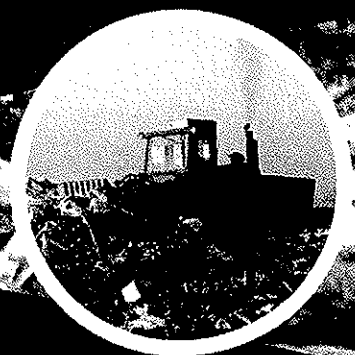


# *Gloucestershire* **Waste Local Plan** 2002 - 2012

## *INSPECTOR'S REPORT*



INSPECTOR:

Christopher Jarvis

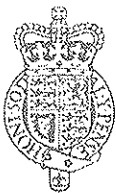
Waste MIMgt, MRTPI,

Gloucester



August 2002





# The Planning Inspectorate

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The Chief Executive  
Gloucestershire County Council  
Shire Hall  
Gloucester  
GL1 2TH

Your Ref:

Our Ref: PINS/T1600/429/4

Date: August 2002

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Dear Madam,

## PUBLIC INQUIRY INTO OBJECTIONS TO THE REVISED DEPOSIT DRAFT OF THE GLOUCESTERSHIRE WASTE LOCAL PLAN 2002 – 2012

1. I was appointed by the Secretary of State for Transport, Local Government and the Regions to hold a public inquiry into objections to the Gloucestershire Waste Local Plan. As a result of changes in departmental responsibilities I now hold my appointment under the First Secretary of State. The inquiry was held between 6 November 2001 and 9 January 2002. The inquiry sat for a total of 12 days. A pre-inquiry meeting was held on 6 August 2001. During the inquiry period I made a series of accompanied and unaccompanied visits to all of the sites that were the subject of objection.
2. The Plan was placed on Deposit twice as provided for in the Town and Country Planning (Development Plan) Regulations 1999. The Deposit Plan was published in August 2000 and the Revised Deposit in April 2001. The Deposit Plan attracted 2,785 objections and the Revised Deposit 209 objections. By the opening of the inquiry 225 objections had been withdrawn conditionally or unconditionally. During the inquiry a further 16 objections were withdrawn, one of which was conditional. There were 970 representations in support of the Deposit Plan and 207 in support of the Revised Deposit Plan. I have dealt with all of the outstanding objections in my report.
3. I have also taken into account a number of changes suggested by the Officers representing the Council at the inquiry and which are set out in documents WPA 31 and WPA 31a. I believe that these changes were offered to assist me but may not have been the subject of consideration by Council members or placed on public deposit. The Council will wish to bear this in mind when the Modifications to the Plan are published.
4. In my consideration of all objections I have had regard to submissions made by, or on behalf of, the various objectors, supporters and the Council, and to all material considerations including current Government guidance. I have not had regard to any changes in local circumstances since the close of the inquiry and, if there have been such changes, then the Council will wish to take them into account when considering my recommendations. Likewise, the Council will need to take into account any Government advice published between the date of my report and adoption of the Plan.

5. My report follows the order of the Plan and I am grateful to the Council for providing me with a skeleton report that sets out the policy and paragraph numbers to be considered together with the list of objectors and supporters. In order to try to assist objectors, supporters and the Council I have summarised the objections and comments under the relevant policy and paragraph number and then addressed them in my reasoning, conclusions and recommendations that immediately follow.

## **Main Issues**

6. The main issues in the report can be summarised as follows:

- (i) ***The place of incineration as a waste management option in the Plan.*** I have supported incineration as a waste management option in the Plan in the face of a substantial number of objections. Given the Environment Agency's role and expertise in regulating waste to energy processes, the potential for improving technology and management over the Plan period, and the balance of evidence submitted to the inquiry, I firmly believe that it would be wrong to exclude this method as an option. It cannot be precluded from being an appropriate method to manage a significant proportion of waste sustainably during, and beyond, the Plan period. In my view the criticisms on health grounds are overstated. The Revised Deposit Plan shows an inconsistency in the Council's approach to incineration as between various preferred sites and I have recommended that this be corrected. I have also recommended amendment to the Plan's policies to ensure that all waste management methods are appraised objectively for their sustainability.
- (ii) ***The adequacy of data for the Plan period.*** I conclude that the quality of data on which the Plan is based is inadequate to reliably assess the current position of waste management in the County, and to predict with any reasonable degree of reliability, the likely arisings, including imports and exports, and the need for facilities in the County during the Plan period. This conclusion of uncertainty echoes that in RPG10 paragraph 9.27 and was recognised in Councillor Dr Cordwell's opening address to the Inquiry (WPA32). My view was further reinforced by the changing character of the data submitted during the Inquiry and by the common view at the round table session on the very first day of the Inquiry that "*reliability of data is a key problem in waste management planning at present*" (CD201rev). This is not the Council's fault and is a common problem. But, if this site specific Plan is to do its job effectively, then its database needs to be improved in consultation with other authorities. I therefore recommend annual review and publication of the data on which the Plan is based for information of all those interested in new facilities and especially to facilitate the establishment of the Best Practicable Environmental Option for new waste development.
- (iii) ***The reliability of site selection for waste management facilities.*** I find that the reasoning for selection of the preferred sites is unclear and I conclude that, when the Plan is reviewed, a value matrix approach should be adopted as recommended in Waste Strategy 2000. This would be publicly auditable and could result in a better list of preferred sites. I particularly find the Plan lacking in its correlation of arisings with types and scales of facilities, except in a very broad and simplistic sense, based upon Gloucester in the centre of the County where facilities are very much concentrated. Cheltenham has remarkably few sites for its size. I do not feel that there is a comprehensive and coherent network and I am particularly concerned at reliance on large sites with historic origins at Sudmeadow and



Wingmoor Farm that seem to have serious shortcomings for strategic waste facilities for the longer term. I recommend a review of arisings around the broad fringe of the County and active co-operation with neighbouring waste planning authorities to achieve a mutually supportive network of waste facilities that will optimise sustainability overall. I feel that the protectionist approach of the County that becomes apparent at times should be resisted. I therefore recommend a reappraisal of sites and facilities when the guidance stemming from the Regional Technical Advisory Body is published which should reflect co-ordination with adjoining regions bearing in mind Gloucestershire's close proximity to them. In the meanwhile I see the preferred sites recommended to be in the Plan as being the best selection identified to date, and as a benchmark against any which other sites can be judged in any BPEO analysis.

I have reflected these views in recommending amendments to the policies of the Plan to enable new sites to come forward and compete with the preferred sites without being at a disadvantage at this early stage of the Plan's evolution. I have also recommended that one omission site (Wilderness Quarry) is included, and one preferred site (Site 11 Myers Road, Gloucester) is excluded, from Schedule 2 of the Plan. I have recommended that Sharpness Docks be reinstated as a Schedule 1 strategic site. I have recommended that the excess of capacity of sites overall in relation to predicted arisings should remain in the Plan to reflect uncertainties in data and predictions and in sites coming forward for development and because of the shortcomings of Sudmeadow and Wingmoor Farