs options together with the external environmental costs. In these circumstances it is suggested

that the DPD should be changed to ensure that any thermal treatment facility provided CHP and was required to demonstrate that the external costs were lower than the alternatives if sustainability criteria are to be satisfied.

Mr James Jones stated his opposition to the use of Sun Hill for the recycling of waste. He expressed the view that this site has blighted a broad area of countryside (much of it in an AONB) with bad smells from its existing use. It is not well located for transport networks and will involve an unacceptable use of minor roads with large lorries. There are much better and more suitable sites in the county.

Hills Minerals & Waste Ltd broadly supported WPO6D but stated that it would be more appropriate to be more specific in point (b) to cross reference with WPO4 and to include quarries and redundant agricultural buildings.

Clearwell Quarries Ltd made similar comments to Hills Minerals & Waste.

Land and Mineral Management Ltd made very similar comments to Hills Minerals and Waste broadly supporting WPO6D. They stated that '...it is essential that any policy allows maximum flexibility and responsiveness to moving technologies / changing. There is no justification for a specific qualification for the Municipal Waste Management Strategy residue as this should be covered by the general WPO6A'.

Mr D.J Luckett considered that these options were matters for professional experts.

Natural England had no comments to make on these preferred options.

Smiths (Gloucester) Ltd were keen to stress the need for maximum flexibility and responsiveness to technologies/markets etc. They could not see justification for a specific qualification for the Municipal Waste Management Strategy residue as this should be covered by the General WPO6A. 'If the Council does consider identifying/allocating sites Smiths consider that their existing depot at Moreton Valence already represents a strategic facility recycling waste which should be identified and safeguarded as such with the potential for further waste management development'.

Cheltenham Borough Council supported policy option WP06c stating that it would provide greater certainty for the public as to the location of future strategic sites. This policy retains the criteria based approach for local sites and this is also supported.

Safety in Waste and Rubbish Disposal (SWARD) considered that material which cannot 'sensibly be re-used or recycled' could 'very sensibly be re-used or recycled' at some future date. Heavy investment-in-material destruction techniques, such as incineration ('energy from waste') and gasification could be outmoded part way through, or even early in, a long term contract, causing serious financial impact on the taxpayer. Material destruction also requires replacement materials which will cause adverse environmental and climate changing results. Para. 87. Page 28 - all five options involve landfill. This should be made clear. Each of the last four options should conclude '...with final residues going to landfill'. 'The locational selection for 'strategic' sites will inevitably be influenced by the WLP identification of potential sites which in turn are where the waste companies have land. In terms of WPO6A and B – we do not understand the significance of the word 'reasonable'. The word 'reasonably' should be deleted. The sentence can stand without it. 'Reasonably' suggests there may be circumstances where it is unreasonable to recycle or compost. The public should be given some examples of such unreasonableness. Otherwise it suggests the Council lacks confidence, and therefore so do we, and we should prepare ourselves for the policy being ignored'.

The Environment Agency stated that they would prefer policy WPO6C as this allows for an allocations DPD. This affords the opportunity to scrutinise new site options and take a holistic view to various planning matters. The 3 criteria (a-c) identified in the policy are deemed appropriate, and the inclusion of the last paragraph of the policy allows for consideration of environmental constraints, such as flood risk.

West Gloucestershire Green Party stated that 'Strategic sites should be chosen carefully in order to obtain the BPEO. The obvious favouring of the Javelin Park option demonstrates that this has not occurred. It is evident that Gloucestershire wish to chose a traditional large mass burn option for residual waste, with electricity generation only. This is a poorly performing option from a carbon agenda point of view. Little or no thought appears to have been given to matching industrial consumers up with EfW plant at a smaller scale in order to maximise efficiency gains through the use of CHP or heat-only infrastructure. This is a lost opportunity if it is not pursued!'

Woodchester Parish Council were of the view that the earliest identification of suitable sites is essential, if local people are to have faith in the system. 'Back door' decisions by the Waste Authority will be counter-productive and result in opposition.

■ WPA response

WPO6 Recovery Strategy

Whilst there was no one preferred option emerging for the recovery strategy the least favoured option was WPO6B, which was the option that intended to state clearly which technology the WDA was going to use to manage MSW. Interestingly the WDA also did not support such a specific policy (Cheltenham BC however did support such an approach as they considered it would provide more certainty for the public).

The qualification in option WPO6B for implementing the municipal waste residual action plan (prepared by the WDA) is related to the theoretical certainty that managing municipal waste should present in terms of site location and technological solutions. This situation in Gloucestershire however is yet to be finalised, hence the 'blanks' in the policy. Notwithstanding this attempt to provide certainty the approach was not supported by the WDA so will not be carried through to the next stage of plan preparation.

Flexibility to adopt the most appropriate or 'best available' technology at a point in time was considered important by a number of stakeholders (Allstone Sand & Gravels, Friends of the Forest, Elliott & Sons, Land & Mineral Management, Forest of Dean DC, Smiths Ltd,). Making assumptions as to what might, or might not, be appropriate (as advocated by GOSW) in such a fast moving industry is not considered a realistic or prudent approach. Additionally, until the WDA have stated what their preferred technological solution will be for MSW it would be impossible for the WPA to state it. The WPA therefore considers that the recovery policy although needing to allow for flexibility in terms of waste management solutions, will also have a close relationship with the revised locational strategy that will include strategic locations for waste management.

Some objectors did not consider that any of the recovery technologies were proven and that consequently the pollution possibilities were too great. No alternative technological options were however put forward as to what could otherwise be done. Whichever technology is used to manage waste it will be subject to the EA's waste licensing regime which should ensure that the environmental impacts of facilities are kept to acceptable levels. Acceptability in this instance would be determined by the EA (for the waste license) and the WPA (for the planning application).

All waste technology options being considered by the WDA for managing MSW will require some residual waste which may need to be disposed of to landfill. Future drafts of the WCS will make this clear that some landfill provision might be required subject to the diversion through residual treatment.

The reference to 'reasonableness' in the policy derives from Waste Strategy 2007, which refers to 'sensibly'. The WPA considered using the latter term on the basis that given an unlimited amount of money, most waste could be recycled or composted. However, this does not represent a realistic or 'reasonable' option as the taxpayer has a limited budget, hence the use of the term in the policy.

On consideration of these differing opinions the WPA will follow an approach to planning for the recovery of value from waste in Gloucestershire that does not identify a preferred technology. It will instead be a matter for an applicant to demonstrate in accordance with criteria set out in a policy. The locational criteria for identifying sites will be based on those listed in options WPO6C & D.

The WDA is currently examining the potential for combined heat and power (CHP) in respect of the possible waste management options that they are considering. The proximity of facilities to the energy client(s) is an important consideration, but one that needs to be balanced against the concerns of the community to have waste facilities in close proximity to their homes/places of work. Meeting both of these concerns is a challenge but one that needs to be addressed at the early stages when planning large scale new development in order that CHP linkages can be installed. This is one of many considerations in terms of locating strategic waste development (other issues include AONB, flood plain, nature conservation etc.) and the WDA's final technical solution will be important in terms of selecting the most appropriate site.

Anaerobic digestion (AD) is a treatment process that has similar characteristics visually to in-vessel composting. However, it has been included within the 'recovery' section due to the recovery of methane from the process and its potential for generating heat. It is accepted that such a facility could be local or strategic in scale. However, the WCS does not seek to be technology specific in terms of policy content (as advised by government policy) and therefore generic subject policies (such as recycling, composting, recovery) were proposed. The thrust of the WCS is to divert waste from landfill via the waste hierarchy and therefore AD proposals by default would have this policy support. The WCS will confirm that AD is a form of treatment that can be considered within the recovery policy context.

Site Locations

Representations were made objecting to the use of Sunhill as a waste management site. The WCS however does not currently identify Sunhill, or any other site, as being a preferred site for new or extended waste management facilities.

Smiths consider that their existing operation at Moreton Valance represents a strategic waste management facility that should be safeguarded and could be used for further waste management development. The WPA will seek to safeguard the use of this site as a waste management facility from encroachment by incompatible land uses that may prejudice its operation as such. However the WPA acknowledges the importance of this site in the current waste management system for the County and will consider it very carefully in terms of its potential for future waste development.

General Representations

The terms "residual waste facility" and "waste treatment facility" have been used interchangeably in the WCS. The WPA accepts that these terms potentially have different connotations and will endeavour to be more specific in future drafts.

There was a typographical error in paragraph 93 of the WCS PO document. The reference to "WPO6E" should've been to "WPO6C".

Section 6: Locational Strategy

■ Summary of section

Section 6 was the most lengthy section of the Core Strategy, putting forward a number of policy options relating to the locational strategy for making provision for strategic facilities which manage waste. It addressed Strategic Objectives C,D & E and thus included policy options on:

- Broad locational search areas for strategic waste management facilities
- The environmental acceptability of existing hazardous waste facilities in Gloucestershire
- Waste Infrastructure – Sewage Treatment facilities
- Safeguarding
- Cumulative Impacts
- Landuse Designations
- Biodiversity / Nature Conservation.

Broad Locational Options

WPO7A:

A broad search area based on the full 16km Regional Policy W2 (using the search criteria outlined for Options WPO7b-d). Under this approach, strategic sites that are remote from arisings could be appropriate if they are able to demonstrate sustainable transport linkages.

WPO7B:

Use urban locations and the area labelled Zone C as the broad locational area in which strategic waste management facilities should be sited.

WPO7C:

Use urban locations and areas labelled C2, C3 and C4 as the broad locational area in which strategic waste management facilities should be sited.

WPO7D:

Use area C4 as the broad locational area for strategic waste management facilities. If land is not forthcoming then the fall-back position is to search in areas C2 and C3 and then the wider Zone C.

■ Summary of comments for the above options

7 general representations were received on Section 6 of the WCS as detailed below:

British Waterways welcomed the provision of guidance to members of the public, waste operators and developers alike and wished to lend their wholehearted support to Gloucestershire County Council in the provision and adoption of the document. They were of the view that additional waste facilities should be located in the central area of Gloucestershire close to the greatest population areas of Cheltenham and Gloucester to reducing travel miles etc. 'As you are also considering sites within a 16km search zone from urban areas as long as a sustainable transport linkage are available, you will be well aware sustainable freight transport is always to be encouraged and the Gloucester and Sharpness Canal is suitable for such usage and provides a sustainable transport route for waste transfer. Until more definite locations are under discussion however we cannot add much to the debate other than to request to be kept informed and consulted on further stages of the plans development. If there is any scope for the waterway to be used in this way we would welcome early involvement in any future debate.

Chalford Parish Council felt that it was better that waste is concentrated in one area and that it is not sub-divided.

Cold Aston Parish Council appreciated the complexity of the issue and the importance of reducing waste at source and then handling wastes in the most safe and effective way. They stated that: 'We can see the benefits in concentrating the waste collection and processing along the corridor areas nearest to good transport links and high density of populations. However we would like to make these points: We are concerned that the sites chosen for waste recycling and processing and incineration should be very carefully sited out of the flood danger zone and with careful attention to local geology and air flows so that the

risk of environmental pollution and harm to populations nearby and down wind will be managed carefully. We would like to see clear lines of responsibility for monitoring and reporting to the public'.

Gloucester City Council considered that the Locational Strategy depends to a degree on certain options being selected in the earlier sections. They stated that '...if firm allocations were chosen there would be little need for a locational strategy. However, if we are to go down a broad area of search approach then focussing the whole methodology on what is essentially Junction 12 appears like putting all your eggs in one basket'. In terms of WPO7D they accepted that the site needs to be near transport links but these could potentially be water or rail as well as road. They supported WPO7A with the added criteria that for heat generating facilities there should be a close market for that heat and any residual waste generated. They concluded by stating: '...while broadly supporting the document we have concerns regarding the treatment of AD technology, and the location of large-scale facilities. We suggest that the county bites the bullet and allocates a small number of strategic facilities that are well located with regard to traditional planning constraints plus the proximity to waste arisings, heat market, benign transport modes and final waste disposal facilities, this is the only way of providing certainty for developer and community alike'.

Government Office for the South West (GOSW) stated that the strategy should be careful not to simply repeat national planning policies on landscape, green belt and biodiversity.

Grundon (Waste) Ltd made the following representation: 'We would like to add to our earlier comments regarding the requirement to identify the locations of strategic waste facilities and the need to provide for disposal sites in accordance with RSS Policy W1. We identified that the Core Strategy and Technical Papers acknowledge that there is an ongoing requirement for landfill and therefore a policy is required to achieve this. We explained our view that this is especially important given that the Strategy relies upon the permission at Wingmoor Farm East being renewed to its maximum capacity. If it is not then the ability to dispose of waste to landfill ceases post 2013 with all remaining permitted void being utilized at Wingmoor Farm West and Hempsted. Given the requirement to provide certainty on the location of strategic sites and that there are no alternative options to those existing landfill sites we believe that these three sites should be specifically identified in the Core Strategy as strategic sites'.

Standish Parish Council stated that the Parish Council had resolved to register its objection to any provision in the Waste Planning Strategy which proposed the creation of waste disposal facility at Javelin Park.

WCS Options	Total representations on this option	Supported the option	Partial support for the option	Did not support the option	Those considering it to be their Preferred Option
WPO7A	17	5	7	5	6
WPO7B	15	3	8	4	4
WPO7C	16	3	8	5	4
WPO7D	16	5	7	4	5

A variety of comments were made on these four options as detailed below:

Cory Environmental stated that WPO7B is their preferred option as it offers flexibility whilst recognising the benefits of proximity of strategic waste development to the centres of population.

Friends of the Forest expressed the view that there was insufficient information available upon which to base a firm view regarding these options, however existing waste management and disposal facilities should not be abandoned before they have been fully utilised. Only if there is some safety or climate change related reason should any new facilities come on line before that. All new facilities should be timed to come on stream as and when those existing facilities either become exhausted or unusable. Using the energy minimisation principle, some of the new facilities may well be best sited in the major urban areas (SSCTs), hence the partial support given to option WPO7C.

Clearwell Quarries Ltd considered that the flexibility provided by a broad search for sites is most important as sites will become available at all times throughout the plan period and may be demonstrated to be suitable through the Environmental Impact Assessment process. Recycling facilities should be permitted at all inert waste landfill sites including those operating under the Pollution Prevention and Control Regulations and Exempt sites, such as agricultural improvement schemes.

The Commercial Boat Operators Association raised concerns that in all areas, only the use of road transport is considered, with all the potential adverse effects on the local environment and quality of life this will entail. They stated that: 'When Gloucestershire's waste strategy was first being discussed some years ago, the siting of a waste treatment plan at Sharpness was then the favoured option, the availability of both rail and waterway transport links being considered a positive asset. Though I see that Sharpness is still listed among the potential waste treatment sites. I have been given to understand that a more central site in the County is now favoured which gives no alternative to the use of road transport.

County Councillor – Cllr Jackie Hall stated that: 'I note from the diagrams and text on pages 17 and 32 that the location of a 'major waste facility' will be located in the central area of Gloucestershire proximate to the main urban areas along the M5. This seems to preclude Sharpness as designated site. Although in the Waste Local plan 2002 – 2012 Sharpness features prominently as an area where waste recycling companies are based and where a company also holds a license for the re-use of incinerator ash. Furthermore it is an existing industrialised area. In terms of transportation the main focus appears to be on the road network. There is little reference to any other mode of transport. By precluding Sharpness, other modes of transport such as the use of water and rail are also precluded. Such methods could be considered more sustainable and environmentally friendly and should be considered in any site location. I request that the location at Sharpness is reinstated in the Waste Core Strategy before it is approved by Cabinet'.

CPRE (Gloucestershire Branch) considered that the first priority should be making full use of existing strategic waste facilities. Only when existing facilities are not capable of managing any further waste should new facilities be developed. Accordingly, we are pleased to note the reference in the document (paragraph 107) to husbanding the existing voidspace at current landfill sites. Urban locations are unlikely to be suitable for strategic waste management facilities and areas C1 and C5 are too far from the main waste arisings.

Elliott & Sons Ltd wanted a clearer definition of a strategic facility. They stated that the 16km broad area of search, whilst in line with the RSS, does give maximum flexibility but in sustainable terms a strategic waste facility should be near to the source of waste arisings and logically be located in the central area which would also avoid some of the major environmental constraints covering parts of the County i.e. the floodplain and AONB. However this should be all areas in the central area which should include Green Belt land.

Wiltshire County Council considered that the range of options all appear to conform generally to the draft RSS. However, they stated that WP07A is too broad to be realistic. Policy Options WP07B and WPO7 C/D appear to offer the most appropriate approach for locating new waste management development and are more clearly aligned to the evidence supporting development within the M5 Corridor. However, as with any form of prescription, care will need to be exercised in terms of implementation, particularly if new site proposals are submitted which lie outside of the zonal arrangements presented in WPO7 C/D.

Forest of Dean District Councillor - Cllr Venk Shenoi stated that the selected process option will have a major influence on site selection and operational transport and material flows. WPO7 C or D are more suited to largescale installations of EFW / MRF whereas localised AD / windrow composting can be easily spread out further, close to material source - WPO7A.

Friends of the Earth (Forest of Dean) were of the view that for the WPO7 options strategic facilities/sites should be deleted from the policy as a strategic site would not be required as

waste would be dealt with at the local community level by small facilities of 20,000 to 40,000 tpa.

Friends of the Earth Gloucestershire Network stated that there was a failure of the siting process to ensure that any large facilities are sustainable. They made the point that 'It is frustrating to observe that in spite of the existing capacity the County seems determined to attempt to develop thermal treatment options at Javelin Park. This site seems poorly suited to the need for combined heat and power which is necessary to make the site at all efficient in climate change terms. This is clearly an important planning consideration (Communities and Local Government 2007).

Mrs N. Ginn stated that the options were not imaginative in terms of locations and were worded in such a way that does not give any real choice between them. This a loaded question and suggests that the Council has already done this work and made its mind up where it wishes to locate facilities. The wording suggests that the strategy is being written in order to fit the previously chosen locations. A strategy should not be written to justify actions already taken.

Government Office for the South West (GOSW) considered that WPO7A-D provide a set of broad locations for the provision of strategic waste management facilities. But they further stated that: 'The plan should define more clearly what facilities this will involve. In our view, given the 'strategic importance' of proposals implied by this part of the strategy, a site or sites should be identified as a part of the Core Strategy'.

Hills Minerals & Waste Ltd stated that: 'the flexibility provided by a broad search for sites is most important. Sites will become available at all times throughout the plan period and may be demonstrated to be suitable through the Environmental Impact Assessment process. Recycling facilities should be permitted at all inert waste landfill sites including those operating under the Pollution Prevention and Control Regulations and Exempt sites, such as agricultural improvement schemes'.

Land and Mineral Management Ltd provided similar comments to Hills Minerals & Waste Ltd. In addition they considered that a clearer definition of a Strategic Facility would be helpful. The 16km broad area of search, whilst in line with the RSS, does give maximum flexibility but in sustainable terms a strategic waste facility should be new to the source of waste arisings and logically be located in the central area which would also avoid some of the major environmental constraints covering parts of the County i.e. the floodplain and AONB.

The Malvern Hills AONB Office stated that they were pleased to see that the AONBs are not included in the areas of search for strategic waste facilities.

Natural England noted that in the Habitats Regulations Assessment the effect of these options on European sites was uncertain, with WPO7A having the potential to affect the greatest number of sites (because of the broad search area). Natural England agreed with this assessment, but stated that these options are only acceptable if it can be demonstrated that there would be no residual adverse effect on the integrity of any European sites.

Forest of Dean District Council expressed support for the preferred location though a wider area of search.

The South West Regional Assembly welcomed the fact that the search criteria in draft RSS policy W2 was taken into account. However, they further stated '...the policy follows a sequential approach, looking at locations within or on the edge of the SSCTs and other named settlements in the first instance. The 16km radius as a means of identifying locations in proximity to the SSCTs should be seen as indicative. The RSS Panel Report recommends removing this criterion from the policy and incorporating it into the supporting text. We agree therefore that the focus should be on the urban areas where the majority of the waste arises, which is shown in Figure 9. We note in this case that the Central Severn Vale is constrained by Green Belts and Flood Risk Areas, covering Areas C2 and C3. However, we would like to ask whether a focus solely on Area C4 as outlined under option WPO7d would provide

sufficient flexibility for the development of waste facilities. Option WPO7C appears to be more flexible as it avoids the concentration of facilities in a particular area, but still focuses development on areas served by the primary transport network. We broadly agree with the Locational Strategy, however, with regard to our comments further above this chapter would benefit from the identification of strategic sites'.

Smiths (Gloucester) Ltd stated that: a clearer definition of a strategic facility would be helpful here. The 16km broad area of search, whilst in line with the RSS, does give maximum flexibility but in sustainable terms a strategic waste facility should be near to the source of waste arisings and logically be located in the central area which would also avoid some of the major environmental constraints covering parts of the County i.e. the floodplain and AONB.

Cheltenham Borough Council supported policy option WP07D - as it provides a clear sequential test against which applications can be determined. They were of the view that the policy option provides certainty while retaining flexibility if sites do not come forward. 'This policy option will have to be carefully worded to provide certainty as to the evidence required to be submitted to prove that sequentially preferable sites are unavailable or not viable'.

Stroud District Council considered that Option WPO7A could allow co-sharing of waste facilities on administrative boundaries. 'However there are issues regarding waste movement across a County and whether the District or County would be recorded as dealing with their own waste generation. Therefore Officers support Option WPO7B as it offers flexibility and the greatest opportunity for Districts to meet their own waste needs, without affecting national/international environmental constraints'. There was support for paragraph 109 in that capacity for hazardous waste can be met by the existing site at Wingmoor Farm, Bishops Cleeve.

Safety in Waste and Rubbish Disposal (SWARD) stated that 'it seems to us that the sites are already selected'.

The Environment Agency were of the view that of the four locational policies, WPO7A seemed the most appropriate as it allows for various sites to come forward, and not to be restrictive as to locations. Again this is with a view to flexibility and a holistic view on the various planning and environmental matters.

West Gloucestershire Green Party considered that broad search areas should be used so as not to constrain development. They expressed the view that 'synergies with existing industrial users should be sought as a matter of course!'

Woodchester Parish Council stated that WP07A was preferred provided it takes into account AONB, SSSI and other protected areas.

■ Comments on the Broad Locational Options via the short questionnaire

(Note: further details on this short questionnaire are contained in a separate report)

WCS Options	Total representations on this option	Supported the option	Partial support for the option	Did not support the option	Those considering it to be their Preferred Option
WPO7A	67	29	17	21	19
WPO7B	64	23	25	16	8
WPO7C	66	29	23	14	19
WPO7D	61	26	19	16	18

Terminology

More than one consultee felt that the term 'waste management facilities' needs clarification. It was also mentioned that the question was confusing and there was insufficient information provided to support the question.

Sustainable Transport

Several consultees made comments favouring the use of sustainable transport and that waste should be dealt with as close as possible to the source of arisings. Other consultees suggested bulking sites in the main urban areas with sustainable transport links to processing sites in rural areas. Where specific zones were mentioned in the comments, the most common reasons for selecting zones appeared to be in relation to sustainable transport. Some concerns were raised in relation to increasing traffic congestion in urban areas.

Specific Sites and Technologies

There were positive and negative comments regarding specific technologies or sites. Similar comments were reflected in both questions 1 and 2.

Access to Recycling Facilities / Smaller Facilities

Consultees were in favour of having access to local recycling facilities and some consultees felt that more than one strategic site would be more sustainable.

Areas of Search

In addition to comments already highlighted, some people suggested using the whole county as an area of search and potentially creating a criteria base for determining site suitability.

Environmental and other Constraints

Concerns were raised in relation to developing on floodplains and in the greenbelt.

■ WPA response

Preferred Locational Strategy

The statistics indicate that no clear consensus has emerged from the PO consultation.

WPO7a (broad county-wide search area) – This option was generally favoured as being the most appropriate way forward by the Environment Agency, Cllr Shenoi (Forest of Dean councillor), Mrs Ginn, Land & Mineral Management [Hills, Clearwell], and West Gloucestershire Green Party. However, some respondents considered this to be too broad to be realistic (RPB and Wilts CC). On balance the WPA considers that the broad search area is rather too large to be useful in practice for identifying new strategic sites (i.e. those of <50ktpa processing capacity). To identify specific sites it is necessary to narrow the search down to a small parcel of land and this option demonstrably does not do this. However, the area of search does have merit though in seeking smaller local facilities that may come forward on a windfall incremental basis, and which will be judged against criteria laid down in policy. In addition the broader county-wide search areas maybe suitable where sustainable transport linkages via rail and water can be demonstrated.

WPO7b (urban locations and the area labelled Zone C) - This option reflects a 16km corridor that closely aligns with the strategic road network and was favoured as being the most appropriate way forward for finding suitable strategic sites by Stroud DC, Wilts CC (Minerals and Waste), Smiths, Elliott & Sons and Stoke Orchard PC.

WPO7c (urban locations and areas labelled C2, C3 and C4) - This option favoured as being the most appropriate way forward by Ashchurch Parish Council, Grundon Waste Ltd, Mr Luckett, the Highways Agency, and FoD DC. It was partially supported by Friends of the Forest, Cotswolds Conservation Board, Allstone Sand & Gravel, Wilts CC, Cllr Shenoi, Cheltenham BC and Sunhill Action Group. The main advantage that respondents saw with this approach was the proximity to the waste arisings combined with the flexibility of a comparatively large search area.

WPO7d (area C4 as the broad locational area for strategic waste management facilities. If land is not forthcoming then the fall-back position is to search in areas C2 and C3 and then the wider Zone C) this option explicitly provides a hierarchy within which to search for strategic sites. It was the preferred approach of the Cotswolds Conservation Board, the WDA, Gloucestershire Association of Town & Parish Councils, the Highways Agency (alongside option WPO7c), Cheltenham BC. It received partial support from Friends of the Forest,

Allstone Sand & Gravel, Wilts CC, Cllr Shenoi, Gloucestershire Association of Town & Parish Councils (who also preferred this approach), and Sunhill Action Group. In contrast, it was not supported by those C&D waste operators represented by Land & Mineral Management or Grundon's Waste Ltd. The latter considered that the option presented too narrow a search area and limited strategic sites to one location to the detriment of proximity and flexibility. The WDA doesn't accept that this option is unduly narrow, or that it limits flexibility as the approach gives a clear sequence of search concluding with the wider zone C.

Site Selection

Some respondents (Mrs Ginn, Friends of the Earth, and SWARD) believed that sites had already been selected. The WPA can state categorically that at this point in time no decisions have been taken on the location of any site (or sites) for the purposes of managing residual MSW within the WCS. Additionally, the WDA also has not made a final decision on whether they will be pursuing a single site (strategic) or whether there will be a dispersed (local) solution sought for treating waste that cannot readily be recycled or composted.

A County Council Cabinet meeting in July 2007 did however resolve to investigate the possibility of purchasing a site near to M5 Junction 12 (Javelin Park) whilst exploring other sites (see Technical Evidence Paper WCS-C page 22). However, the landowner of Javelin Park is presently unwilling to sell the site and until this matter is resolved uncertainty remains and it would be inappropriate to prejudge, or prejudice, the outcome of these negotiations (see further consideration below in respect of the RPB and GOSW responses).

Some respondents (Smiths Ltd and Elliott & Sons [both represented by Land & Mineral Management]) consider that the central area of the county represents the best location for waste management facilities as this avoids AONB, flood plain and is located close to the main sources of arisings. The WPA supports this approach and considers that such an approach is reflected by the options (WPO7b-d).

Stroud District Council favour an approach whereby each district is responsible for managing their own waste, a view which is contrary to Chalford Parish Council who prefer waste to be managed in one area not to sub-divided. The WDA are currently considering options for how MSW can best be managed in the county – their assessment includes a financial appraisal as ultimately whichever solution is chosen it will be funded by Gloucestershire tax payers.

Currently a large proportion of Stroud's household waste is sent to Hempstead landfill site (in Gloucester City). Additionally, Stroud District Council's support for having all of the county's hazardous waste managed in Tewkesbury District (at the existing Wingmoor Farm site) is noted.

Flexibility vs Site allocations

The need for flexibility is a key theme that emerged – this was raised by Cory Environmental Ltd, Smiths (Gloucester) Ltd, Elliott & Sons, Hills Minerals & Waste Ltd, Clearwell Quarries Ltd, Land & Mineral Management, Cheltenham BC, Stroud DC, Gloucester City Council, the West Gloucestershire Green Party and the Environment Agency. Crucially the WDA, who support Option WPO7d with a fallback potential to Option WPO7c, prefer a more flexible approach. The SW RPB also considered flexibility as being important but concluded by stating that the WCS would benefit from the identification of sites. The response from GOSW similarly stated that the WCS should define clearly what facilities the locational strategy will involve with a site or sites identified in the WCS. The GOSW, CPRE, Gloucester City Council, Grundon's and the SW RPB support the identification of specific sites in the WCS.

The importance of synergies with existing site users is a key issue for waste management and one which is addressed in the technical evidence paper WCS-C. Synergies are reflected in a number of ways – proximity to heat/energy clients for CHP (see below); proximity to markets for the materials that result from waste treatment (e.g. compost, pelletised plastic, fuel etc.); proximity to disposal facilities for final residues (landfill); or proximity to industries that have similar environmental impacts (generally classed as B2 general industrial uses).

In terms of Option 6 (recovery options) the WDA prefer the approach that follows broad locations (WPO6d). The WDA is currently preparing a Residual Waste Procurement Plan

which will set out the type and size of technology that Gloucestershire will use to manage its residual municipal waste. At this point in time these have not been decided, therefore contrary to the demands of GOSW, the WPA is unable to state exactly what facility will be needed or where it will be. Consequently, it is important that whichever search area is finally selected as the appropriate approach for identifying strategic waste management facilities that the WPA maintains the flexibility to look beyond the zones should there be a lack of suitable sites within the preferred zone areas (as suggested by Wilts CC). However, as noted by Cheltenham BC, the WPA considers that it is important that the appropriate evidence is provided to demonstrate which sequentially identified sites are available.

One of the key issues to be overcome in respect of GCC purchasing the site is reaching an acceptable position with an unwilling land owner – a factor that PPS10 specifically warns WPAs to avoid when allocating waste sites in development plans. Until this issue is resolved, and a particular technology for managing the waste is selected, the WPA is unable to be more specific than at present. To do so could severely prejudice delivery of MSW waste facilities in Gloucestershire. The WPA put forward a policy option (WPO6b) that would allow these 'gaps' to be completed when firm decisions have been taken, however the WDA did not favour this policy option – preferring instead a more flexible approach. This issue was raised with GOSW prior to the PO consultation, and reiterated in the technical evidence papers.

This issue of specific technologies applies not only to MSW but also to the other waste streams. Meeting with individual operators helped the WPA to generate ideas about possible directions for waste facilities but no firm proposals about technologies were made by operators. Consequently, the WCS PO document (see paragraph 41) represents the most specific that the WPA can be in respect of identifying technology types at this point in time. In summary, Gloucestershire will require the following additional capacity to manage its waste:

For **MSW**:

- Between 11kt and 26kt IVC capacity
- 76kt recycling capacity
- 150kt –270kt residual treatment capacity

To manage **C&I waste** the following additional capacity is needed:

- By 2020/21 additional diversion of 145kt per annum from landfill (assuming 0% growth in this waste stream).

To manage **C&D waste** the following additional capacity is required:

- By 2012 diversion of an additional 111kt per annum from landfill (in addition to current capacity for managing Construction and Demolition waste at existing sites) – to halve the amount currently being sent to licensed landfill sites.
- 'Exempt' capacity to use inert material for land restoration (e.g. worked out mineral sites).

Timing of Waste Facilities

Planning for waste management facilities takes a considerable amount of time, not least to prepare environmental impact assessments and to put in place financial and contractual agreements. To operate waste management on a 'just in time' model, replacing only when and if existing facilities become exhausted, is neither practical nor realistic.

CHP

The WDA is currently examining the potential for combined heat and power (CHP) in respect of the possible waste management options that they are considering. This links to the idea of synergies with existing users. The proximity of facilities to the energy client(s) is an important consideration, but one that needs to be balanced against the concerns of the community to have waste facilities in close proximity to their homes/places of work. Meeting both of these concerns is a challenge but one that needs to be addressed at the early stages when planning large scale new development in order that CHP linkages can be installed. This is one of many considerations in terms of locating strategic waste development (other issues

include AONB, flood plain, nature conservation etc.) and the WDA's final technical solution will be important in terms of selecting the most appropriate site. There maybe scope to consider strategic sites for waste management being located alongside areas for additional housing or other development. The Proposed Modifications of the RSS provide some broad indications of where such development might take place. However the detailed locations for such development will need to be contained within the Core Strategies prepared by the District Planning Authorities. This raises issues of timescale synergies with the Core Strategies and will need to monitor carefully to ensure now good opportunities with CHP using waste as a source is not missed.

Strategic Waste Facilities Definition

The need to clearly define what constitutes a strategic site was raised by Smiths Ltd and Elliott & Sons (both represented by Land & Mineral Management). This definition is already clearly stated in evidence paper WCS-F 'Making Provision for Waste Management Facilities' (paragraphs 45-53), which is 50,000 tpa capacity and above.

Sharpness Docks Location

Stroud DC made representations that they are concerned about the use of Sharpness Docks for waste management purposes (see WPA consideration of representations to WCS Section 2 Spatial Portrait). This position contradicts discussions GCC held with Stroud DC officers as set out in evidence paper WCS-MCS-2 (page 27). Additionally the docks are already a significant location for waste management operations (metal transfer and in vessel composting).

Contrary to Stroud District Council's stance, other respondents have commented that they do wish to see Sharpness Docks used as a strategic waste management facility to make best use of sustainable transport (water) modes. British Waterways state that the canal is suitable for waste transportation "*the Gloucester and Sharpness Canal is suitable for such usage and provides a sustainable transport route for waste transfer*".

However, whilst such an option could make use of the canal, the waste material still needs to be transported by road from peoples' houses to the transfer station from where it is put onto a barge. If a waste treatment facility were built at the location of the transfer station then this would negate the need to use the canal. In such circumstances it would not be sustainable to double handle waste just so that it can be barged to a facility where a closer facility would negate this second leg of the journey. Notwithstanding this, in respect of sustainable transport, WPO7a clearly states that "*strategic sites that are remote from arisings could be appropriate if they are able to demonstrate sustainable transport linkages*".

The way forward - Sequential search strategy

The RSS (Policy W2) follows a strategy whereby waste is managed near to the source of arising, using a sequential search process. The WCS PO options WPO7A - D demonstrably do this. In light of the lack of consensus on which is the appropriate strategy to follow the WPA considers that a thorough search of the whole County (as per WPO7A), but with a view to preferring sites closer to sources of arisings (as per WPO7B) may be most appropriate. To narrow the search to a small area to the south of Gloucester (as per WPO7D) would unnecessarily constrain the search in terms of allowing maximum flexibility for choice of site, especially given the unwillingness of landowners in Zone C4 to allow waste management uses on their site. Flexibility was considered to be a key factor by many stakeholders (see WPA consideration above).

As introduced at the beginning of this response report the WCS will now progress forwards (including strategic sites). In this process the stakeholder's comments, as detailed in this report, will be appropriately considered and reflected as the WCS moves towards submission to the Secretary of State. The new programme for WCS and other DPD preparation is outlined in the latest revision of the Minerals & Waste Development Scheme, available on the County Council web page. In broad terms this will include consultation on strategic site options during summer 2009 before moving toward proposed submission stages.

Environmental Acceptability Options

WPO8A:

Proposals for hazardous waste development at existing hazardous waste facilities in Gloucestershire must demonstrate 'environmental acceptability'. In order to do this the following criteria will need to be met: There should be no significant adverse impact on the environment – on land, air or water that are not capable of stringent and successful mitigation measures. Where the effects are uncertain the precautionary principle should be invoked. There should be no significant adverse impact (including any cumulative impacts), on the following that cannot be successfully controlled, mitigated or attenuated:

- The quality of life, amenity and health of local residents and other land users;
- Any designated site for nature conservation;
- The countryside and the traditional landscape character of Gloucestershire;
- Access and the local highway network;
- The potential for successful land restoration.

WPO8B:

Proposals for hazardous waste development at existing hazardous waste facilities in Gloucestershire must demonstrate 'environmental acceptability'. In order to do this the following criteria will need to be met: There should be no significant adverse impact on the environment – on land, air or water that are not capable of stringent and successful mitigation measures. Cumulative impact should also be considered. Where the effects are uncertain the precautionary principle should be invoked. Factors that should be included in an assessment of 'environmental acceptability' include:

- The quality of life, amenity and health of local residents and other land users;
- Impacts on neighbouring land-uses (including the local road network) and the potential for the achievement of appropriate 'stand-off distances' between the facility and residential properties;
- The type and scale of the facility taking account of best available technologies (not involving excessive costs);
- The need for the facility, the way it sits with existing activities and the potential wider environmental implications of not managing the waste stream;
- Potential for successful land restoration issues.

□ Summary of comments for the above options

WCS Options	Total representations on this option	Supported the option	Partial support for the option	Did not support the option	Those considering it to be their Preferred Option
WPO8A	17	3	10	4	1
WPO8B	19	16	3	0	13

A variety of comments were made on these two options.

Friends of the Forest considered that Option WPO8B was positive in terms of meeting the Government's objectives in relation to community involvement, but they were concerned that the technical facts (and examples were outlined in the representation) were appropriately 'laid on the table.' Some stakeholders considered that a change was not needed from the WLP and that some of the criteria identified e.g. health issues were matters for EA licensing. Change for change sake could result in suitable waste management facilities not being brought forward. Wiltshire County Council considered that WPO8B better reflects the views of stakeholders and references cumulative impact assessment as thus should be progressed.

Grundon Waste Ltd favoured Option WPO8A – with appropriate amendments. They comment that the policy should refer to any future hazardous waste development rather than just existing hazardous waste facilities. 'This would ensure that the WCS is capable of addressing new technologies for the management of hazardous wastes'. Grundon consider that neither Option A or B follows RSS Policy W3 with respect to safeguarding capacity and that neither option takes account of a site's contribution to national and regional need for hazardous landfill. There is a comment that cumulative impacts are considered and dealt with in WPO11 and thus should not be duplicated in WPO8A & B. Other criteria Grundon consider unnecessary or unwarranted are buffer zones, taking into account Best Available Technology (BAT) and a requirement that applicant demonstrate market need. They state that the third part of Option A should be replaced with the same wording as in WPO4B, C and D and WPO6C and D. There should also be a reference to the implications of not managing waste. They consider that the reference to the 'precautionary principle' is not appropriate – and only relevant for new development. Forest of Dean District Council consider Option B is more reflective of stakeholder suggestions. Natural England took the view that WPO8B is weaker

than A in terms of nature conservation and the protection of landscape character. They pointed to the SA and the AA reports as confirming this.

Cheltenham Borough Council had no preference, but pointed to the fact that 'significant adverse impact' needs to be defined for both options.

Stoke Orchard Parish Council were of the view that greater account should be taken of how unacceptable the reduction of air quality can be in any identified area of waste activity.

Woodchester Parish Council considered that WPO8B was seen as more democratic, looking at 'environmental acceptability' in the light of local comment.

Stroud District Council supported WPO8A, building on the strengths of existing policies. Option WPO8B is objected to on the grounds that it uses the following criteria: Best Available Technology Not Involving Excessive Costs (BATNIEC), standoff distances and the impact on waste streams.

Safety in Waste and Rubbish Disposal (SWARD) considered that there needs to be a definition of 'significant adverse impact'. They stated that 'It is imperative that sites such as Sunhill, Wingmoor Cory and Wingmoor Grundon have no impact at all outside their sites. Operators should factor the costs for ensuring this into gate fees. They requested that reference to 'not involving excessive costs' should be deleted and also the word 'issues' – the last word of WPO8B.

The Environment Agency expressed a preference for WPO8B, but stated that it could be improved with the addition of designated sites for nature conservation as a factor to be included. They considered that opportunities for enhancement had been missed as this could be remedied by the inclusion of the following: 'Opportunities for enhancement of environmental features will be sought wherever possible. This will aid the proposals environmental acceptability.'

West Gloucestershire Green Party expressed the view that there needed to be further consultation with the local community.

Sunhill Action Group expressed the view that in these matters, local communities were more reliable than the waste industry and that the term NIMBYISM was not accepted.

■ WPA response

In looking at the statistics for options WPO8A and WPO8B there was more support from respondents for WPO8B. In response to Grundon's comments that neither policy reflects RSS Policy W3, with respect to safeguarding capacity and taking account of a site's contribution to national and regional need for hazardous landfill, the WPA consider that RSS Policy W3 adequately covers these issues. What Policy W3 does not do is define the term 'environmental acceptable', thus the need for WPO8A or B. At this stage, the WPA is carefully considering which combination of options to take forward in the next stages of the Waste Core Strategy (WCS). As stated earlier in this response report, the WPA will include consultation on an options stage during summer 2009 before moving toward proposed submission stages. Technical matters such as respondents concerns over e.g. BATNIEC and appropriate standoff distances will be addressed.

Waste Infrastructure Options

WPO9A:

The development or expansion of water supply or waste water facilities will normally be permitted, either where needed to serve existing or proposed development in accordance with the provisions of the development plan, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweigh any adverse land use or environmental impact and that any such adverse impacts can be satisfactorily mitigated.

WPO9B:

Defer preparation of a policy on waste water infrastructure to the development control development plan document, where specific criteria will be provided for determining proposals.

□ Summary of comments for the above options

WCS Options	Total representations on this option	Supported the option	Partial support for the option	Did not support the option	Those considering it to be their Preferred Option
WPO9A	12	6	3	3	3
WPO9B	10	6	2	2	5

A variety of comments were made on these two options as detailed below:

Friends of the Forest considered that further studies were needed with the involvement of e.g. the water utilities, the Environment Agency, and Natural England. They considered that this topic is a generic matter that needs to be addressed at national / regional level rather than be limited to the County boundary.

CPRE (Gloucestershire Branch) were of the view that this matter would be best addressed in the development control development plan document. It is an issue that requires further consideration.

Wiltshire County Council considered that the issue of waste water infrastructure is intrinsically linked to wider development pressures in Gloucestershire. As such, it is important to consider whether additional capacity will be required over the Plan period and, if so, where. The approaches offered within the two preferred options are not easy to compare particularly as WP09B effectively defers consideration of the issue to the (yet to be produced) Development Control Policies DPD. Option WP09A attempts to address the issue at the strategic level and offers the potential for additional capacity to be delivered where need arises. In the absence of a clear set of locational requirements, it is difficult to gauge where sewerage infrastructure pressures exist. However, the notion of utilising PPS10 to assist with the process of guiding the location of new development appears to provide a sensible approach.

Forest of Dean District Councillor - Cllr Venk Shenoi stated that WPO9A can be operated until WPO9B is introduced.

The Forest of Dean District Council were of the view that decisions should be deferred in order to take better account of developing technologies.

Stroud District Council conditionally supported WPO9A. They stated that 'The term 'will normally' must be removed as PINS have resisted this local plan policy phrase on clarity grounds'.

Safety in Waste and Rubbish Disposal (SWARD) offered for consideration the inclusion in infrastructure - the machinery for dealing with kerbside and bring bank collection – 'mobile infrastructure'.

The Environment Agency welcomed a policy being included in the Core Strategy. The suggested wording should be added to along similar lines as suggested, 'opportunities for enhancement of environmental features will be sought wherever possible'. This will aid the proposals' environmental acceptability - so that enhancement is also included.

Thames Water submitted fairly lengthy comments on these options and they are detailed here in full: 'Paragraph 117 'Provision for sewage treatment facilities' - Further to our representations to the Waste Core Strategy Evidence Paper 'Sewage Treatment Works' in August 2007, we support Option WPO9A. However, the policy needs to be amended to relate only to waste water facilities and not water supply facilities as these are not a county waste matter. We also support paragraph 116. Paragraphs B3 to B8 of PPS12 place specific emphasis on the need to take account of infrastructure such as sewerage in preparing Local Development Documents. Paragraph B3 in particular states: 'The provision of infrastructure is

important in all major new developments. The capacity of existing infrastructure and the need for additional facilities should be taken into account in the preparation of all local development documents. Infrastructure here includes water supply and sewers, waste facilities'. Section 7.3.12-7.3.14 of the Draft South West RSS, June 2006 relates to Sustainable Water Resources and Water Quality Management. Policy RE6 lists a number of water and wastewater/sewerage infrastructure issues which local authorities should take into account in preparing Local Development Documents. Option WPO9A is important as it is not always possible to identify new waste water treatment plant requirements in advance of the plan preparation. Water company's investment and price setting are regulated by the Office of Water Services (Ofwat) through the 5 yearly Asset Management Plan (AMP). As a result we base our investment programmes on development plan allocations which form the clearest picture of the shape of the community (as mentioned in PPS12 paragraph B6). We require a three to five year lead in time for provision of the extra capacity. Where a complete new water or sewage treatment works is required the lead in time can be between five to ten years. However, as our investment is based on a 5 yearly cycle and because we cannot always predict the land use impacts of new European and UK requirements relating to waste water treatment, we cannot plan for all operational development which may be needed over the plan period. Therefore there is a clear need for the general Criteria Based Policy as well as identifying any specific proposals for waste treatment facilities in the Waste LDDs'.

Woodchester Parish Council stated that waste water management has to be seen in relation to existing or proposed developments. Deferring policy may have an arbitrary effect on planning and development in specific areas.

■ WPA response

In terms of the respondent statistics on these options, there was no clear consensus, and the WPA consider that the lack of representation from Severn Trent Ltd on these options is somewhat regrettable as it is the water utility company covering the majority of the County. The Environment Agency welcomed a policy being included in the WCS and Friends of the Forest recommended the further involvement of water utilities, the EA and Natural England. The WPA welcome the detailed representation from Thames Water – clearly this is important given the content of these policy options. In addition the revision of PPS 12 (June 2008) highlights a potential relationship of this issue with the preparation of Infrastructure delivery planning and thus is an important area of evidence to support the policy direction.

Safeguarding Options

WPO10A:

Existing sites in permanent waste management use (including sewage and water treatment works) and proposed sites for waste management use will be safeguarded by local planning authorities. The waste planning authority will normally oppose proposals for development within or in proximity to these sites where the proposed development would prevent or prejudice the use of the site for waste management development.

WPO10B:

Existing and allocated sites for waste management use* will be safeguarded by local planning authorities, who must consult the waste planning authority where there is likely to be incompatibility between landuses. Proposals that may either adversely affect, or be adversely affected by, waste management uses should not be permitted unless it can be satisfactorily demonstrated by the applicant that there would be no conflict. The waste planning authority will oppose proposals for development that would prejudice the use of the site for waste management.
[*this includes sewage treatment works]

■ Summary of comments for the above options

WCS Options	Total representations on this option	Supported the option	Partial support for the option	Did not support the option	Those considering it to be their Preferred Option
WPO10A	16	3	8	5	1
WPO10B	22	16	4	2	15

A variety of comments were made on these two options as detailed below:

Grundon (Waste) Ltd stated that they supported WPO10B as it is tangibly firmer in favour of safeguarding permitted waste sites and allocations.

CPRE expressed the view that they could support both options, but had a preference for WPO10B as it was clearer in its intent.

Allstone Sand & Gravel expressed the view that: Any identified sites (or indeed existing sites) need to have absolute certainty in terms of their deliverability. This has not occurred with the existing Waste Local Plan and there needs to be a considerable strengthening of this approach.

Cory Environmental Ltd made the comment that the need to protect waste allocation sites has been highlighted by recent planning decisions. WPO10B offers a greater scope for the protection of allocated waste sites and is welcomed by Cory.

Friends of the Forest stated that 'the current text is to vague for us to express any real view'.

Elliott & Sons Ltd considered that WPO10B appears a stronger policy and the planning system does need to be able to deliver safeguarding as matter of priority for existing and any identified sites.

Wiltshire County Council made the comment that policy option WPO10B arguably offers the best solution for safeguarding new/existing waste management facilities. It accepts the need to review the existing policy approach and therefore provide a more flexible methodology for designating safeguarding/consultation areas that fully consider changing circumstances.

Land and Mineral Management Ltd stated that WPO10B appears a stronger policy and the planning system does need to be able to deliver safeguarding as matter of priority for existing and identified sites.

The Forest of Dean District Council stated that they supported WPO10B as it offers greater flexibility. The impact of safeguarding and of consultation areas needs to be fully taken into account, both in order to enable waste related development to take place but also to ensure that safeguarding does not unduly compromise other developments in what may be areas within which a variety of mixed developments are being encouraged. It is assumed that in all cases the waste related development itself will be regulated so that its impact is well regulated and in keeping with best practice. the waste proposals will need to be compatible with the development plan as a whole and will need to take full account for example of proposals where a regeneration strategy is being followed and which may involve fundamental changes over the long term in the mix of uses that are acceptable in a given area. Inappropriate development or safeguarding can have a disproportionate impact on an area.

Smiths (Gloucester) Ltd expressed support for policy option WP010a as WP010b suggests an increasing role for local planning authorities in the planning of waste sites, which local planning authorities would not necessarily have the relevant skills to perform.

Stroud District Council supported WPO10B as it does not have the 'will normally' wording clause and it takes account of recent planning decisions.

Safety in Waste and Rubbish Disposal (SWARD) questioned the use of the word 'normally' in WPO10A as it suggests that there is potential for some sort of loophole. They stated that: 'The thrust of the paragraph suggests that the existence of a potential site could cast a planning blight on a neighbour's legitimate right to develop his land within the law, because his land may be needed as a buffer zone'. 'For WPO10B we suggest that the words "...should not be permitted..." be deleted and substituted with "... shall not be permitted..." This is more robust and reflects the thinking in the next sentence "...will oppose proposals..." '.

The Environment Agency stated that they preferred policy WPO10B as it is more encompassing. This is considered to be more 'future-proofed'.

Thames Water Utilities Ltd objected to the identification of any of its operational waste water/sewage treatment works as 'safeguarded' sites for alternative waste treatment facilities. It is considered that the safeguarding of such sites does not accord with Government guidance as there is no certainty that the sites would be available for alternative waste facility redevelopment.

West Gloucestershire Green Party considered that [the WCS] needed to be revised in the interests of public participation and consultation.

Woodchester Parish Council stated that 'WP010B addresses incompatibility between lower uses and conflict issues. Consultation between the LA and WPA is essential in an area with a potential to engender local concerns'.

■ WPA response

The WPA recognises that there was a clear preference from the respondents who commented on these safeguarding options for WPO10B. Of the 22 respondents who commented on WPO10B, 20 expressed full or partial support. It was generally regarded as a stronger policy and 'clearer in its intent'. At this stage, the WPA is carefully considering the option or combination of options will be taking forward but at the next 'Options' stage of WCS preparation.

Cumulative Impact Options

WPO11A:

Cumulative impacts could be included as part of the delivery mechanism for Strategic Objective 5. The specific part of the delivery mechanism to which this issue relates, as set out in Section 7, states:

'To co-locate complementary facilities together, reflecting the concept of resource recovery parks, where the cumulative impact is not unacceptable on the host location.' The following wording could be added to the end of the bullet point: '...in terms of significant adverse impacts on environmental quality, social cohesion and inclusion or economic potential.'

WPO11B:

As part of the process to identify suitable sites and areas for waste management for new or enhanced waste management facilities, the cumulative effects of previous and existing waste disposal facilities on the well-being of local communities will be considered alongside the potential benefits of co-locating complementary facilities together. For facilities that come forward on unallocated sites, a similar cumulative impact assessment will be required. In terms of any significant cumulative impacts, careful consideration should be given to potential adverse impacts on:

- Environmental quality;
- Social cohesion and inclusion; and
- Economic potential.

Within these broad categories, the following impacts on local communities should be given particular attention, both in terms of any individual impact and in terms of any potential

cumulative impacts:

- Impact of noise
- Impact of smell
- Traffic impact*
- Visual impact
- Impact of dust
- Health impacts

**Traffic impacts should be afforded particular attention as they are diffuse by their nature and thus not contained on sites.*

■ Summary of comments for the above options

WCS Options	Total representations on this option	Supported the option	Partial support for the option	Did not support the option	Those considering it to be their Preferred Option
WPO11A	18	6	9	3	6
WPO11B	18	11	3	4	11

A variety of comments were made on these two options as detailed below:

Grundon (Waste) Ltd supported WPO11A, and considered that the issue could be dealt with in Objective E. They stated that this is a key requirement of PPS10 and so may not need to be replicated in the Core Strategy.

Allstone Sand & Gravels and Smiths (Gloucester) Ltd considered that some of the phraseology was subjective.

Friends of the Forest referred to their comments for the WPO8 options.

Elliots & Sons Ltd questioned the appropriateness of the policies and considered terms such as 'social cohesion' and 'economic potential' too subjective.

Wiltshire County Council supported WPO11A as they found the argument for a specific policy unconvincing.

Forest of Dean Cllr Venk Shenoi considered that there was a need for cumulative impacts to be tracked.

CPRE (Gloucestershire Branch) preferred WPO11B as it was much clearer in its intent. A number of respondents considered that a policy on cumulative impacts was not necessary as it is considered through EIA.

Natural England offered support for either option on the assumption that environmental quality covers impacts on both biodiversity and landscape.

The Highways Agency requested that, along with environmental quality, social cohesion and inclusion and economic potential, reference should be made to accessibility and sustainable transport considerations.

The Forest of Dean District Council supported WPO11B, but stated that reference to other DPD policies will be essential.

Stoke Orchard Parish Council considered that the cumulative impacts of the past thirty years of landfilling had been disastrous for local communities. Poor air quality and waste transport movements should be addressed in strategic objectives.

Woodchester Parish Council supported WO11B as it 'actively considers effects of previous and existing policy...'

Stroud District Council favoured WPO11B.

The Environment Agency favoured WPO11B. They considered that bioaerosols may need to be included in the supporting text. Cheltenham Borough Council had no preference for either option A or B.

Safety in Waste and Rubbish Disposal (SWARD) supported Paras 122 and 123 and preferred WPO11B.

■ WPA response

Generally WPO11B was favoured by respondents; of the 18 respondents who commented on WPO11B, 11 fully supported the options and stated that it was their preferred option, whilst 3 expressed partial support. However there was a reasonably high degree of partial support for WPO11A, which suggests that there may be scope for including cumulative impacts as part of the delivery mechanism for Strategic Objective 5, but the wording may need clarifying or expanding e.g. potentially as per the comments from Natural England and the Highways Agency.

Landuse Designation Options

WPO12A:

Proposals for waste development within or affecting the setting of areas of outstanding natural beauty will only be permitted where:

- There is a lack of alternative sites not affecting the AONB to serve the market need; and
- The impact on the special qualities of the AONB (including the landscape setting and recreational opportunities) can be successfully mitigated. In the case of major development proposed in the AONB a proven national interest needs to be demonstrated. Approval will only be granted in exceptional circumstances following the most rigorous examination.

WPO12B:

This option uses national guidance on AONBs as set out in PPS7. It would thus not require a policy in the WCS. However, in the supporting text, important issues for the three AONBs in Gloucestershire – Cotswold, Wye Valley and Malvern Hills, would be highlighted alongside references to key relevant sections of specific AONB Management Plans.

□ Summary of comments for the above options

WCS Options	Total representations on this option	Supported the option	Partial support for the option	Did not support the option	Those considering it to be their Preferred Option
WPO12A	23	12	9	2	11
WPO12B	19	8	8	3	6

A variety of comments were made on these two options as detailed below:

Friends of the Forest partially supported both options. They made clear that the SW RSS recognises that there are landscape areas in the SW e.g. parts of the Forest of Dean that, although yet to be nationally designated, are in need of protection.

The Cotswolds Conservation Board welcomed reference to AONB Management Plans and the local element to national policy.

Elliot and Sons Ltd considered that there is a need for well designed local waste facilities in the AONB and objected to the need for a consideration of alternatives outside AONBs.

Wiltshire County Council suggested that a combination option should be pursued.

Forest of Dean Friends of the Earth requested that reference to strategic sites be deleted from the policies as these would not be needed. They supported WPO 2A with the addition of the Forest of Dean as an area of constraint equal to an AONB following the alignment of the 1947 Hobhouse Map, taking into consideration the work of Natural England and the Forest of Dean District Council with the view to considering a new AONB designation in the District.

CPRE (Gloucestershire Branch) were in favour of Option A but wanted clarification on the terms 'major development' and 'throughout Gloucestershire' They welcomed the reference to AONB Management Plans in Option B.

Land & Mineral Management and Smiths (Gloucester) Ltd considered that there was a need for well designed local waste facilities without the need to consider alternative locations outside designated AONB. Catering for local use would represent a sustainable approach.

Woodchester Parish Council considered that although there was some overlap with existing AONB guidance in PPS7 but WPO12A has the advantage of spelling it out in detail - safeguarding AONBs.

The Malvern Hills AONB Office strongly supported WPO12A, but they welcomed the reference to AONB Management Plans in WPO12B.

Natural England supported a separate policy on the grounds that it provides greater clarity for developers and the local community. They suggested that including supporting text from AONB Management Plans was a good idea and this should be combined with WPO12A.

The Forest of Dean District Council indicated support for WPO12B.

Stroud District Council considered that WPO12B was preferable provided reference to PPS7 and RSS policies were given.

The Environment Agency supported the wording in WPO12A.

■ **WPA response**

There was clearly more support from respondents for a specific Gloucestershire focused AONB policy rather than just a reliance on national policy. However several consultees were very positive about the reference to AONB Management Plans in WPO12B. In the next round/stage of Preferred Options consultation it is likely (although this is not a definite view at this stage) that a modified AONB policy will be presented taking on board the useful and informed suggestions of stakeholders. However the WPA will be mindful of Government policy on landscape and in particular the revision to PPS 12 (June 2008) which requires planning authorities to carefully consider that development plan should not repeat national policies.

WPO13A:

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

WPO13B:

No specific policy in the WCS but text in the WCS to state that waste development proposals will be determined in accordance with national policy set out in PPG15 and PPG16 for national archaeological issues.

■ **Summary of comments for the above options**

WCS Options	Total representations on this option	Supported the option	Partial support for the option	Did not support the option	Those considering it to be their Preferred Option
WPO13A	17	9	4	4	6
WPO13B	19	11	5	3	10

A variety of comments were made on these two options as detailed below:

The Regional Planning Body considered that a policy on archaeology is useful, but they stress the pressing need for new waste management facilities.

Grundon (Waste) Ltd supported Option B, stating that national planning guidance should be used wherever possible and a number of other respondents stated that national policy was sufficient.

Friends of the Forest considered that regionally important archaeological issues needed to be considered.

CPRE (Gloucestershire Branch) preferred WPO13A.

Woodchester Parish Council preferred WPO13A, stating that national policy on this subject was much vaguer than WPO13A.

■ **WPA response**

There was no clear consensus from respondents on this issue but the limited statistics indicated that the majority of stakeholders considered that the national policy on this matter as contained in PPG15 and PPG16 may be sufficient. The WPA will be mindful of Government policy on archaeology and in particular the revision to PPS 12 (June 2008) which requires

planning authorities to carefully consider that development plan should not repeat national policies.

WPO14A:

No specific policy in the WCS but text in the WCS to state that waste development in the green belt is to be in accordance with PPG2 & PPS10.

WPO14B:

(Part A) Waste management in the green belt (not re-using an existing building)

Waste management development in the green belt (not re-using an existing building) will need to demonstrate a particular identified locational need to contribute to sustainable waste management in Gloucestershire. This would require rigorous justification against the following criteria:

It will only be permitted in very special circumstances where it does not conflict with the purposes of the green belt designation. For Gloucestershire, the following may constitute 'very special circumstances':

- The facility is of a type that can demonstrate particular locational needs by being:
- a) Proximate to major sources of waste arisings; or
- b) Directly linked to landfill or other waste management operations enabling significantly reductions in the amount of waste going to landfill. The wider environmental and economic benefits of sustainable waste management in the green belt are also material considerations that should be given significant weight.

(Part B) The re-use of a building for waste management purposes in the green belt

The re-use of a building for waste management purposes in the green belt will be permitted provided:

- a) It does not have a materially greater impact than the present use on the openness of the green belt and the purpose of including land in it;
- b) The building is of permanent and substantial construction and is capable of conversion without major or complete reconstruction; and
- c) The form, bulk and general design of the buildings is in keeping with its surroundings. Poor design will be rejected.

WPO14C:

A statement in the WCS requiring alterations to the defined green belt boundary, by means of appropriate 'inset' sites, to meet any specific identified need for waste management facility(s).

■ Summary of comments for the above options

WCS Options	Total representations on this option	Supported the option	Partial support for the option	Did not support the option	Those considering it to be their Preferred Option
WPO14A	20	6	6	8	5
WPO14B	15	9	5	1	7
WPO14C	17	3	10	4	2

A variety of comments were made on these three options as detailed below:

Allstone Sand & Gravel were clear that due to the lack of sites and given the need to locate waste sites centrally, there needed to be an indication that green belt can be used in line with the provisions of PPS10.

Cory Environmental expressed the view that the policy should take into consideration the circumstances in which an allocated site is located within the green belt. They propose the following modification to WPO14B – Part A 'It will only be permitted where it is an allocated site or in very special circumstances...'.

Friends of the Forest considered that WPO14B and C have more merit than A. (Possibly the intention was to state that A and B have more merit than C, given their following comments: 'It does not seem appropriate that green belt boundaries should be altered simply to meet waste management arrangements...')

Woodchester Parish Council stated that 'WPO14B only permits development on a existing building, other options allow for the 'erosion' of the green belt'.

Elliot & Sons Ltd as well as Land and Mineral Management expressed the view that PPS10 and the RSS sequential test allow sites to be looked at in the green belt. They state that there needs to be clear policy guidance to support this. WPO11B could have additional criteria on

design, no unacceptable adverse impacts and recognition that a lack of urban sites can be a justification for a green belt site. Amending green belt boundaries would be useful but safeguarding is also an important issue. More guidance is needed on 'specific identified need' which should include existing waste operations in the green belt.

Friends of the Earth (Forest of Dean) made the comment that communities should take the responsibility of dealing with the waste they produce and that decision making should reside with local communities. They advocate small residual waste facilities (20,000 – 40,000 tpa) on small sites around Gloucestershire with the choice of facility resting with the host community. They request that strategic sites be deleted and also request that community level small scale facilities be assessed through the Sustainability Appraisal. They also make the comment that the consideration of the Forest of Dean as a new AONB needs to be considered.

CPRE (Gloucestershire Branch) made the comment that they would prefer to have the green belt position made clear by appropriate policy in the Core Strategy. They do not consider that proximity to arisings constitutes 'very exceptional circumstances' and believe that this reference should be removed. They were not supportive of alterations to green belt boundaries to accommodate waste management facilities.

The Highways Agency reiterated their comments made at the Issues and Options stage. They note the approach in PPS10 and request that in considering the wider environmental and economic benefits of proposals, the full impact of a proposal on the Strategic Highway Network should also be considered in policy criteria.

Grundon (Waste) Ltd supported WPO14A. They were of the view that national planning guidance should be used wherever possible. They stated that Option B goes well beyond the requirements as set out in PPG2.

The Forest of Dean District Council were of the view that 'the principle of flexibility is recognised - though the need to make only well justified alterations to the green belt is acknowledged.

Smiths (Gloucester) Ltd considered that waste development in the green belt is essential to providing sustainable waste management and that this is confirmed by PPS10 and the sequential test in the RSS. Amending green belt boundaries may be useful and more guidance is needed on 'specific identified need'.

Cheltenham Borough Council were of the view that a policy should be included only if it exceeds national policy.

Stroud District Council supported WPO14B and WPO14C on the basis that they were supported by Technical Evidence Paper WCS-1.

The Environment Agency took the view that green belt boundaries may need to be more flexible where waste facilities are concerned. They did not have a preferred approach.

■ WPA response

The results from respondents on these options were generally mixed with no real consensus emerging. Generally the waste industry expressed the view that development in the green belt is essential to providing sustainable waste management that national policy in PPG2 and PPS10 may be sufficient and that amending green belt boundaries may be useful. Other stakeholders expressed concern about the 'erosion' of the green belt. In response to Elliot & Sons Ltd plus Land and Mineral Management and others view that the RSS sequential test allow sites to be looked at in the green belt, the WPA would point out that there is no mention of green belts in any of the draft waste policies themselves i.e. W1 to W4 and the reference to green belts in the text at para 7.4.8 is now deleted in the Secretary of States Proposed Changes to the RSS (July 2008).

Cory Environmental's view and proposed modification to WPO14B – Part A '*It will only be permitted where it is an allocated site or in very special circumstances...*' is complicated by the fact that the sites allocated in Gloucestershire's Waste Local Plan (including those in the Gloucester / Cheltenham green belt) have not been saved following a Direction from the Secretary of State (received on 5th October 2007). Whilst GCC had requested that all of its strategic and local sites (Policies 4, 5 and 6 and Chapter 4) were saved, the Secretary of State chose not to save them based on the rationale that these policies contained a reference to Best Practical Environmental Option (BPEO), a policy direction no longer favoured by Government.

At this stage, the option or combination of options that the WPA will be taking forward in relation to the green belt policy will take account of stakeholders views and any changes to Government or Regional policy. As stated earlier in this response report, the WPA will include consultation on an options stage during summer 2009 before moving toward proposed submission stages.

WPO15A:

For proposals affecting Sites of Special Scientific Interest the precautionary principle will be followed. Planning permission will not be granted for waste development which would conflict with the conservation, management and enhancement of Sites of Special Scientific Interest unless the harmful aspects can be successfully mitigated. The benefits of the development need to clearly outweigh the impact it is likely to have on the features of the site that make it of special scientific interest and/or any broader impacts on the national network of Sites of Special Scientific Interest.

WPO15B:

This option relies on national policy in PPS9 (paragraph 8) for considering proposals that may affect Sites of Special Scientific Interest. It would thus not require a separate policy in the WCS.

■ Summary of comments for the above options

WCS Options	Total representations on this option	Supported the option	Partial support for the option	Did not support the option	Those considering it to be their Preferred Option
WPO15A	19	15	1	3	9
WPO15B	19	12	4	3	9

A variety of comments were made on these two options as detailed below:

A number of respondents made the point that relying on national policy is appropriate as it is 'sufficiently robust' and there is no local need for a separate policy in the WCS.

Natural England expressed the view that a specific policy should be included in the WCS. They noted that PPS9 requires that LDFs should indicate the location of designated sites for biodiversity and stated that it was not clear how this had been achieved in the WCS? They strongly supported Paragraph 134 which supports the objectives of the Gloucestershire BAP & seeks to maximise developer contributions to Strategic Nature Areas.

The Environment Agency made the point that policy should not just seek to protect designated sites and species but should protect biodiversity in general.

Stroud District Council pointed to Circular 2006/05 as an improvement to PPS9 in terms of policy application.

Friends of the Forest expressed support for an increased consideration of the South West Biodiversity Action Plan, the South West Nature Map (and the supporting Gloucestershire Nature Map) and on wildlife corridors, blocks and the inter-linkages between designated areas e.g. in the Forest of Dean.

Woodchester Parish Council considered that WPO15A gives more protection to SSSIs than WPO15B.

■ **WPA response**

From the representations received on the two policy options for SSSIs, there is a fair degree of support for a specific policy to be included in the WCS including from Natural England. The WPA will be mindful of Government policy on ecology in the approach that it takes and in particular the revision to PPS 12 (June 2008) which requires planning authorities to carefully consider that development plan should not repeat national policies.

Section 7: Implementation

■ **Summary of section**

This section considered the delivery mechanisms for pursuing the strategy and the monitoring systems for ensuring implementation. It considers these mechanisms and systems for each of the 5 proposed strategic objectives.

■ **Summary of comments**

2 comments were received on the Implementation section of the WCS.

Government Office for the South West (GOSW) referred to general comments elsewhere on timescales and delivery.

Safety in Waste and Rubbish Disposal (SWARD) considered that under Strategic Objective A, the following paragraph should be added: 'The WPA will (with partners) press for powers to restrict the sale of non-reusable and or non-recyclable products and or packaging where recyclable alternatives exist: Manufacturers and retailers should not be able to sell products and packaging which involve a financial penalty for the WDA.' Under Strategic Objective B SWARD considered that the sentence 'with remaining residues sent to landfill/landraise' be added so as not to give the impression that any combined heat and power process just 'magics' the waste away. SWARD call for the Council and the WPA to lobby the UK Government and the European Union for waste reduction by redesign and longevity.

■ **WPA response**

The WDA agrees with the views of SWARD in relation to packaging and the production of materials that are non-reusable and or non-recyclable. This is a major issue for all Local Authorities in the UK. But unfortunately the Council currently has no powers to restrict the sale of any legal goods. These powers are only likely to be realised through central government intervention / legislation. In terms of lobbying the European Union on waste matters, this may be a matter that the Council's European Office are looking into. The WPA is not in a position at this stage where it can clearly state what option will be progressed but it is likely that the sentence 'with remaining residues sent to landfill/landraise' will be added under Objective B.

General comments including those related to specific Technical Evidence Papers

Summary of comments

26 respondents had general comments / representations on the WCS. Clearly some of these comments relate to other sections in the WCS but they are considered here in the general section due to the fact that representations may not have followed the questionnaire format. Some of the representations were detailed and lengthy.

Allstone Sand and Gravel expressed major concern at the suggestion that only a modest amount of capacity is required for the C&D waste stream. They state that the figure of 111,000 + per annum is off the mark and needs adjustment. There needs to be more discussions with waste operators who are in a difficult position, one which is likely to be made more difficult by RSS housing growth. There was a concern expressed that exempt sites are short term, diminishing and generally poorly located to waste arisings. Figures need reviewing and there needs to be flexibility in terms of allowing schemes where waste is being generated.

Bishops Cleeve Parish Council welcomed the opportunity to comment on the WCS and stated that they are opposed to any form of waste management that will prolong the life of waste sites near Bishops Cleeve – particularly the Grundons site. They support SWARD's comments rejecting incineration or thermal treatment.

Cory Environmental stated that they welcomed the WCS and agrees with the overall aims and objectives for future waste management in Gloucestershire. In relation to Paragraph 105 – Waste Disposal they accept that reliance on landfill will decrease and recycling and energy from waste increases, but they stress the need for landfill as a insurance backup and a means of treated residue disposal. There is not a clear policy statement in the WCS to this effect – a policy is needed that provides security for the WDA and local businesses and at the same time promotes better landfill development and restoration.

Cold Aston Parish Council stated that they would like to see specific provision made to deal with fly tipping. A target time for the removal of items could be published.

The Cotswolds Conservation Board outlines some of the policies in its own AONB Management Plan. They then stated that in the light of these policies they do not wish to see any expansion of existing facilities / location of new facilities other than those - as set out in their policy caveats. They are concerned about adverse effects on landscape, traffic movements and tranquillity. The Board would welcome in principle the opportunity to encourage waste reduction and recycling. They stated that it would have been helpful if the Council would have indicated its preferred option and why, having considered Issues and Options. They state that, at paragraph 124, there is confusion between nature conservation designations and landscape designations. There is also concern that the only element of the historic environment mentioned is archaeology.

The Ministry of Defence (MoD) maintained no safeguarding objections to the WCS Preferred Options, their only recommendation is that the WCS should support the implementation of the MCS – and the restoration of mineral workings situated in proximity to operational aerodromes. 'It would be appropriate for provision to be included in preferred policies WPO6A and WPO6B to facilitate such a use of inert materials for this purpose'. The MoD wished to be consulted on any site allocations documents, a particular concern being landfill and associated birdsrike issues. A further concern is the potential effects of waste management buildings in terms of safeguarding zones. The WCS should take account of the provisions of ODPM Circular 01/03, and RAF Fairford should be identified as a key material asset.

Elliott & Sons Ltd expressed concern that there was not enough provision in the WCS to deal with inert wastes. They are experiencing great difficulties in managing these wastes particularly in the central area of the county, and large quantities of C&D waste are being

taken outside the county. They dispute the assertion that only a limited additional amount of additional capacity is required. Figures are not given due to the difficulties of reconciling licensed and exempt activities, but it is stated that the text of the WCS in Para 41, Page 14 (derived from the Technical Paper on Waste Data) focuses only on the managed stream – which is not appropriate for C&D waste especially when the technical paper refers to figures of up to 0.9mt for C&D waste activities. The provision of 111,000 tpa capacity would not be sufficient provision. Exempt sites handle a large volume of the C&D waste stream , but they are short term and more difficult to secure and thus the capacity gap may grow. Whist there is reference to exempt activities continuing to support this waste stream, there is no associated supporting policy. There is an imbalance in the location of many of the exempt activities and where the C&D arises – this is unsustainable in transportation terms. Maximising C&D recycling would represent further sustainability gains by reducing the demand for primary aggregate. Elliott & Sons wish to encourage the development of as many recycling facilities as possible, and notional figures can be an obstacle. There needs to be a clear policy to maximise options for C&D wastes.

English Heritage expressed interest in the WCS in as much as it could have impacts on the historic environment. A definition of the historic environment was given. The comment was made that the stylised plans provided are too general to allow a detailed assessment of the impact of proposals, and there is a call for the Council to ensure that a thorough assessment of the impact of the preferred options on the historic environment is undertaken in line with PPG16 - Para 8, PPG15 - Para 2.4 & 3.3, PPS1 - Para 17 and MPS1 - Para 14.

Cllr Venk Sheoi - Forest of Dean District Councillor expressed the view that the strategy involving IVC will limit landfill diversion – collection systems have a major influence on cost and effectiveness – separate collection gives greater flexibility.

Mrs N. Ginn expressed the view that the Council should do more to publicise its consultations so that residents can make their views known. The use of an online questionnaire is extremely useful.

Government Office for the South West (GOSW) welcomed the progress on the WCS. They were of the view that the documents were well presented with good use of helpful diagrams, providing a general context for the development of a spatial strategy. In terms of the 'Spatial portrait of Gloucestershire' they felt there was scope to develop a more positive and specific approach to the topics that were clearly evidenced and tested through sustainability appraisal. They were of the view that the plans needed to make greater reference to other plans and strategies such as the Community Strategy and the Local Transport Plan. GOSW were clear that the strategy needed to provide a clearer and far more specific approach to the delivery of new waste facilities by identifying sites for important new strategic facilities and proposing a pattern of provision or locations for other facilities expected to be needed over the plan period. They considered the direction presented to be somewhat unclear or confusing with important aspects still needing to be clarified – including specifying by when particular facilities may be required, how and by whom they will be delivered. They stated that 'Planning for waste in the County lacks particular certainty whilst the Council has yet to decide what technology it will pursue to deal with residual waste. This would appear to be an important choice and it would be a considerable help to generate and test a realistic set of development options'. The residual procurement plan identifies five possible options for new facilities for waste recovery. In the absence of a preferred technology the WCS will need to describe how each may be delivered in the County, their relative planning merits and where new facilities would best be located. Preparation of the WCS should have regard to recent guidance which asks Waste Planning Authorities to allocate sites which are of strategic importance. The Core Strategy should allocate sites if these are central to the delivery of the strategy; such as to meet landfill diversion targets in a timely way. The broad area of search focuses on the M5 corridor as a broad location for new waste facilities. The strategy should state what facilities you would expect to be located in this area and when they need to be delivered. If you consider these facilities to be of strategic importance, and especially if they will be needed sooner rather than later, we would again strongly urge you to allocate such strategic sites as part of the Waste Core Strategy itself.

Grundon (Waste) Ltd objected to Table 3, Paragraphs 106, 107 and 109 and all the relevant supporting data in Technical Evidence Paper WCS-A Data. The quantity of voidspace referred to at Wingmoor Farm East is incorrect. The confusion may have arisen due to the changes following the combination of waste licences and their renumbering. At the 2007 base date the non-hazardous void space is 3.7 million cubic metres with a further 2.0 million cubic metres of hazardous voidspace. Grundon objects to the structure of the WCS in that it places disposal in the locational strategy chapter. They consider that a separate chapter is required for both hazardous and non-hazardous disposal as this will continue to play an important part in the management of Gloucestershire's wastes. They also state that the WCS needs to make reference to RSS Policy W1 including the need for disposal sites to meet capacity set out in Tables 1 & 2. A policy option is required relating to the landfill of all residual waste streams. This is especially important given that the WCS relies on the Wingmoor Farm East permission being renewed to its maximum capacity. If it is renewed, landfill capacity runs out in c.2020; if it is not renewed capacity runs out in 2013 and new landfills would need to be identified immediately.

Land and Mineral Management expressed concerns about the waste data in the WCS and in the data paper. In particular concern was expressed that only a limited amount of additional capacity is needed in the C&D waste stream. The provision of 111,000 tpa capacity does not address what is needed. The figures for all managed waste is given at 1.2 million tpa yet figures of 1.9 million tpa are referred to for C&D waste activities. There is an imbalance in the location of many of the exempt activities and where the C&D arises – this is unsustainable in transportation terms. Maximising C&D recycling would represent further sustainability gains by reducing the demand for primary aggregate. Policy should encourage the development of as many recycling facilities as possible, and the notional figures can be an obstacle to this if they portray that there is sufficient provision. Both the Waste Core Strategy and the Minerals Core Strategy (plus the supporting documents) are confusing, full of jargon and difficult to understand. The number of documents and the volume of paperwork is unnecessary. Land and Mineral Management question the cost to the taxpayer of producing them. They should be assisted by the use of plain English.

The Malvern Hills AONB Office submitted a response on behalf of the both the Wye Valley and the Malvern Hills AONB units. They considered that the document is well put together and clearly sets out the options proposed under each of the categories. Both AONB offices wish to continue to be involved in the process and would welcome early discussions should any additional sites be proposed within either of the AONBs.

Network Rail stated that they support the WCS in principle and would generally like to promote any initiatives to transport waste by rail. They wish to be informed of progress on the LDF.

The Highways Agency commented that their 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 of the Strategic Road Network. The policy framework needs to deliver infrastructure network improvements and where appropriate, transport management measures. The national funding programme for SRN improvements is increasingly uncertain therefore developer contributions for waste development and the Regional Funding Allocation process will be important. In the light of this the WCS must ensure that the appropriate policy framework is in place. The Agency generally welcomes the Preferred Options and broadly supports the objectives. A greater emphasis could be given to maximising opportunities for transporting waste by rail or water. Future site allocations should be assessed in terms of their impact on the SRN and in accordance with PPG13, supported by a robust evidence base. Subsequently any planning application for waste development should be accompanied by a transport assessment.

The Forest of Dean District Council stated that further consultation and dialogue was welcome especially in relation to the safeguarding of sites.

The South West Regional Assembly stated that their comments were in relation to the 'general conformity' with the RSS. They confirmed that both the Waste Core Strategy and the

Minerals Core Strategy are in general conformity with the RSS and that the evidence base behind the options presented is sound. They further stated that 'We also believe that the WCS policies comply with the apportionments in the RSS, bearing in mind that the latter present a broad direction of travel. They were of the view that the Core Strategy documents are not easy to read, with numerous references made to evidence papers. There is more scope for setting out the key findings of the work behind Core Strategies. The Core Strategies should be more consistent in setting out which of the options presented are being preferred. The documents would hence benefit from setting out clearly which option is the preferred one and which options will not be pursued and why. They stated that 'we believe it would be entirely appropriate to identify strategic sites for management facilities in order to meet the capacity requirements and to move forward in diverting waste from landfill'. They backed this up by reference to draft RSS Para 7.4.6 and government waste policy in PPS10. They support options that provide for a site specific allocation in the County to meet the indicative annual capacities set out in Annex C of the draft RSS. In terms of the WCS evidence base the RPB comments that this '...represents an up-to-date and authoritative assessment of current needs that supersedes research completed for the RSS. We find that the suggested capacity requirements in the evidence base and preferred options paper to be in general conformity with the ambitions of the draft RSS. The County should move forward rapidly with the allocation of site/s required to meet the identified shortfall, this may include the allocation of strategic sites in the Core Strategy, in particular where these are required to ensure the County meets its statutory obligations for municipal waste diversion'. The RPB agreed that I scale sites may be better approached through criteria based policies.

Mr Paul Savage expressed the view opposing incineration as a solution to Gloucestershire's waste disposal needs. His main reasons cited were related to emissions produced, atmospheric inversions and demand for waste and associated truck movements. The wellbeing of local communities must be taken in to account and decisions should not be taken for reasons of expediency.

Cheltenham Borough Council welcomed the approach and layout of the WCS stating that e.g. the Context section was generally useful and informative. However further comments were made seeking clarification as to how the Minerals and Waste Development Framework fits in with the Local Development Frameworks and which document s will form the statutory development plan with respect to minerals and waste applications. In terms of the spatial strategy, the principle of dealing with strategic sites separately from local sites is supported.

Stroud District Council supported the retention of the existing WLP policy on the disposal of sludge. They also supported the Appendix B figures referred to in Paragraph 54. (Note: further detailed comments on the WCS were provided by Stroud under the questionnaire headings).

Sunhill Action Group expressed the strong view that the planning authority must find ways to limit the expansion of identified waste sites. They were clear that the waste planning authority should distance themselves from waste companies and that these companies should not have any input into the consultation process or influence planning policy. They expressed the view that: 'These waste companies work against us all, communities, councillors and planning officers alike'.

Safety in Waste and Rubbish Disposal (SWARD) stated that they appreciated the depth of analysis and the amount of work that had gone into the document. They fully endorsed the paragraphs on community development concerning the fact that proposed waste facilities engender local opposition and thus there is a need for the fostering of communal ownership. They stated that much a the waste that ends up in Bishops Cleeve comes from outside of Gloucestershire and the hazardous waste needs very careful management. They stated that they had lost confidence in the management of the [Wingmoor Farm] sites as a result of EA warnings to the operators and incidents where e.g. there were phenol releases. SWARD states that the motivation behind the Strategy is very laudable but they consider that there are influences outside the Council's control that are disadvantageous. They consider that that the strategy deals more with the results of waste rather than prevention. In terms of Page 8, Para 19, the term "making the best use of that [waste] produced" SWARD took to mean: 'everything

that can be recycled will be recycled, either segregated at the kerbside or extracted from the feedstock for treatment by incinerator / MBT / AD etc. SWARD requested clarification over the word 'realistically' in terms of its use in the phrase 'waste that cannot realistically be reused or recycled'. Concern was expressed that if communities are to take responsibility for the waste that they produce, then sites must be found closer to the places where waste arises. SWARD stated that a residual waste facility for each settlement would have the effect of raising opposition and awareness and personal action would follow reducing the levels of waste that are produced. Comments were also made on the Council's supplementary planning document on waste minimisation – that the principles behind it should be extended to other waste generating activities and the Council should be proactive in pressing for these principles to be implemented. SWARD questioned the waste growth figures in Para 41, Page 35, stating that they should be considered again. In terms of Para 107, Page 35 SWARD consider that it is good to husband voidspace but that this is best done by more recycling and more waste reduction by redesign i.e. zero waste. In terms of their comments in relation to Appendix A SWARD wanted a definition of 'Autoclaving', 'Joint Municipal Waste Management Strategy', 'Regional Waste Strategy' and 'Residual Waste'. They were also of the view that the term 'Restoration' should be moved to appear before 'Re-use'.

The Environment Agency welcomed the fact that the Strategic Flood Risk Assessment (SFRA) was being undertaken, but they were of the view that it would have been useful to have an indication of how flood risk may influence strategic waste matters. They comment that the lack of a flood risk policy in the Submission Core Strategy would result in an objection from the EA and a likelihood of the document being found unsound. The SFRA should not be an 'add-on' process throughout the document. In terms of other issues relating to the water environment, the EA comment that water quality and water resources are also relevant and waste provision in Gloucestershire should show due consideration of these issues.

The Living Green Centre provided a fairly lengthy representation with a number of suggestions relating not only to waste planning but also to waste collection and disposal. They saw the need for a climate change risk factor in deciding on sites for waste management, and the mapping of air flows and areas at particular risk down wind of incinerators. They also called for consistency in terms of waste policy and collection across the Districts in Gloucestershire – with some variation for rural and urban areas. They also called for a harmonisation of domestic and commercial / business waste collection. They were concerned about the hazardous nature of some household wastes such as batteries, garden chemicals and household cleaning products and considered that methods should be employed e.g. at community collection points for the their safe collection and management.

West Gloucestershire Green Party expressed the view that the strategy was flawed as it had not been adequately consulted upon. They called for an extension to the consultation process 'to ensure that residents throughout Gloucestershire are properly consulted'.

■ WPA response

The detailed comments from GOSW and the SWRA point to the fact that strategic sites for the treatment of residual MSW should be included in the WCS and this has had, and will continue to have, major implications for the progress and format of the WCS as a DPD. This view was also echoed by the South West Regional Assembly (SWRA) as the Regional Planning Body (RPB). These representations accord with the County Council's view that reducing levels of waste that go to landfill and avoiding heavy Landfill Allowance Trading Scheme (LATS) fines is a high priority. Thus the next stage of the WCS will be technical appraisal, stakeholder involvement and consultation on options for strategic sites for managing municipal waste. It should be noted that revised PPS 12 (June 2008) and new development plan regulations have amended the requirements for the original Issues & Options & Preferred Options consultation. This is now replaced with ongoing consultation and generation of options (new regulation 25. Once these stages have been undertaken, the WCS will now progress with a Proposed Submission stage including strategic sites. In this process the stakeholder's comments, as detailed in this report, will be appropriately considered and reflected as the WCS moves towards submission to the Secretary of State. The new programme for WCS and other DPD preparation is outlined in the latest revision of the Minerals & Waste Development Scheme. In broad terms this will include consultation on

strategic site options during summer 2009 before moving toward proposed submission stages. In addition the WPA welcomes the positive comments from the SWRA as RPB in respect of the confirmation of general conformity with the RSS, the up-to-date data and 'sound' evidence base.

The WPA is in agreement with much of SWARD's comments, in particular the need for increased efforts to reduce waste by design and extend the principles of waste minimisation across all the waste streams. However in their words '*...influences outside the Council's control that are disadvantageous*' have to be borne in mind.

Friends of the Earth Gloucestershire Network's detailed comments (which are available in full in Appendix A) have been addressed to some extent elsewhere within this sections of this report. They have also been considered by the WDA team at the County Council, as much of the representation related to MSW data and proposals for a residual treatment facilities (or facilities) in the County. General concerns expressed by C&D / C&I operators such as Allstone Sand and Gravel, and Elliot & Sons Ltd as well as Consultants - Land & Mineral Management have been considered in the WPA's response to questions over data and capacity issues in the Spatial Portrait section of this report. Therefore please refer to the discussion on data issues contained in section 2 of this report. The use of jargon and plain English was at the forefront of the WCS, Preferred Options papers. In deed some respondents such as GOSW praised the approach used in the WCS. More detailed technical evidence papers were then used to support the main reports

Comments rejecting, or expressing concern over, Energy from Waste/incineration as a technology e.g. from Bishop's Cleeve Parish Council, Mr Paul Savage and SWARD are essentially matters for the WDA and their residual strategy. As yet the County Council as WDA has not made a definite decision on an appropriate technology for Gloucestershire and its bid for PFI Credits has not yet been considered by DEFRA.

In relation to Cory Environmental's view that there is a continued need for landfill as an insurance backup and a policy statement to that effect is needed in the WCS, this will be considered and addressed in the next round of WCS 'Options'. However it should be noted that the WCS, whilst seeking to move waste away from landfill, does seek to husband landfill void and further details are provided in Section 8 of Technical Evidence Paper WCS-A Data. At present the data suggests a potentially adequate supply of landfill capacity for the medium term and potentially longer subject to a number of issues, including the efforts to divert waste from landfill. These issues are highlighted in the technical paper WCS –A 'Waste Data'. Clearly this is an issue which the WPA need to monitor closely and at some stage consideration of additional landfill maybe required in the future. However the data situation at the moment does not suggest that any specific additional landfill allocation is required now. The WCS will need to provide the context to how and when this issue might be addressed, possibly through future reviews of the WCS or through another DPD. In addition the WPA are certainly committed to improved landfill restoration, and the WCS will need to provide some context to any proposals on this nature which may come forward through the life span of the WCS.

Cold Aston Parish Council's concerns about fly tipping are noted. The WPA along with the WDA and the Environment Agency (who hold the principal data set '*Flycapture*') are fully aware of the significance of this issue and the potential for the situation to worsen depending on various policy directions e.g. charging for domestic collection and increases in landfill tax etc.

The Cotswolds Conservation Board's comment that it would have been useful for the Council to clearly indicate which options were preferred will certainly be addressed at the next stage of consultation following the proposed Issues and Options stage on strategic waste sites. In relation to their point about the 'confusion between nature conservation designations and landscape designations' at Para 124, the WPA is aware of the distinction between the two, but in terms of land use designations (the heading used in the text), Ramsar sites, SPAs and SACs are at the top of the hierarchy being protected by law.

The Ministry of Defence's comments are welcomed and noted and they will be consulted (as requested) on any waste sites work.

English Heritage were concerned that the potential impacts of the DPD options on the historic environment should have been undertaken in line with PPG15 and PPG16. The WPA considers that this has been included in the document, and through the Sustainability Appraisal.

Cllr Venk Sheno's comments on IVC, potentially limiting landfill diversion are noted.

Grundon (Waste) Ltd's objections to Table 3, Paragraphs 106,107 and 109 and the supporting data in Technical Evidence Paper WCS-A have been addressed in this report under Section 2. The WPA will update all of the landfill voidspace data (as provided by the EA) prior to the next stage of WCS Options consultation. For the sake of transparency, individual site voidspace figures will be provided.

The WPA will continue to involve the Malvern Hills AONB Office (along with the Wye Valley AONB office) in the process as requested.

The WPA will continue to inform Network Rail on the progress of the MWDF, as requested.

The WPA welcomes the Highways Agency's broad support for the Preferred options and the objectives. In the forthcoming sites work the Agencies comments are noted with respect to the potential impacts of site allocations on the SRN.

The comments from the South West Regional Assembly as the Regional Planning Body are welcomed, particularly in respect of the general conformity with the RSS and the 'sound evidence base'. In terms of their consideration of the appropriateness of allocating strategic waste sites in the WCS, this is a matter which the WPA are considering in discussion with GOSW and the latest position is outlined elsewhere in this response report.

Cheltenham Borough Council's positive comments are welcomed and their support for the principle of dealing with strategic sites separately from local sites is noted.

Stroud District Council's comments on support for the retention of the existing WLP policy on the disposal of sludge is noted.

The views of Sunhill Action Group that the WPA should distance themselves from waste companies and that these companies should not have any influence into the consultation process are not accepted as they are contrary to PPS10 Para 3: 'reflect the concerns and interests of communities, the needs of waste collection authorities, waste disposal authorities and business, and encourage competitiveness.' It is clear that the WPA will have to engage with waste companies in the preparation of the WCS to ensure deliverability of proposals can be demonstrated.

The comments from the Environment Agency regarding SFRA are noted and will be addressed through the ongoing Core Strategy preparation process.

In relation to the Living Green Centre's comments on the need for a climate change risk factor and the mapping of air flows and areas at risk from incineration these are matters that would be covered by the Sustainability Appraisal (in relation to climate change) and through various technical environmental assessments for sites. The WPA is in agreement with the respondents in terms of their comments about the need for 'consistency in terms of waste policy and collection across the Districts in Gloucestershire'. It may be that the main obstacle to this is the current two-tier system of local government in Gloucestershire. The harmonisation of domestic and commercial / business waste collection is currently difficult due to the specific definition of Municipal waste, although it is clear that some business waste is collected by the Districts in their capacity as Waste Collection Authorities.

West Gloucestershire Green Party's comments about the inadequacy of consultation are not accepted by the WPA. Over 1400 stakeholders were consulted on the WCS Preferred Options consultation, and the Issues and Options consultation prior to that. Additionally press releases, newspaper adverts, forums and a series of newsletters have kept the public informed from the outset.

Comments on the Sustainability Appraisal (SA) Report and Appropriate Assessment (AA) Report

■ Summary of comments

7 written comments were received relating to the SA Report and or the AA Report. 2 comments were broadly supportive 'agreeing' with the conclusions of the SA and considering it to be 'comprehensive and informative'. One stakeholder indicated that it was not adequately focused on certain issues e.g. matters raised within the South West Biodiversity Action Plan, the South West Nature Map (and the supporting Gloucestershire Nature Map) and on wildlife corridors and the inter-linkages between designated areas e.g. in the Forest of Dean.

Grundon Waste Ltd expressed the view that both the Core Strategy document itself and the accompanying SA Report had not considered the sustainability or viability of the existing permitted landfill voidspace in the county. The issue of whether or not there should be a landfill policy had not raised in the Preferred options or tested through the SA.

The Environment Agency (A statutory consultee for SA) had no specific comments to make on the SA other than to suggest that once the Strategic Flood Risk Assessment (SFRA) was complete that the SA should be updated to reflect this.

Natural England (A statutory consultee for SA) submitted the most lengthy comments. In relation to the Appropriate Assessment Report they agreed with the assessment but queried the test of Options WPO4b, c, and d in terms of whether sites outside of the Severn Vale could be affected. For Options WPO6a and b they considered that the assessment of the effects on European sites should be considered 'uncertain'. A comment was made that, due to the fact that differences between Options WPO10a and b were not obvious it was not clear why WPO10a could have an impact on the Severn Estuary whilst WPOb was considered not to have a potential impact.

In relation to the SA Report Natural England commented on the fact that the Severn Estuary is now also a Candidate Special Area of Conservation (SAC). In terms of the monitoring proposals it was suggested that additional / alternative indicators and targets be used to measure impacts on SSSIs. For Options WPOb-d, WPO7b-d and WPO8a it was suggested that effects on biodiversity should be given an 'uncertain' score.

■ WPA response

The positive comments are welcomed and the fact that the statutory consultees (the EA and NE) have no serious issues with both the SA Report and the AA Report is also welcomed. As indicated by the GOSW response the SA is part of the process of assessment of options. There is other technical evidence/data which the SA flags up throughout the reports. The points raised by Natural England can and will be addressed in future stages of the WCS process. The points raised about the designations in the Forest of Dean are valid but as this is a core strategy dealing with very broad strategic issues they will be better and more appropriately addressed in any consideration of sites – through sites work, or through a waste sites DPD where environmental / landscape designations and important linkages between these areas will be considered.

Grundon's comments on landfill have been addressed through the WPA response to matters raised in Section 2 of this report.

Appendix 1: Representation from Gloucestershire Friends of the Earth Network on the Waste Core Strategy Preferred Options

1. Introduction:

- 1.1 This submission is made on behalf of Gloucestershire Friends of the Earth.
- 1.2 The key concerns in relation to the current proposals include:
 - The reliability of the data upon which the plan is based – particularly for commercial and industrial wastes
 - The unambitious nature of the timescales and targets for recycling and waste reduction
 - The Waste Growth and data Assumptions.
 - The projected requirements for ‘Strategic’ facilities and the implicit emphasis on large-scale sites rather than local waste management.
 - The failure of the siting process to ensure that any large facilities are sustainable, in relation, for example to the provision of combined heat and power

The reliability of the Data upon which the DPD is based:

- 1.3 The DPD is effectively driven by the waste data as this provides the impetus for the provision and the possible scale of new facilities.
- 1.4 Although C&D waste is apparently large it varies significantly from year to year and the existing capacity within the Gloucestershire is 25% larger than the arisings. No new capacity is likely to be required and some of the existing capacity may even be available for other related MSW and C&I waste streams as under utilised capacity is likely to be attracting waste imports into the county.
- 1.5 Hazardous waste arisings are assessed as 72,000 tonnes in 2004. This figure is subject to significant uncertainty but treatment was available for 38,000 tonnes c 53% in 2004 and much more capacity has since been approved. The assessed hazardous waste landfill voidspace in the County would last for 103 years based on the residual wastes being landfilled at a density of just 1 tonne/m³. The hazardous waste treatment market is, in any case, rather specialist and both generation and treatment are largely price driven.
- 1.6 The and most controversial aspects of the data are therefore:

Waste Stream	Base Year*	Total (thousand tonnes)
MSW	2006/07	324
C&I (including metals)	2005	462

- 1.7 There is no doubt that the statistics for the MSW element are significantly more robust than for the commercial and industrial wastes.
- 1.8 Table 2 of the WCS Preferred Options reports shows the capacity available as of September 2007 to deal with these wastes.
- 1.9 This table has been redrawn in a clearer format and so that the totals of the relevant capacity can be seen more clearly

Waste Facility	MSW Capacity	C&I Capacity	Total Capacity
Windrow Composting	69	10	79
In Vessel Composting	60	48	108
Household Recycling Centres	81		81
C&I Re-use/Recycling		161	161
C&I Recovery/Treatment (including transfer)		160	160
Metal Recycling Sites		261	261
Totals	210	640	850

1.10 It is apparent from this table that the commercial waste treatment capacity is very much greater than the arisings and, assuming the figures on which the table in the DPD is based are robust, then the County has already achieved the 2020 targets in the emerging RSS. The plan should clarify the breakdown of the 160,000 tpa transfer/ recovery capacity, but even in the extremely unlikely case that this was all transfer capacity then the commercial waste treatment capacity would still significantly exceed arisings.

1.11 A significant proportion (41%) of the capacity is for metal recycling and it would be helpful if this was better matched to local arisings by providing a more detailed breakdown and waste analysis of the commercial/ industrial waste arisings from Gloucestershire.

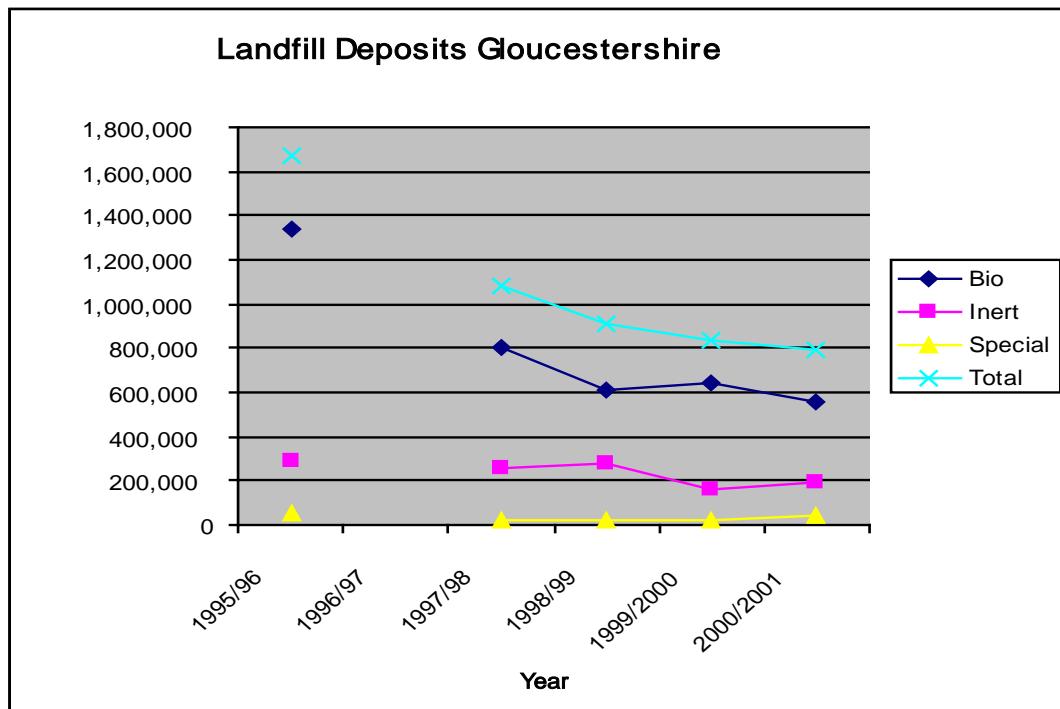
1.12 Technical Paper WCS-A says that as there are 267 kt of biodegradable C&I waste landfilled each year “the assumed overprovision is clearly not accurate”. This does not follow. Commercial and industrial waste generation, treatment and disposal is extremely price sensitive and if landfill is cheaper than treatment then that will be the preferred disposal route. As a result of this it is very likely that there will be a major fall in the arisings when landfill tax rises to £ 48/tonne by 2010.

1.13 The consequence of the excess capacity is that there may currently be under utilised capacity which could be made available for MSW treatment. At the moment, however, it is more likely that those commercial/ industrial wastes with higher recovery value or higher disposal charges are being imported into the county whilst locally generated wastes are being landfilled. This will certainly change as prices rise and as transport becomes more expensive and thus represents a higher proportion of the treatment/disposal costs.

1.14 It is also not realistic to assume, as the DPD does, that there will be no change in arisings in the face of such large increases in disposal taxes. By 2010 it is clear that practically all treatment (apart from perhaps new thermal capacity, see below) will be cheaper than landfill disposal. In these circumstances market forces will ensure that there is little or no residual landfill demand for commercial and industrial wastes.

1.15 If the C & I wastes (for disposal at least) are estimated from subtracting the MSW levels from non-inert landfill disposal then it can be seen that since 1997/98 the C & I waste stream fell from 571,858 tonnes to 406,897 tonnes in 1999/2000. The disposal rate further reduced to 338,301 tonnes in 2001/2 i.e. c 41% reduction since 1997/98.

1.16 This is one of the main reasons for the dramatic reduction of landfill disposal in the county in the late 90's (1996/97 data was not available):



1.17 It is difficult to understand why the plan has been based on the premise that there will be no further reduction in commercial and industrial wastes arisings at a time when disposal costs are rising at a much faster rate than at any time particularly in the past in the light of these recent dramatic falls in arisings.

1.18 It appears that the total existing treatment capacity actually exceeds the claimed combined MSW and C&I arisings of 786,000 tonnes. There is no reason in principle subject to contractual arrangements why some or all of the surplus commercial/industrial waste treatment capacity should not be available for the relevant part of the municipal waste stream. This should be investigated further as the consequence would clearly be to reduce the need for new treatment facilities. This is the approach adopted in relation to landfill and WCSA says:

223. For the purposes of making provision for landfill voidspace it is considered prudent to combine the non-hazardous biodegradable and inert MSW and C&I requirements. This is because the two types of waste have a comparable composition, similar site requirements and therefore, unsurprisingly, are currently taken to the same sites in the County.

1.19 This is largely true for treatment as well – indeed MSW contains a proportion of commercial waste (about 8-10,000 tpa).

1.20 It is not sensible for the DPD to plan for over-provision of capacity as that would tend to depress prices within Gloucestershire and undermine pressures like the landfill tax which is intended to drive wastes up the waste hierarchy. Lower local prices would also promote longer term, and environmentally unsustainable, long distance imports of waste into the Gloucestershire.

1.21 Even with the evident over-capacity discussed above there remain doubts that the capacities presented in Table 2 of the WCS Preferred options report fully reflects the current situation. The sites that have been included in the assessment should be listed in order that the changes following new permissions or other changes can easily and transparently be made.

1.22 At present they apparently do not, for example, include sites which have either been given planning permission but have not yet come into operation or are in the planning system and are consistent with the existing Development Plan criteria. This would include the 48 kpta IVC facility at Sharpness and the proposed 160,000 tpa Cory MBT facility at Wingmoor.

1.23 It is unclear from the data presentation which other facilities are omitted. I note, for example, that Gloucestershire as the Waste Planning Authority made 32 Waste planning decisions in 2006/7 and Granted 25 of these. A total of 91 applications have been made in the past three years of which 79 were approved. This is a three fold annual increase compared with the number of applications made in 2001/2. There is no indication in the DPD what contribution these additional facilities are likely to make but it is clear that some of them, like the Cory MBT facility, are very large and would have a very significant impact on the outcomes and projections within the plan.

1.24 In Gloucestershire recent planning applications and planning permissions for in composting facilities would remove from the wet biodegradable residual waste stream more than 120,000 tons per annum (tpa) :

- 25,000tpa initially increasing to 48,000 tpa by Bioganix at Sharpness, Stroud District,
- 32000 tpa at Wingmoor Farm, Tewkesbury District (S106 to be agreed)
- 25,000 tpa at Dymock, Forest of Dean
- 22,000 tpa at Sunhill Farm, Cotswolds (subject to planning).

1.25 It is frustrating that these cannot be compared with Table 2 as the DPD is currently drafted.

1.26 It is also clear from the large number of (successful) applications that the market is already gearing up to meet the increased demands for waste management facilities. Caution should be made against over-provision in these circumstances.

1.27 *PPS 10, paragraph 25 says:*

In the case of waste disposal facilities, applicants should be able to demonstrate that the envisaged facility will not undermine the waste planning strategy through prejudicing movement up the waste hierarchy.

1.28 *PPS 10 similarly warns, at paragraph 4, against over-provision of disposal options where*

these would undermine movement up the waste hierarchy.

Timescales and targets for recycling and waste reduction:

- 1.29 Considering first – as they are supposed to be the highest priority in the hierarchy - the targets for waste reduction.
- 1.30 The DPD suggests that MSW has been growing at 3% per annum over recent years and projects that it will grow at 1.6% until 2020 when the aspiration is to reduce the waste growth to zero.
- 1.31 It is important first to consider the actual growth in the recent past. When the full, monthly, data from the WDA is plotted on an annual basis the results are:

	January	February	March	April	May	June	July	August	September	October	November	December	Total
2002				24,977	25,405	23,158	25,701	25,493	23,521	24,843	22,178	20,158	215,435
2003	24,660	19,864	23,535	25,352	26,495	25,675	26,438	25,788	24,723	24,801	21,770	21,522	290,621
2004	24,435	21,096	23,884	28,595	27,729	28,075	27,342	26,935	27,954	24,865	24,952	21,677	307,539
2005	24,710	20,649	26,003	27,637	28,686	29,507	26,679	27,794	26,638	25,083	24,046	21,711	309,143
2006	25,508	20,807	23,225	27,761	29,854	30,183	26,867	28,446	27,721	27,323	25,568	21,228	314,491
2007	26,989	21,861	25,522	29,027	28,837	28,186	27,715	31,277	26,400	23,935	24,766	20,077	314,592

- 1.32 These data are based on total household wastes, including those from CA sites, but exclude the commercial waste collected by the WDA. This is because the commercial wastes are essentially arbitrary and discretionary. They will fluctuate with price and thus distort the long-term trends for the wastes that the authority has an obligation to collect. Trade waste has, in any case, fallen from about 8,500 tonnes in 2002/3 to c.5,700 tonnes in 2006/7 and so would tend to reduce the apparent growth rate.
- 1.33 The table shows the following waste growth based on these total household and CA site arisings:

Year	Growth
2002	
2003	3.3%
2004	5.8%
2005	0.5%
2006	1.7%
2007	0.0%
2008	

- 1.34 Note that the increase from 2002 to 2003 is based on the eight months from April to December in each case. It can be seen that the waste growth from 2006 to 2007 was actually at the 2020 target – assuming a 3% - or even a 1.6% growth, in the DPD simply does not reflect the real data.
- 1.35 Since 2004 the average annual growth has been just 0.8%.
- 1.36 The results appear slightly differently when presented on the financial year basis:

	2002-3	2003-4	2004-5	2005-06	2006-7	Average
WCA Municipal Waste	211,989	206,396	207,870	189,519	180,458	
Annual growth		-2.64%	0.71%	-8.83%	-4.78%	-3.88%
Recyclables (via Districts)						
Green	2,401	6,426	9,921	20,407	28,951	
Dry Recyclables	26,972	32,354	36,162	39,873	42,543	
Total Recyclables	29,373	38,780	46,083	60,280	71,494	
Annual growth		32.03%	18.83%	30.81%	18.60%	25.07%
Household Recycling Centres						
Recyclables	5,698	7,739	10,967	13,062	12,601	
Green Waste	9,995	11,030	12,853	11,869	12,652	
Residual Waste	23,813	22,119	20,543	18,936	29,690	
DIY/Hardcore	2,359	5,480	10,586	12,870	11,232	
Total	41,865	46,368	54,949	56,737	66,175	
3rd Party Recyclables	267	434	585	785	1196	
TOTAL ARISINGS	283,493	291,978	309,486	307,322	319,323	
Annual growth		2.99%	6.00%	-0.70%	3.91%	3.05%
Subtract Greenwaste	281,093	285,552	299,565	286,914	290,372	
Annual growth		1.59%	4.91%	-4.22%	1.21%	0.87%
Subtract Hardcore	278,733	280,072	288,979	274,044	279,140	
Annual growth		0.48%	3.18%	-5.17%	1.86%	0.09%

1.37 These data show, in particular, the high growth in 'green' waste which, being readily compostable, has often been collected in an attempt to present improved 'Best Value' figures for composting/recycling. As the performance indicators did not place weight on the total arisings the corresponding growth in waste was largely ignored.

1.38 This has not been a particularly sensible approach to waste management and, as the green waste is practically all "new" waste which would previously have been left in gardens or composted at home. It should not be used as a basis to project overall growth rates. When green waste is removed it can be seen that over the period from 2002-3 reduces to just 0.87% - much closer to the national average of c. 0.5% indicated in Waste Strategy 2007.

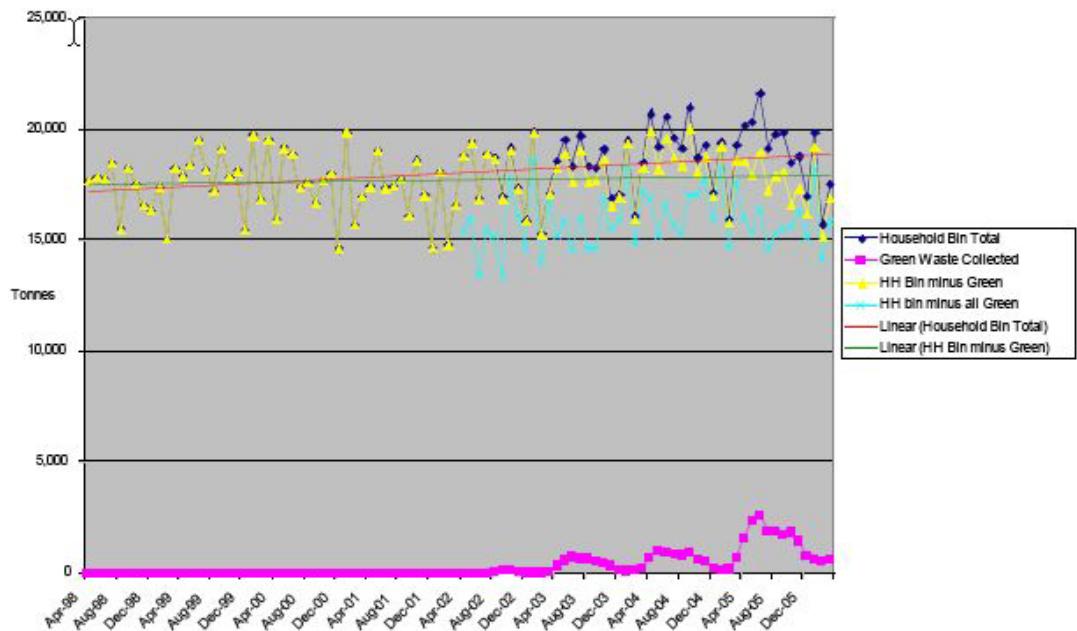
1.39 The increased emphasis on collection of DIY/hardcore wastes at HRCs has also almost certainly generated mainly 'new'. Hardcore would rarely have been put out with residual domestic waste and, if produced and disposed of at all, would mainly have been collected in skips and would then most likely have been recycled as part of the C&D stream. If hardcore waste growth is removed from the equation then it can be seen that the average growth rate since 2002 is only 0.09%.

1.40 The majority of the increase in arisings has also come from HRCs. The experience in many parts of the country has been that the landfill tax and compounded increases in disposal costs has resulted in some 'bleeding' of trade wastes into the domestic stream as a result of the landfill tax. This includes small traders bringing waste home and leaving their trade waste with their household waste for collection; an increase in waste from the larger numbers of self employed or other full or part-time home workers; traders using Civic amenity sites or tradesmen leaving waste behind on domestic contracts which would previously have been removed. If this is happening in Gloucestershire, as seems likely, then the implication would be that the total household waste is actually decreasing.

1.41 The generation of new green waste, as described above, is essentially what Eunomia found in their review for the Authority in 2006 (Eunomia Research & Consulting 2006). The light blue lines on the chart below show the waste with green waste removed. Eunomia obviously did not, at that time, have the benefit of the more recent data for the County:

5.1.1 Bin Waste

Figure 1. Gloucestershire Bin Waste Arisings By Month



1.42 The difference between these assumptions and those in the DPD are large and the impacts are highly significant for much of the future need and strategy.

1.43 The assessment upon which the growth rates in the plan are based does not take into account the increased environmental imperatives which follow from the recognition that climate change is real and requires urgent action; it ignores the huge increases in disposal and treatment costs, which, even though not directly passed to the residents – will have major impacts on the incentives for authorities to promote waste reduction – such as home composting. The higher costs will justify much more significant investment than has historically been the case. It also ignores technological changes. These are inevitable – think, for example, of the demise of video tape and CDs – now largely replaced with almost waste free digital media or the downsizing and dematerialisation of electronic equipment. Also not considered are the increased impacts of extended producer responsibility legislation which not only mandates recovery but provides a powerful incentive for manufacturers to de-materialise their products.

1.44 A more appropriate approach for the DPD is to make assumptions zero growth as there is absolutely no evidence that supports an argument that municipal/ household waste arisings in Gloucestershire are growing. Sensitivity bands through to $\pm 1\%$ could be included to ensure a robust outcome.

1.45 It is of some concern not all the relevant waste data and projections are in the public domain – particularly the revisions to landfill capacity assessment and the growth rates used to support the Outline business case of the PFI.

Recycling Targets:

1.46 Whilst the targets set in the plan for recycling would have been considered ambitious only five years ago they must now be seen as moderate in the context of the demonstrated recycling rates in parts of Europe. Flanders, for example, currently achieves over 70% recycling (Fogarty, Reid et al. 2008).

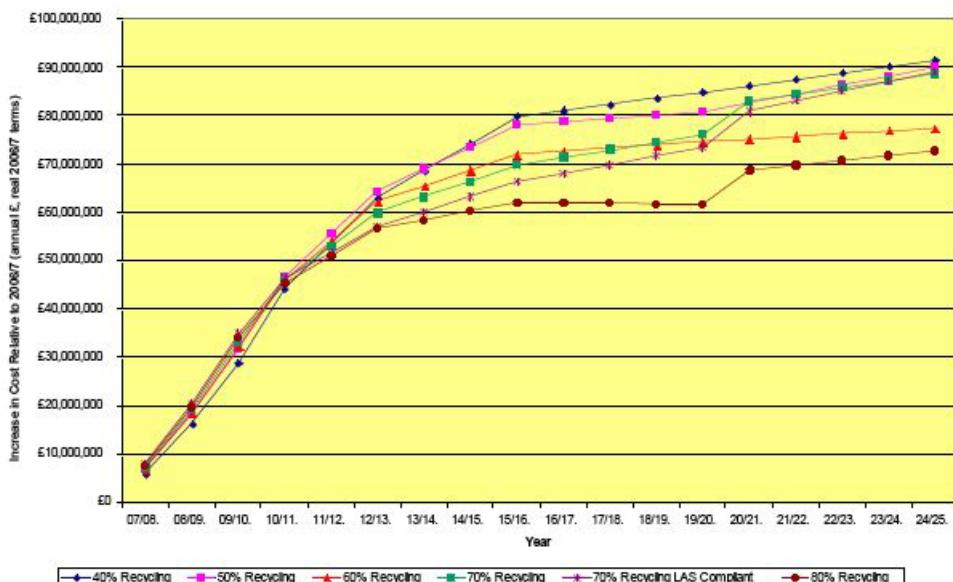
1.47 Scotland has recently set new recycling targets exceeding 70% for recycling and Wales is likely to follow with similar targets:

Table 6 – Summary of preferred new targets

TARGET FOR:	TARGETS FOR EACH TARGET YEAR				
	09/10	12/13	15/16	19/20	24/25
Minimum levels of recycling / composting (or AD)	40%	52%	58%	64%	70%
Minimum levels of composting (or AD) of source separated food waste from kitchens as part of the combined recycling/composting target above	-	15.0%	15.0%	15.0%	15.0%
Maximum level of energy from waste	-	-	-	30%	30%
Maximum level of landfill	-	-	-	10%	5%
Maximum level of residual household waste per inhabitant per annum	-	-	-	-	150 kg
Note – specific composting targets for green waste have been dropped as they have the potential to encourage the collection of green waste that would not normally have been put out for collection by householders. Food waste composting/AD targets increase non-linearly in order to help make a substantial contribution towards meeting the 2012/13 and 2019/20 Landfill Directive targets.					

1.48 The work for the National Assembly for Wales was by the Counties technical consultants, Eunomia (National Assembly for Wales 2007) and showed that the materials that could be recycled make up 93.3% of the municipal waste stream. Crucially recycling 80% was calculated to be cheaper than recycling 60%:

Figure 3: Evolution in Annual Increases in Cost Relative to 2006/7 (annual increase in real £ 2006/7)



1.49 In these circumstances it is very likely that the recycling rates in the plan will need to be revised – there is no reason why there should be higher targets just across the border in Wales than in Gloucestershire.

Landfill Capacity:

1.50 It is not clear how the data for landfill voidspace in the DPD has been established.

1.51 The DPD confirms that the Environment Agency website state that Gloucestershire has 20 years of landfill capacity remaining as at 31/3/05 (based on a remaining voidspace of 15 million m³ for non-inert waste). It also says that “The Environment Agency have advised that these four landfill sites have (at Feb 2007) a combined voidspace capacity of around 8,985,000m³ for non-hazardous waste.” The obvious approach would have been to ask the Environment Agency, upon whose data the voidspace figures depend, to reconcile the differences. If this has been done then where is the explanation? If it has not been done then why not?

1.52 There was a similar issue at the previous waste local plan public inquiry. The County evidence on need presented a case in which there was an under reporting of available (and licensed) void space of the order of 9 million cubic metres. This related, I understand to a single landfill site (Wingmoor East) the capacity of which had been recorded as the engineered area and not the total licensed area.

1.53 The 2004 Gloucestershire Waste Local Plan (Gloucestershire County Council 2004) corrected this and says, in relation to landfill void:

LANDFILL POSITION

3.22 Currently it is estimated that over 17 million cubic metres of permitted and licensed landfill and landraising void space exists in Gloucestershire. In 2002 operators are required to declare the void space to be devoted to hazardous or non-hazardous waste. The Environment Agency estimates that 13 million cubic metres could be assigned to non-hazardous, which includes municipal waste.

1.54 It seems exceedingly unlikely that the difference between the DPD and the WLP (representing about 6 million m³ of landfill capacity has been filled in the past two years. Gloucestershire County Council proof WPA 1 indicated that the County was aware of the potential reporting errors in the data :

“Figures quoted in the amended section 3.19 (WLP) are for the licensed void space allowed for landfill according to the information provided by Environment Agency records. This may not represent the complete void space that could potentially be available. It is possible that waste contractors operating sites within the County have not declared the full extent of their potential landfill capacity and as such there is likely to be more than adequate landfill space within the County even at current input rates”

1.55 It would appear that the same issues may have arisen again. Clearly this is an important issue – not least because it affects the landfill capacity available, for example, for disposal of MBT residues. It urgently needs to be resolved because it seems likely that the County, with the already planned 160,000 tonnes per annum of MBT capacity would be able to deal with all the residual wastes with no additional major facilities being needed. Residues from such a facility should be able to be landfilled at 1.5 tonnes/m³ with levels of biological activity little different from soil.

The projected requirements for ‘Strategic’ facilities:

1.56 It is unclear why the plan considers that there is any further need for residual treatment facilities in the light of the above. Other facilities needed for treatment, again if needed – and any need is likely to be much less than currently suggested, 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.

The failure of the siting process to ensure that any large facilities are sustainable:

1.57 It is frustrating to observe that in spite of the existing capacity the County seems determined to attempt to develop thermal treatment options at Javelin Park.

1.58 This site seems poorly suited to the need for combined heat and power which is necessary to make the site at all efficient in climate change terms. This is clearly an important planning consideration (Communities and Local Government 2007).

1.59 Furthermore the Waste Incineration Directive (European Commission 2000) says:

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.

1.60 These requirements can only be secured at the planning stage and should be addressed in the DP.

1.61 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:

1.62 Without CHP any application must be very much weaker than would otherwise be the case. The reason is again demonstrated by the Counties consultants ((Hogg and Eunomia Research & Consulting Ltd 2006; ENDS 2008)):

CARBON COST OF RESIDUAL WASTE TREATMENT	
	£ per tonne of waste
MBT with anaerobic digestion generating heat and electricity	6.01
Autoclaving, followed by gasification	8.38
MBT producing stabilised output for landfill	9.55
Incineration with CHP	10.21
MBT producing RDF for gasification	10.71
MBT producing RDF for incineration	10.97
Incineration generating electricity only	11.45
Landfill	31.90

1.63 Showing the high carbon costs associated with thermal treatment compared with the options described above of MBT with stabilized output to landfill for residual wastes in the county after the higher recycling rates proposed.

1.64 This conclusion is supported by a large body of literature showing that the external costs of thermal treatment are actually very similar to those for landfill. Studies finding similar results include, but are certainly not limited to:

1. Eunomia, A Changing Climate for Energy from Waste?, Final report for Friends of the Earth, 03/05/2006. (Hogg and Eunomia Research & Consulting Ltd 2006).
2. Rabl, A., J. V. Spadaro, et al. (2007). "Environmental Impacts and Costs of Solid Waste: A Comparison of Landfill and Incineration." Waste Management & Research **in press**. (Rabl, Spadaro et al. 2007).
3. Holmgren, K. and S. Amiri (2007). "Internalising external costs of electricity and heat production in a municipal energy system." Energy Policy **35**(10): 5242-5253. (Holmgren and Amiri 2007)
4. Eshet, T., O. Ayalon, et al. (2006). "Valuation of externalities of selected waste management alternatives: A comparative review and analysis." Resources, Conservation and Recycling **46**(4): 335-364. (Eshet, Ayalon et al. 2006)
5. HM Customs & Excise (2004). "Combining the Government's Two Health and Environment Studies to Calculate Estimates for the External Costs of Landfill and Incineration, December 2004." (HM Customs & Excise 2004)
6. Turner, G., (Enviro Consulting), D. Handley, (Enviro Consulting), et al. (2004). Valuation of the external costs and benefits to health and environment of waste

management options Final report for DEFRA by Enviro Consulting Limited in association with EFTEC, DEFRA. (Turner, Handley et al. 2004)

1.65 An independent study by Dijkgraaf (Dijkgraaf and Vollebergh 2004) concluded:

“The net private cost of WTE (waste-to-energy) plants is so much higher than for landfilling that it is hard to understand the rational behind the current hierarchical approach towards final waste disposal methods in the EU (European Union). Landfilling with energy recovery is much cheaper, even though its energy efficiency is considerably lower than that of a WTE plant.”

1.66 This conclusion is similar to that reached by the OECD (Organisation for Economic Co-operation and Development (OECD) 2007) this year following their review of waste Management in the UK and the Netherlands:

“In both countries, there is currently a strong preference given to incineration compared to landfilling of waste – as reflected e.g. in the landfill taxes they apply. A similar preference underlies the Landfill Directive of the European Union, which fixes upper limits for the amounts of biodegradable waste member states are allowed to landfill. However, estimates in both countries indicate that the environmental harm caused by a modern landfill and a modern incineration plant are of a similar magnitude, while the costs of building and operating an incinerator are much higher than the similar costs for a landfill. Hence, the total costs to society as a whole of a modern incinerator seem significantly higher than for landfilling - which indicates that some reconsideration of the current preference being given to incineration could be useful.”

1.67 And:

“Analyses of the negative environmental impacts of landfilling and incineration in both countries suggest, however, that the foundation for the present preference for incineration is questionable from the point of view of total social costs”.

1.68 It should be noted that the “social costs” of waste management include the respective *private costs* i.e. the costs to society of building and operating the various management options together with the external environmental costs. In these circumstances it is suggested that the DPD should be changed to ensure that any thermal treatment facility provided CHP and was required to demonstrate that the external costs were lower than the alternatives if sustainability criteria are to be satisfied.

END NOTES:

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Dijkgraaf, E. and H. R. J. Vollebergh (2004). "Burn or bury? A social cost comparison of final waste disposal methods." *Ecological Economics* 50(3-4): 233-247.

ENDS (2008). "Carbon analysis favours MBT waste treatment using anaerobic digestion." *Environmental Data Services (ENDS) Ltd.*(397): 19.

Eshet, T., O. Ayalon, et al. (2006). "Valuation of externalities of selected waste management alternatives: A comparative review and analysis." *Resources, Conservation and Recycling* 46(4): 335-364.

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Rabl, A., J. V. Spadaro, et al. (2007). "Environmental Impacts and Costs of Solid Waste: A Comparison of Landfill and Incineration." *Waste Management & Research* **in press**.

Turner, G., (Enviro Consulting), D. Handley, (Enviro Consulting), et al. (2004). Valuation of the external costs and benefits to health and environment of waste management options Final report for Defra by Enviro Consulting Limited in association with EFTEC, DEFRA.

APPENDIX 2

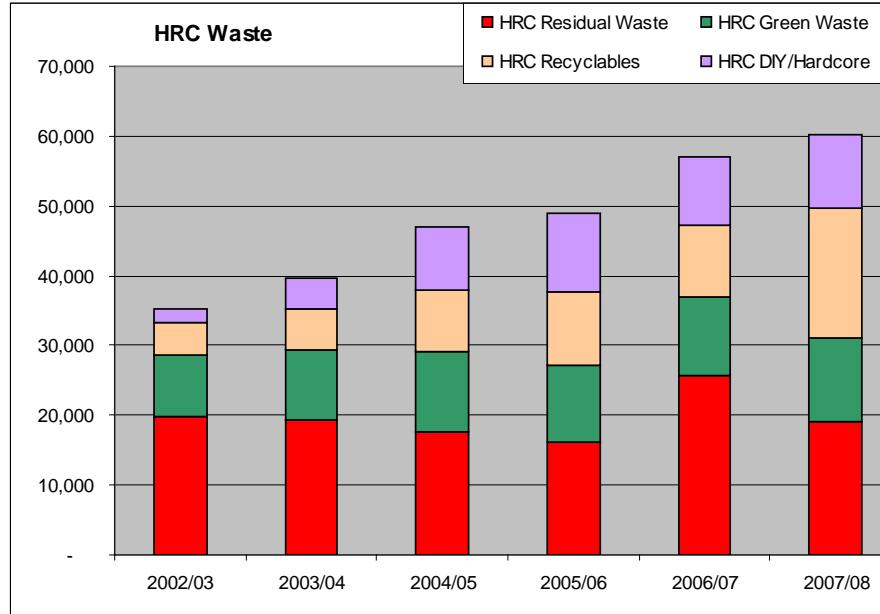
Gloucestershire County Council response to Friends of the Earth comments on Consultation on the Waste Core Strategy

Para . No.	FoE text	GCC response
1.14	<p>It is also not realistic to assume, as the DPD does, that there will be no change in arisings in the face of such large increases in disposal taxes. By 2010 it is clear that practically all treatment (apart from perhaps new thermal capacity, see below) will be cheaper than landfill disposal. In these circumstances market forces will ensure that there is little or no residual landfill demand for commercial and industrial wastes.</p>	<p>We would challenge the statement that "by 2010.... practically all treatment will be cheaper than landfill." Where waste can be separately collected for recycling the increase in landfill tax will obviously drive this. However, this does not allow for the reality of what happens where waste has to be mixed due to operational reasons or where the waste stream has no intrinsic value. Mixed wastes are very expensive to separate and there will be only limited markets for some of these low-grade products therefore landfill will remain viable for mixed wastes and low grade wastes.</p>
1.18	<p>It appears that the total existing treatment capacity actually exceeds the claimed combined MSW and C&I arisings of 786,000 tonnes. There is no reason in principle subject to contractual arrangements why some or all of the surplus commercial /industrial waste treatment capacity should not be available for the relevant part of the municipal waste stream. This should be investigated further as the consequence would clearly be to reduce the need for new treatment facilities. This is the approach adopted in relation to landfill and WCSA says:</p> <p><i>223. For the purposes of making provision for landfill voidspace it is considered prudent to combine the non-hazardous biodegradable and inert MSW and C&I requirements. This is because the two types of waste have a comparable composition, similar site requirements and therefore, unsurprisingly, are currently taken to the same sites in the County.</i></p>	<p>It entirely depends on what the surplus treatment capacity is currently doing. For example it is easy to bulk and transfer waste from a site (whether it is MSW or C&I waste) and with some adaptations this could be achieved quite quickly and easily.</p> <p>However, a site that is treating C&I skip waste is doing an entirely different job to in-vessel composting and therefore to assume that C&I skip treatment capacity can be converted to treat food waste would be very simplistic. Although the "in principle" statement may be true it should not be assumed that treatment capacity available for C&I waste will be easily converted to handle MSW source segregated wastes as these wastes will often need specific technologies to ensure the waste is treated appropriately if it is to be diverted from landfill.</p>
1.22	<p>At present they apparently do not, for example, include sites which have been given planning permission but have not yet come into operation – this would include the 160,000 tpa Cory MBT facility at Wingmoor.</p>	<p>Cory MBT (160,000 tpa) facility at Wingmoor does not have planning approval.</p>
1.24	<p>In Gloucestershire recent planning applications and planning permissions for composting facilities would remove from the wet</p>	<p>22,000 tpa at Sunhill Farm, Cotswolds does not have planning approval.</p>

	<p>biodegradable residual waste stream more than 120,000 tons per annum (tpa) :</p> <ul style="list-style-type: none"> • 25,000tpa initially increasing to 48,000 tpa by Bioganix at Sharpness, Stroud District, • 32000 tpa at Wingmoor Farm, Tewkesbury District (S106 to be agreed) • 25,000 tpa at Dymock, Forest of Dean • 22,000 tpa at Sunhill Farm, Cotswolds (subject to planning) 	
1.31	<p>It is important first to consider the actual growth in the recent past. When the full, monthly, data from the WDA is plotted on an annual basis the results are:</p> <p>(See <i>FoE comments in Appendix 1</i>)</p>	<p>The data presented in the table is incorrect. The data starts in 2002 by presenting the Municipal Waste tonnages <u>not</u> the household waste tonnages. Municipal waste includes all household waste collected by the WCAs <i>and</i> all waste collected and disposed of by the WDA, this includes all commercial (trade) waste collected by the WCAs.</p> <p>The data presented fails to take account of changes to the disposal arrangements made by two districts Cheltenham Borough Council and Gloucester City Council. In April 2005 Cheltenham Borough Council made the decision to remove the residual commercial waste they collect from the County Council disposal contract and to deliver it via a separate contract to Grundons. The quantity of waste removed from the county contract is approximately 4,820 tonnes, which was delivered under a separate contract to Grundons. In April 2007 Gloucester City also made similar arrangements and removed approximately 3,600 tonnes of the residual commercial waste they collect from the County Council disposal contract and delivered it to Cory under a separate contract. If we are to calculate the historical rate of growth in the waste stream it is therefore vital that the wastes included do not change over time as this will skew the results.</p> <p>Correcting the table presented by FoE for the municipal waste tonnages removed from the figures from 2005 we now have the following table which sets out the revised tonnages and also extends back to 1998.</p>
1.32	<p>These data are based on total household wastes, including those from CA sites, but exclude the commercial waste collected by the WDA. This is because the commercial wastes are essentially arbitrary and discretionary. They will fluctuate with price and thus distort the long-term trends for the wastes that the authority has an</p>	<p>The tonnage data as presented is not household waste data it is municipal waste data as it includes all household waste collected by the WCAs and all waste collected and disposed of by the WDA. This includes all commercial (trade) waste collected by the WCAs and soil and rubble collected by the WDA at their Household Recycling Centres (CA sites).</p>

	<p>obligation to collect. Trade waste has, in any case, fallen from about 8,500 tonnes in 2002/3 to c.5,700 tonnes in 2006/7 and so would tend to reduce the apparent growth rate.</p>																																	
1.33	<p>The table shows the following waste growth based on these total household and CA site arisings:</p> <table border="1"> <thead> <tr> <th>Year</th><th>Growth</th></tr> </thead> <tbody> <tr> <td>2002</td><td></td></tr> <tr> <td>2003</td><td>3.3%</td></tr> <tr> <td>2004</td><td>5.8%</td></tr> <tr> <td>2005</td><td>0.5%</td></tr> <tr> <td>2006</td><td>1.7%</td></tr> <tr> <td>2007</td><td>0.0%</td></tr> <tr> <td>2008</td><td></td></tr> </tbody> </table>	Year	Growth	2002		2003	3.3%	2004	5.8%	2005	0.5%	2006	1.7%	2007	0.0%	2008		<p>The table presented is incorrect here is a corrected table.</p> <table border="1"> <thead> <tr> <th>Year</th><th>Growth</th></tr> </thead> <tbody> <tr> <td>2002</td><td></td></tr> <tr> <td>2003</td><td>4.6%</td></tr> <tr> <td>2004</td><td>5.8%</td></tr> <tr> <td>2005</td><td>1.7%</td></tr> <tr> <td>2006</td><td>2.1%</td></tr> <tr> <td>2007</td><td>1.4%</td></tr> <tr> <td>2008</td><td></td></tr> </tbody> </table>	Year	Growth	2002		2003	4.6%	2004	5.8%	2005	1.7%	2006	2.1%	2007	1.4%	2008	
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1.35	<p>Since 2004 the average annual growth has been just 0.8%.</p>	<p>Since 2004 the average annual growth rate has been 2.7%.</p>																																

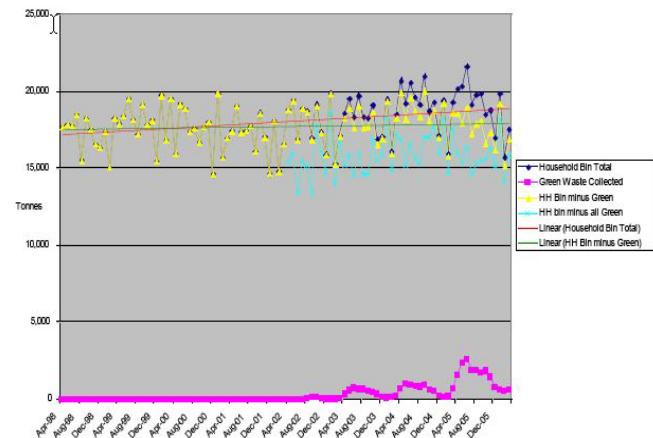
1.36	2002-3 2003-4 2004-5 2005-06 2006-7 Average							2002-03 2003-04 2004-05 2005-06 2006-07 Average								
	WCA Municipal Waste		Annual growth		Recyclables (via Districts)		Household Recycling Centres		WCA Municipal Waste		Annual Growth		Recyclables (via Districts)		Household Recycling Centres	
	211,989	206,396	207,870	189,519	180,458				211,989	206,396	207,870	194,339	185,278			
	-2.64%	0.71%	-8.83%	-4.78%	-3.88%				-2.64%	0.71%	-6.51%	-4.66%	-3.26%			
	Recyclables (via Districts)								Recyclables (via Districts)							
	Green	2,401	6,426	9,921	20,407	28,951			Green	2,401	6,426	9,921	20,407	28,951		
	Dry Recyclables	26,972	32,354	36,162	39,873	42,543			Dry Recyclables	26,972	32,354	36,162	39,873	42,543		
	Total Recyclables	29,373	38,780	46,083	60,280	71,494			Total Recyclables	29,373	38,780	46,083	60,280	71,494		
	Annual growth	32.03%	18.83%	30.81%	18.60%	25.07%			Annual Growth	32.03%	18.83%	30.81%	18.60%	24.14%		
	Household Recycling Centres								Household Recycling Centres							
	Recyclables	5,698	7,739	10,967	13,062	12,601			Recyclables	5,698	7,739	10,967	13,062	12,601		
	Green Waste	9,995	11,030	12,853	11,869	12,652			Green Waste	9,995	11,030	12,853	11,869	12,652		
	Residual Waste	23,813	22,119	20,543	18,936	29,690			Residual Waste	23,813	22,119	20,543	18,936	29,690		
	DIY/Hardcore	2,359	5,480	10,586	12,870	11,232			DIY/Hardcore	2,359	5,480	10,586	12,870	11,232		
	Total	41,865	46,368	54,949	56,737	66,175			Total	41,865	46,368	54,949	56,737	66,175		
	3rd Party Recyclables	267	434	585	785	1196			3rd Party Recyclables	267	434	585	785	1,196		
	TOTAL ARISINGS	283,493	291,978	309,486	307,322	319,323			TOTAL ARISINGS	283,494	291,978	309,486	312,142	324,143		
	Annual growth	2.99%	6.00%	-0.70%	3.91%	3.05%			Annual Growth	2.99%	6.00%	0.86%	3.84%	3.40%		
	Subtract Greenwaste	281,093	285,552	299,565	286,914	290,372			Subtract Green Waste	281,093	285,552	299,565	291,734	295,192		
	Annual growth	1.59%	4.91%	-4.22%	1.21%	0.87%			Annual Growth	1.59%	4.91%	-2.61%	1.19%	1.22%		
	Subtract Hardcore	278,733	280,072	288,979	274,044	279,140			Subtract Hardcore	278,734	280,072	288,979	278,864	283,960		
	Annual growth	0.48%	3.18%	-5.17%	1.86%	0.09%			Annual Growth	0.48%	3.18%	-3.50%	1.83%	0.46%		
	The results appear slightly differently when presented on the financial year basis:							Again this table of tonnage data is incorrect. The corrected table is shown below.								
1.38	This has not been a particularly sensible approach to waste management and, as the green waste is practically all "new" waste which would previously have been left in gardens or composted at home. It should not be used as a basis to project overall growth rates. When green waste is removed it can be seen that over the period from 2002-3 reduces to just 0.87% - much closer to the national average of c. 0.5% indicated in Waste Strategy 2007.							The statement that "the green waste is practically all new" is not borne out by the facts. In the case of the Cotswolds a substantial quantity of garden waste, which was being landfilled, has been diverted into composting. Between 2004/05 and 2005/06 approximately 2,300 tonnes of residual waste "disappeared" it seems reasonable to assume that a significant quantity of this waste was diverted into composting. If this was the case then 30% of the garden waste was in fact not "new" but was diverted from the residual waste stream. There seems to be no rationale in the idea that green waste should not be used in the projection of overall growth rates.								

1.39	<p>The increased emphasis on collection of DIY/hardcore wastes at HRCs has also almost certainly generated mainly 'new'. Hardcore would rarely have been put out with residual domestic waste and, if produced and disposed of at all, would mainly have been collected in skips and would then most likely have been recycled as part of the C&D stream. If hardcore waste growth is removed from the equation then it can be seen that the average growth rate since 2002 is only 0.09%.</p>	<p>Again there is a false statement that new hardcore has been generated. There is a fundamental misunderstanding here; waste is not generated because a system is designed to collect it, it is generated and then a system is designed to capture it.</p> <p>It has been a specific strategy to "mine" recyclables including the hardcore type materials from the residual waste stream. As can be seen from the chart below with the exception of 2006/07, the contract change year, this strategy has been successful in reducing the residual waste being landfilled, despite overall growth in the quantity of waste being delivered to the sites.</p>  <table border="1"> <caption>HRC Waste Data (Approximate Values in thousands)</caption> <thead> <tr> <th>Financial Year</th> <th>HRC Residual Waste</th> <th>HRC Green Waste</th> <th>HRC Recyclables</th> <th>HRC DIY/Hardcore</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>2002/03</td> <td>20,000</td> <td>8,000</td> <td>5,000</td> <td>2,000</td> <td>35,000</td> </tr> <tr> <td>2003/04</td> <td>19,000</td> <td>9,000</td> <td>6,000</td> <td>3,000</td> <td>37,000</td> </tr> <tr> <td>2004/05</td> <td>18,000</td> <td>10,000</td> <td>7,000</td> <td>4,000</td> <td>39,000</td> </tr> <tr> <td>2005/06</td> <td>17,000</td> <td>9,000</td> <td>8,000</td> <td>5,000</td> <td>41,000</td> </tr> <tr> <td>2006/07</td> <td>26,000</td> <td>10,000</td> <td>9,000</td> <td>6,000</td> <td>51,000</td> </tr> <tr> <td>2007/08</td> <td>19,000</td> <td>11,000</td> <td>10,000</td> <td>7,000</td> <td>57,000</td> </tr> </tbody> </table> <p>The argument seems to be that we could have a lower growth rate if we did not count certain bits of the waste stream, that is self evident however the growth will not disappear it will simply appear somewhere else in the system e.g. in the C&I figures.</p>	Financial Year	HRC Residual Waste	HRC Green Waste	HRC Recyclables	HRC DIY/Hardcore	Total	2002/03	20,000	8,000	5,000	2,000	35,000	2003/04	19,000	9,000	6,000	3,000	37,000	2004/05	18,000	10,000	7,000	4,000	39,000	2005/06	17,000	9,000	8,000	5,000	41,000	2006/07	26,000	10,000	9,000	6,000	51,000	2007/08	19,000	11,000	10,000	7,000	57,000
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1.40	<p>The majority of the increase in arisings has also come from HRCs. The experience in many parts of the country has been that the landfill tax and compounded increases in disposal costs has resulted in some 'bleeding' of trade wastes into the domestic stream as a result of the landfill tax. This includes small traders bringing waste home and leaving their trade waste with their household waste for collection; an increase in waste from the larger numbers of self employed or other full or part-time home workers; traders using Civic amenity sites or tradesmen leaving waste behind on domestic contracts which would previously have been removed. If this is happening in Gloucestershire, as seems likely, then the implication would be that the total household waste is actually decreasing.</p>	<p>There is without doubt a quantity of trade waste delivered to the HRCs illegally, however independent studies have shown this has remained a constant problem at about 5% of the total waste being delivered to the HRCs. If this waste were not delivered to the HRCs the question is not whether the waste stream would be decreasing but where it would end up. It would still be waste which would need to go somewhere either through fly tipping collected by WCAs or through commercial sites.</p>
1.41 – 1.44	<p>The generation of new green waste, as described above, is essentially what Eunomia found in their review for the Authority in 2006 (Eunomia Research & Consulting 2006). The light blue lines on the chart below show the waste with green waste removed. Eunomia obviously did not, at that time, have the benefit of the more recent data for the County:</p>	<p>The data in the Waste Core Strategy data document already shows residual waste tonnage reducing from 213,252 tonnes to 164,039 tonnes in 2027/28. This is a 23% reduction over the period and the residual tonnage is either showing flat line growth or negative growth so it is unclear what point is being made in this area of the response.</p>

5.1.1 Bin Waste

Figure 1. Gloucestershire Bin Waste Arisings By Month



1.41 The difference between these assumptions and those in the DPD are large and the impacts are highly significant for much of the future need and strategy.

1.42 The assessment upon which the growth rates in the plan are based does not take into account the increased environmental imperatives which follow from the recognition that climate change is real and requires urgent action; it ignores the huge increases in disposal and treatment costs, which, even though not directly passed to the residents – will have major impacts on the incentives for authorities to promote waste reduction – such as home composting. The higher costs will justify much more significant investment than has historically been the case. It also ignores technological changes. These are inevitable – think, for example, of the demise of video tape and CDs – now largely replaced with almost waste free digital media or the downsizing and dematerialisation of electronic equipment. Also not considered are the increased impacts

	of extended producer responsibility legislation which not only mandates recovery but provides a powerful incentive for manufacturers to de-materialise their products.	
1.44	A more appropriate approach for the DPD is to make assumptions zero growth as there is absolutely no evidence that supports an argument that municipal/ household waste arisings in Gloucestershire are growing. Sensitivity bands through to ±1% could be included to ensure a robust outcome.	Historically, municipal waste has continued to grow. It would therefore not be prudent to assume zero growth. Housing and population trends indicate a rise in households by 2,500 per annum up to 2026 and it is predicted that this will continue to rise. In addition population is rising, particularly with the increased trends of migration. We recognise that waste minimisation will be influenced by producer responsibility but there are other factors driving overall waste growth.
1.45	It is of some concern not all the relevant waste data and projections are in the public domain – particularly the revisions to landfill capacity assessment and the growth rates used to support the Outline business case of the PFI.	Landfill capacity assessment was not carried out as part of the residual waste project; therefore there is no information to share. Growth rates to support the Expression of interest were the same as those used in the JMWMS, however the recent population growth and household trends was not taken into account. Therefore, the OBC is based on new growth rates and this will be shared on completion of the OBC.
1.46	Whilst the targets set in the plan for recycling would have been considered ambitious only five years ago they must now be seen as moderate in the context of the demonstrated recycling rates in parts of Europe. Flanders, for example, currently achieves over 70% recycling (Fogarty, Reid et al. 2008).	We acknowledge the high achievements of Flanders, who are the oft cited example of best practice in Europe.
1.47	Scotland has recently set new recycling targets exceeding 70% for recycling and Wales is likely to follow with similar targets: (See FoE comments in Appendix 1)	For clarification, Scotland have recently proposed high recycling targets, and are consulting on targets of 60% by 2020 and 70% by 2025. Any comparison with our JMWMS targets should be made on these same terms. Our own strategy targets are exactly the same for 2020 (at 60%) but our strategy does not currently look beyond this date. We believe that 60% is a realistic target to set for 2020 whilst exceeding the 50% target set in the Waste Strategy for England 2007. Achieving more will result in less residual waste but a need for greater recycling capacity.
1.50 and 1.53 - 1.54	<p>It is not clear how the data for landfill voidspace in the DPD has been established.</p> <p>The 2004 Gloucestershire Waste Local Plan (Gloucestershire County Council 2004) corrected this and says, in relation to landfill void:</p>	See section main body of the response report and in particular section 2. Also Section 8 of Technical Evidence paper WCS- A 'Waste Data' clarifies the latest position of the WPA.

	<p>LANDFILL POSITION</p> <p>3.22 Currently it is estimated that over 17 million cubic metres of permitted and licensed landfill and landraising void space exists in Gloucestershire. In 2002 operators are required to declare the void space to be devoted to hazardous or non-hazardous waste. The Environment Agency estimates that 13 million cubic metres could be assigned to non-hazardous, which includes municipal waste.</p> <p>It seems exceedingly unlikely that the difference between the DPD and the WLP (representing about 6 million m³ of landfill capacity has been filled in the past two years. Gloucestershire County Council proof WPA 1 indicated that the County was aware of the potential reporting errors in the data :</p> <p>"Figures quoted in the amended section 3.19 (WLP) are for the licensed void space allowed for landfill according to the information provided by Environment Agency records. This may not represent the complete void space that could potentially be available. It is possible that waste contractors operating sites within the County have not declared the full extent of their potential landfill capacity and as such there is likely to be more than adequate landfill space within the County even at current input rates"</p>	
1.51	<p>The DPD confirms that the Environment Agency website state that Gloucestershire has 20 years of landfill capacity remaining as at 31/3/05 (based on a remaining voidspace of 15 million m³ for non-inert waste). It also says that "The Environment Agency have advised that these four landfill sites have (at Feb 2007) a combined voidspace capacity of around 8,985,000m³ for non-hazardous waste." The obvious approach would have been to ask the Environment Agency, upon whose data the voidspace figures depend, to reconcile the differences. If this has been done then where is the explanation? If it has not been done then why not?</p>	<p>It is unclear from which documents FoE have obtained this landfill capacity figure. This seems to relate to much older figures contained within the WLP. The position has clearly moved on which the WPA have outlined through Annual Monitoring Reports. See section in the main body of the response report and in particular Section 2. Also section 8 of Technical Evidence paper WCS- A 'Waste Data' for which the WPA clarifies the latest position. This is based on working with information provided by the Environment Agency.</p>
1.52	<p>There was a similar issue at the previous waste local plan public inquiry. The County evidence on need presented a case</p>	<p>This appears to be running over old issues which were considered through the WLP Public Inquiry process of 2001/2002. The position has clearly moved on which the WPA</p>

	<p>in which there was an under reporting of available (and <u>licensed</u>) void space of the order of 9 million cubic metres. This related, I understand to a single landfill site (WIngmoor East) the capacity of which had been recorded as the engineered area and not the total licensed area.</p>	<p>have outlined through Annual Monitoring Reports. See section main body of the response report and in particular section 2. Also section 8 of Technical Evidence paper WCS- A 'Waste Data' for which the WPA clarifies the latest position. This is based on working with the Environment Agency.</p>
1.55	<p>It would appear that the same issues may have arisen again. Clearly this is an important issue – not least because it affects the landfill capacity available, for example, for disposal of MBT residues. It urgently needs to be resolved because it seems likely that the County, with the already consented 160,000 tonnes per annum of MBT capacity would already be able to deal with all the residual wastes with no further major facilities being needed.</p>	<p>The MBT capacity is not approved at the present time.</p>
1.56	<p>The projected requirements for 'Strategic' facilities. It is unclear why the plan considers that there is any further need for residual treatment facilities in the light of the above. Other facilities needed for treatment, again if needed – and any need is likely to be much less than currently suggested, 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.</p>	<p>MBT is not approved, therefore there is a requirement for residual treatment capacity, whether central or dispersed.</p> <p>The JMWMS states that "residual waste as a resource" (Objective 5) aiming to divert waste from landfill.</p>
1.57	<p>It is frustrating to observe that in spite of the existing capacity the County seems determined to attempt to develop thermal treatment options at Javelin Park.</p>	<p>The County Council has identified five options that it will consider including MBT producing a residue to landfill.</p>
1.58	<p>This site seems poorly suited to the need for combined heat and power which is necessary to make the site at all efficient in climate change terms. This is clearly an important planning consideration (Communities and Local Government 2007).</p>	<p>Javelin Park is one of a number of locations across Gloucestershire that has been identified as being able to deliver a residual waste facility. Even if Javelin Park is acquired, the County Council will encourage other sites to come forward and as stated in the OBC this would be either used as a strategic site or as part of a dispersed solution.</p>

1.59	<p>Furthermore the Waste Incineration Directive (European Commission 2000) says:</p> <p>Article 4 (2)(b) :</p> <p><i>(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;</i></p> <p>Article 6 (6):</p> <p><i>6. Any heat generated by the incineration or the co-incineration process shall be recovered as far as practicable.</i></p>	<p>The seven local authorities in Gloucestershire have adopted a joint strategy to divert waste from landfill this includes;</p> <ul style="list-style-type: none"> ➤ Stabilising waste growth by campaigns such as home and community composting, real nappies and smart shopping, ➤ increasing recycling and composting levels to a minimum of 60% by 2020 and ➤ treating residual waste as a resource. <p>To achieve this strategy there is the need for facilities to be in place to bulk waste materials, transport waste materials and products, recycle and compost those materials and treat the left over waste and finally landfill any remainder. The county has consented capacity for bulking and transfer capacity to meet its current needs and in-vessel composting capacity which is likely to meet its needs up to 2020, however the changes facing waste management and the flexibility required mean that it is unlikely that the future needs can be met within the current consented capacity. This will mean that more facilities of all kinds will be required to meet the objective of recycling and composting a minimum of 60% by 2020. Failure of the WPA to plan for this need will undermine the Joint Municipal Waste Management Strategy and consequently the need for residual treatment and or landfill would be increased.</p>
1.60	These requirements can only be secured at the planning stage and should be addressed in the DP.	
1.61	We note also that Defra's Outline Business Case template for PFIs (Department for Environment Food and Rural Affairs (DEFRA) 2008) says:	
1.62	<p><i>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:</i></p> <p>Without CHP any application must be very much weaker than would otherwise be the case. The reason is again demonstrated by the Counties consultants ((Hogg and Eunomia Research & Consulting Ltd 2006; ENDS 2008):</p>	<p>Once all the recycling and composting is happening we need to divert municipal waste from landfill to meet our obligations under the WET Act 2003 to divert biodegradable waste from landfill. There is currently no consented capacity for residual treatment within the county apart from landfill and the WDA has therefore set out how it intends to put in place contracts to deal with the remaining residual waste. No decision has been made on the location or technology that will be employed, and the County Council has gone to great lengths to ensure that does not favour one particular technology above another. The County Council has passed a motion that states:</p> <p><i>"GCC will not commit to the technology of a single site incinerator (Javelin Park/Hunts Grove Site) without, investigating all of the options and considering the full range of available technologies, taking account of the environmental as well as financial impact of each"</i></p>

CARBON COST OF RESIDUAL WASTE TREATMENT	
	£ per tonne of waste
1.63	MBT with anaerobic digestion generating heat and electricity 6.01
	Autoclaving, followed by gasification 8.38
	MBT producing stabilised output for landfill 9.55
	Incineration with CHP 10.21
	MBT producing RDF for gasification 10.71
	MBT producing RDF for incineration 10.97
	Incineration generating electricity only 11.45
1.64	Landfill 31.90
<p>Showing the high carbon costs associated with thermal treatment compared with the options described above of MBT with stabilized output to landfill for residual wastes in the county after the higher recycling rates proposed.</p> <p>This conclusion is supported by a large body of literature showing that the external costs of thermal treatment are actually very similar to those for landfill. Studies finding similar results include, but are certainly not limited to:</p> <ol style="list-style-type: none"> 7. Eunomia, A Changing Climate for Energy from Waste?, Final report for Friends of the Earth, 03/05/2006. (Hogg and Eunomia Research & Consulting Ltd 2006). 8. Rabl, A., J. V. Spadaro, et al. (2007). "Environmental Impacts and Costs of Solid Waste: A Comparison of Landfill and Incineration." <u>Waste Management & Research</u> in press. (Rabl, Spadaro et al. 2007). 9. Holmgren, K. and S. Amiri (2007). "Internalising external costs of electricity and heat production in a municipal energy system." <u>Energy Policy</u> 35(10): 5242-5253. (Holmgren and Amiri 2007) 	

	<p>10. Eshet, T., O. Ayalon, et al. (2006). "Valuation of externalities of selected waste management alternatives: A comparative review and analysis." <i>Resources, Conservation and Recycling</i> 46(4): 335-364. (Eshet, Ayalon et al. 2006)</p> <p>11. HM Customs & Excise (2004). "Combining the Government's Two Health and Environment Studies to Calculate Estimates for the External Costs of Landfill and Incineration, December 2004." (HM Customs & Excise 2004)</p> <p>12. Turner, G., (Enviro Consulting), D. Handley, (Enviro Consulting), et al. (2004). Valuation of the external costs and benefits to health and environment of waste management options Final report for DEFRA by Enviro Consulting Limited in association with EFTEC, DEFRA. (Turner, Handley et al. 2004)</p>	
1.65	<p>An independent study by Dijkgraaf (Dijkgraaf and Vollebergh 2004) concluded:</p> <p><i>"The net private cost of WTE (waste-to-energy) plants is so much higher than for landfilling that it is hard to understand the rational behind the current hierarchical approach towards final waste disposal methods in the EU (European Union). Landfilling with energy recovery is much cheaper, even though its energy efficiency is considerable lower than that of a WTE plant."</i></p>	Without having seen this specific study it is difficult to comment in detail. However, the County Council would not enter into a contract for the treatment of residual waste that does not offer the benefit of a reduced cost and improved environmental performance when compared with landfilling.
1.66	<p>This conclusion is similar to that reached by the OECD (Organisation for Economic Co-operation and Development (OECD) 2007) this year following their review of waste Management in the UK and the Netherlands:</p> <p><i>"In both countries, there is currently a strong preference given to incineration compared to landfilling of waste –</i></p>	

	<p>as reflected e.g. in the landfill taxes they apply. A similar preference underlies the Landfill Directive of the European Union, which fixes upper limits for the amounts of biodegradable waste member states are allowed to landfill.</p> <p>However, estimates in both countries indicate that the environmental harm caused by a modern landfill and a modern incineration plant are of a similar magnitude, while the costs of building and operating an incinerator are much higher than the similar costs for a landfill.</p> <p>Hence, the total costs to society as a whole of a modern incinerator seem significantly higher than for landfilling - which indicates that some reconsideration of the current preference being given to incineration could be useful."</p> <p>And:</p> <p>"Analyses of the negative environmental impacts of landfilling and incineration in both countries suggest, however, that the foundation for the present preference for incineration is questionable from the point of view of total social costs".</p> <p>It should be noted that the "social costs" of waste management include the respective <i>private costs</i> i.e. the costs to society of building and operating the various management options together with the external environmental costs. In these circumstances it is suggested that the DPD should be changed to ensure that any thermal treatment facility provided CHP and was required to demonstrate that the external costs were lower than the alternatives if sustainability criteria are to be satisfied.</p>	
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Appendix 3

Waste Core Strategy Preferred Options

**Non-statutory consultation using a
briefer questionnaire aimed at
engaging a wider audience**

**Report summarising Schedule of
Representations and
Gloucestershire County Council's
Responses**

Contents

Introduction

Question One - Statistics

Question One - Summary of comments & GCC response

Question Two - Statistics

Question Two - Summary of comments & GCC response

Diversity monitoring

Summary of general comments on the questionnaire & GCC response

Conclusion

Appendix A – Comments provided to question one

Appendix B – Comments provided to question two

Appendix C – General comments on the questionnaire

Introduction

At the Waste Core Strategy Preferred Options stage, a statutory consultation process was undertaken. This involved a questionnaire designed to read in conjunction with the Preferred Option Report, the SA, AA reports and accompanying evidence papers.

Due to the nature of the subject, the reports and questionnaires contained a certain amount of technical information. As a result, it was possible that the wider public would be deterred from answering the questionnaire.

Therefore in an attempt to reach a wider audience, a non-statutory consultation was undertaken with a brief questionnaire deliberately designed to be a stand-alone document that could be understood by people with little or no prior knowledge of waste issues. It also provided an opportunity to raise awareness of the waste planning process in Gloucestershire and potentially attract new members to join the regular minerals and waste consultation database.

It was not compulsory for participants to provide any contact details to the shortened questionnaire therefore the County Council were not able to consider the responses as part of the statutory process. However, the contents of this report are summarised and included as additional evidence when considering the overall responses to the statutory questionnaire.

Question One - Statistics

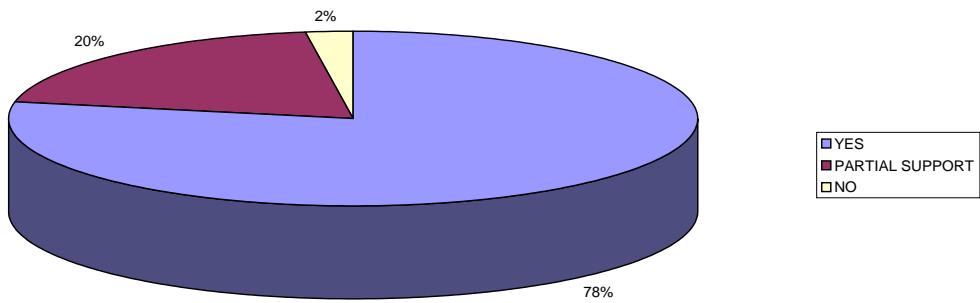
Do you support the proposed strategic objectives in our Waste Core Strategy?

Table 1: Summary of Responses to Question One

Objective	Yes	Partial Support	No	Total Responses
A	68	17	2	87
B	75	9	2	86
C	85	2	0	87
D	72	15	0	87
E	75	10	1	86

Objective A - To influence Gloucestershire's residents to reduce the amount of waste they produce through raising awareness of waste issues. And then subsequently to encourage them to view any waste they do generate as a resource for which they must take communal responsibility.

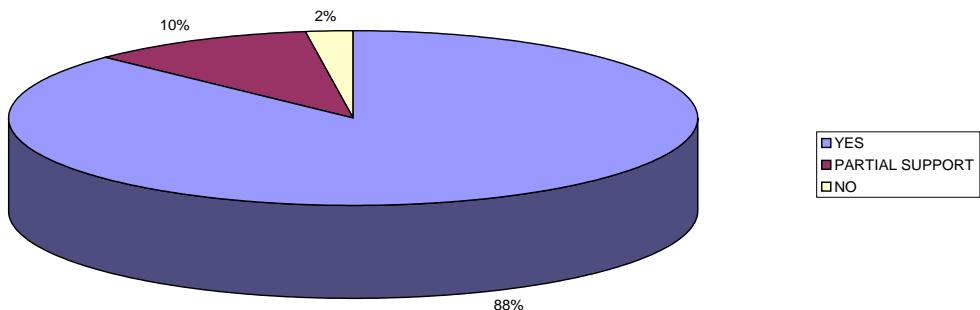
Figure 1: Percentage of responses to Objective A



All 87 respondents provided a response in relation to objective A. The results show majority full support for Objective A with only 2% of respondents unsupportive.

Objective B - To make the best use of Gloucestershire's waste by encouraging competitive markets for goods made from recycled materials and obtaining a benefit (value) from left over (residual) waste materials.

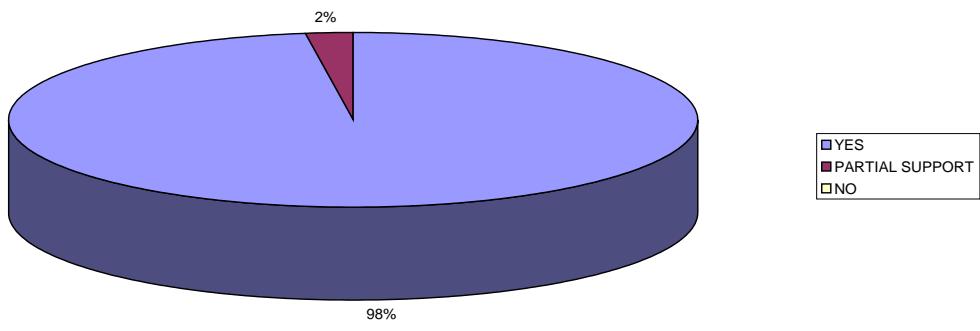
Figure 2: Percentages of Responses to Objective B



86 out the 87 respondents provided a response in relation to objective B. Those who responded to this question showed a majority full support for Objective B with only 2% of respondents unsupportive.

Objective 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.

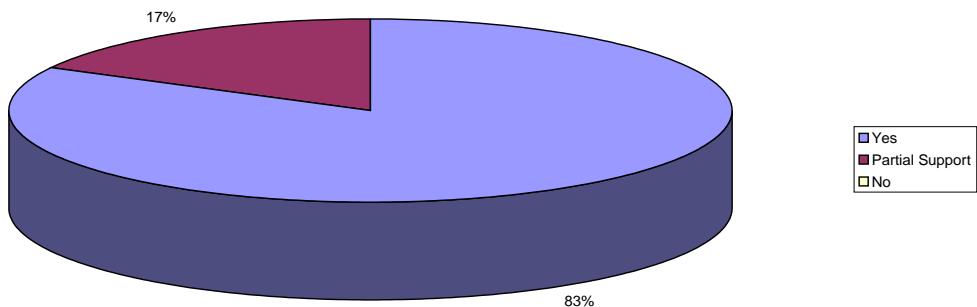
Figure 3: Percentages of Responses to Objective C



All 87 respondents provided a response in relation to objective C. The results show an overwhelming majority of full support for Objective C with no respondents unsupportive of this objective.

Objective 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.

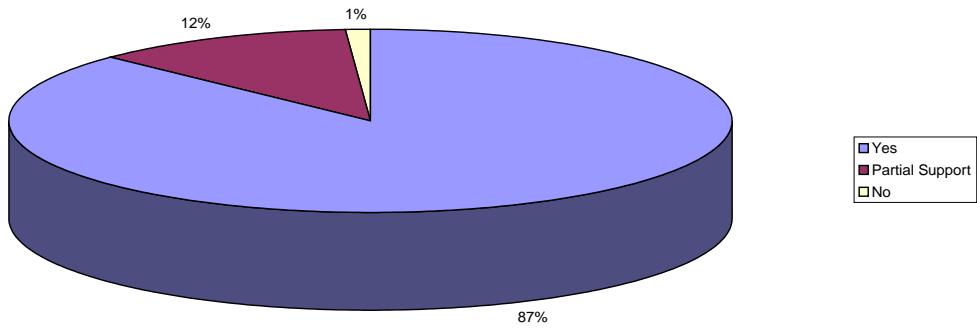
Figure 4: Percentages of Responses to Objective D



All 87 respondents provided a response in relation to objective D. The results show a majority of full support (83%) for Objective D with no respondents unsupportive of this objective.

Objective 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.

Figure 5: Percentages of Responses to Objective E



86 out the 87 respondents provided a response in relation to objective E. Those who responded to this question showed a majority full support for Objective A (87%) with only 1% of respondents unsupportive.

Question One - Summary of comments & GCC response

Non-household waste

Several consultees made comments relating to the volumes and types of waste produced by businesses, manufacturers and retailers and making legislative decisions to control these.

Through the Waste Core Strategy, the waste planning authority (WPA) will seek to make provision for all waste streams within the county. However, the WPA does not have any control over what volume or type of waste is produced within the county or which contractors private businesses commission to manage their waste. Policies contained within local development frameworks must be in conformity with national policy and the Regional Spatial Strategy, any legislation must be created by central government.

Recycling Issues

There were several issues raised in relation to the types of waste which can or cannot be recycled within the county or within individual districts.

The strategic objectives are wholly supportive of measures to promote and increase recycling. However, the WPA has no control over what can or cannot be recycled within the county. These matters are for the waste disposal authority and respective waste collection authorities to resolve.

Charging for waste collection

There were several comments reflecting opposition to charging for individual waste collections and concerns that this would lead to fly-tipping.

This is not an issue that would be within the scope of the Waste Core Strategy.

Community Involvement/Responsibility

There were several comments agreeing that there should be regular community involvement/education with regards to waste issues. There were also comments in regards to not understanding the term 'Communal Responsibility' or how it could work.

The objective of viewing waste generated as a resource, for which communal responsibility must be taken, covers all communal issues from each small community having its own small scale recycling facilities or each district being provided with appropriate facilities to managing the county's waste within the county.

Technologies and Sites

There were several comments positively encouraging more recycling, home composting and reducing waste. There were mixed comments in relation to incineration and landfill with some people pro-landfill and anti-incineration and some people anti-landfill and pro-incineration. Some comments were in relation to specific sites and some consultees made favourable comments towards increasing local facilities. One consultee was not supportive of safeguarding sites from other future development. (These comments were echoed in both question 1 and question 2).

The strategic objectives are favourable to measures aiming to treat waste as a resource and reduce the amount of residual waste that is produced. These comments will be considered in future documents when specific sites or technologies may be discussed.

Sustainable Transport/Importing Waste

There were concerns raised about waste from outside the county being imported to sites within the county and also that waste should be disposed of at the nearest appropriate facility. Comments were also made regarding using sustainable transport methods.

The waste management requirements for Gloucestershire are outlined within the Preferred Options papers.

Question Two - Statistics

Where to put waste facilities

Figure 6: Option A - Broad Search Area

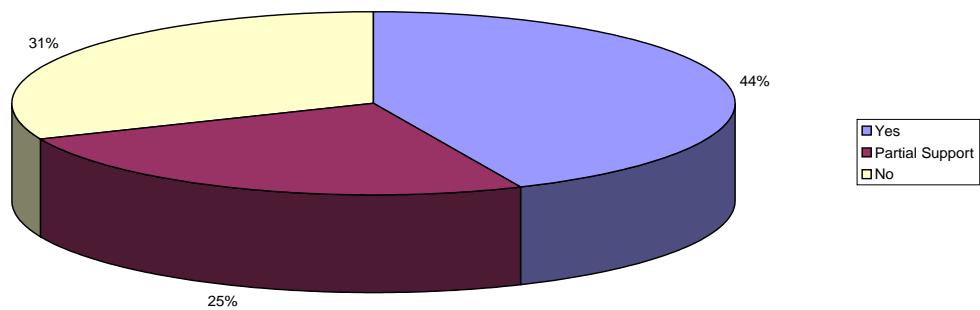


Figure 7: Option B - Urban Locations Within Zone C

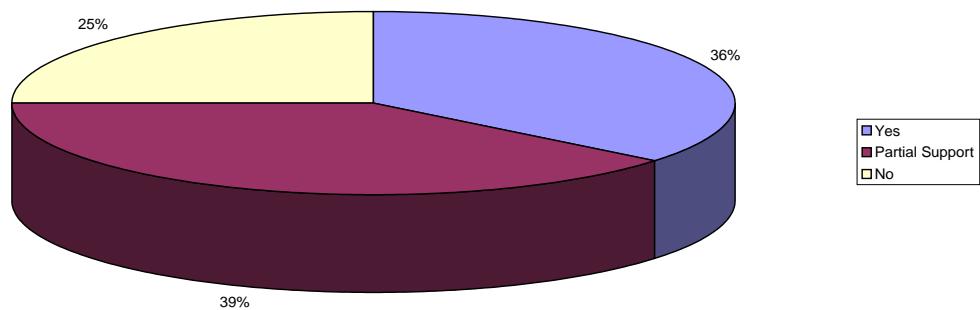


Figure 8: Option C - Urban Locations Within Areas C2, C3 and C4

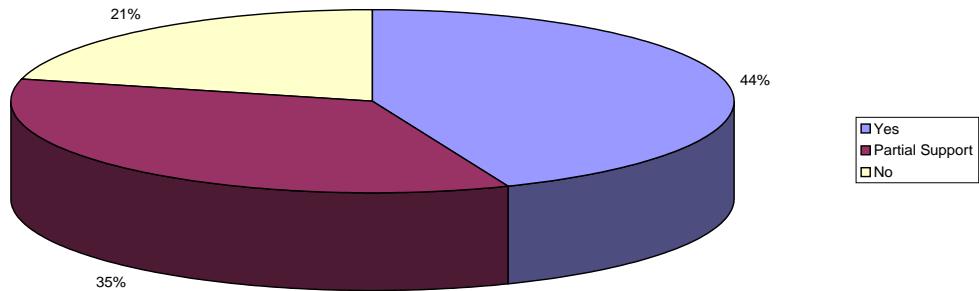


Figure 9: Option D - Area C4

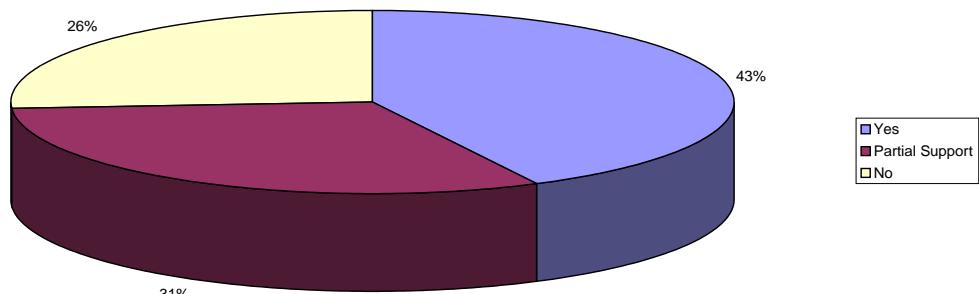


Figure 10: Summary of Options

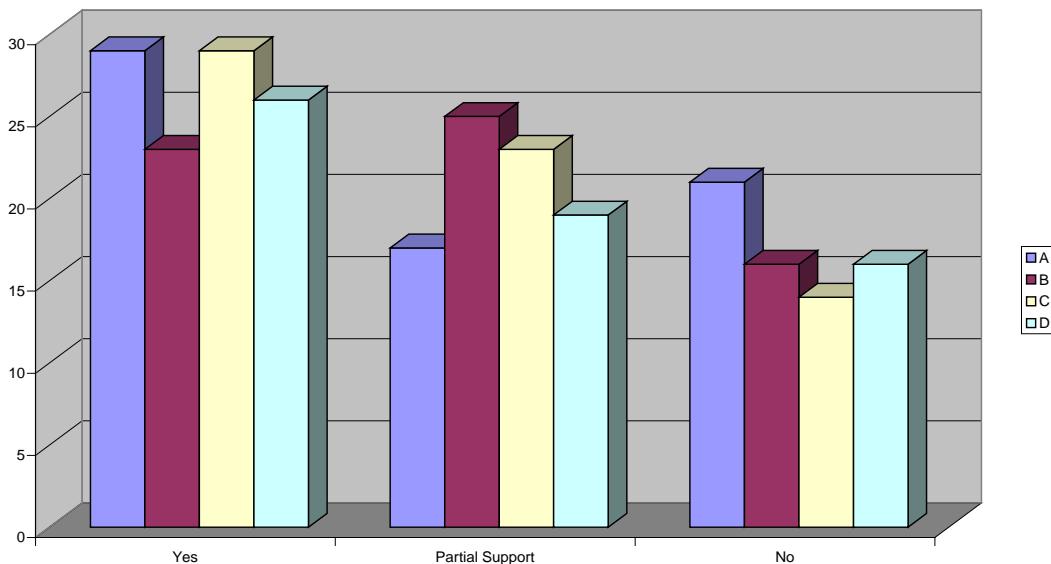
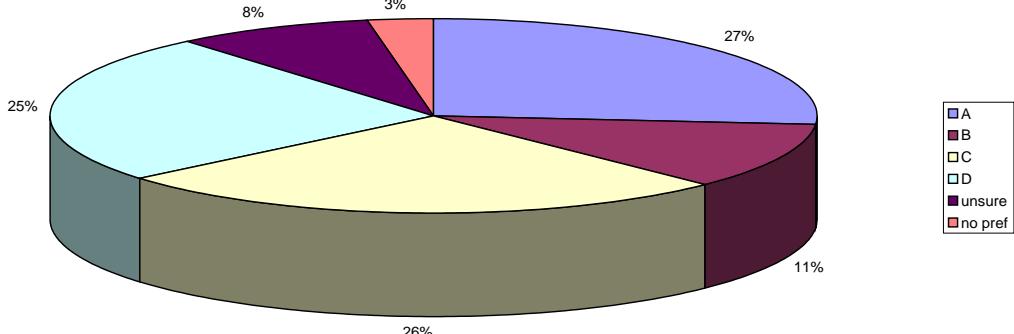


Figure 11: Preferred Option



The above charts show that with each option more people supported or partially supported the option than did not support the option.

Where people were asked to specify their most preferred option, it was almost equally split between options A, C and D with the least amount of people preferring option B.

The responses would suggest that there is no obvious overall preferred option.

Question Two - Summary of comments & GCC Response

Terminology

More than one consultee felt that the term 'waste management facilities' needs clarification. It was also mentioned that the question was confusing and there was insufficient information provided to support the question.

The types of waste management facilities which are covered by the WCS are contained in the Preferred Options documents. Detailed explanation of the different waste management processes is explained in Waste Evidence report WCS-G 'Waste Facility Types'

Sustainable Transport

Several consultees made comments favouring the use of sustainable transport and that waste should be dealt with as close as possible to the source of arisings. Other consultees suggested bulking sites in the main urban areas with sustainable transport links to processing sites in rural areas. Where specific zones were mentioned in the comments, the most common reasons for selecting zones appeared to be in relation to sustainable transport. Some concerns were raised in relation to increasing traffic congestion in urban areas.

Clearly the reduction of transport movements for waste around the County has to be a key consideration when making decisions on the locations of facilities. The possible use of alternatives to road movement should also be assessed in this process.

Specific Sites and technologies

There were positive and negative comments regarding specific technologies or sites. Similar comments were reflected in both questions 1 and 2.

The strategic objectives are favourable to measures aiming to treat waste as a resource and reduce the amount of residual waste that is produced. These comments will be considered in future documents when specific sites or technologies may be discussed.

Access to recycling facilities/smaller facilities

Consultees were in favour of having access to local recycling facilities and some consultees felt that more than one strategic site would be more sustainable.

The comments made will be considered as now the WCS will move forwards containing strategic site.

Areas of search

In addition to comments already highlighted, some people suggested using the whole county as an area of search and potentially creating a criteria base for determining site suitability.

The comments made will be considered as now the WCS will move forwards containing strategic site.

Environmental constraints or worries

Concerns were raised in relation to developing on floodplains and in the greenbelt.

The comments made will be considered as now the WCS move forwards containing strategic site.

Figure 12: Sex

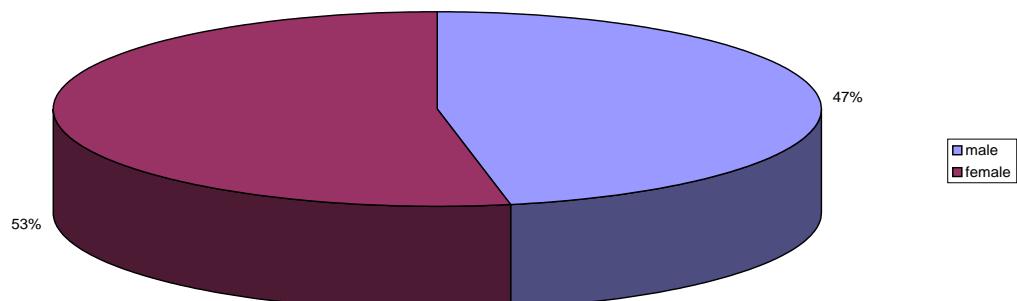


Figure 13: Age

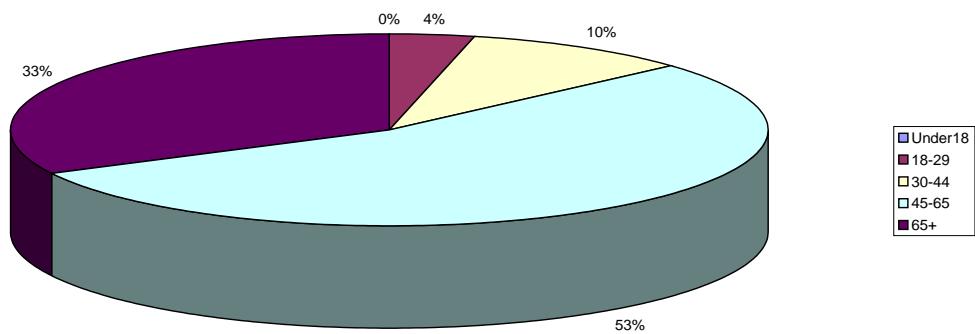
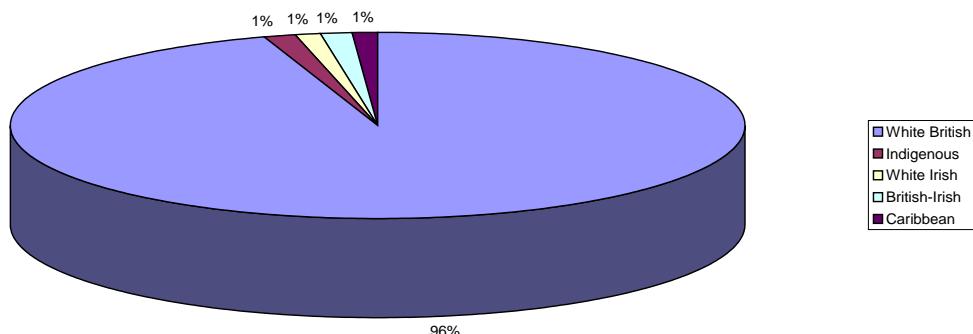


Figure 14: Ethnic Origin



Summary of general comments & GCC response

Structure of questionnaire

Comments were made that the questionnaire was poorly worded, contradictory, difficult to understand, not in plain English, also that the diagrams were too small.

These comments will be passed to our Communications team who compiled the questionnaire. These responses will be taken into account in future communication/consultation processes.

Type of paper

Consultees were concerned that the paper used to produce the questionnaire was too shiny, difficult to write on, non-recyclable and questioned whether the paper was recycled.

These comments will be passed to our Communications team who compiled the questionnaire. These responses will be taken into account in future communication/consultation processes.

Diversity monitoring

A few consultees felt that the diversity monitoring was inappropriate or unnecessary. One consultee suggested that when discussing waste issues, asking the size of the household would be more appropriate.

These comments will be passed to our Communications team who compiled the questionnaire. These responses will be taken into account in future communication/consultation processes.



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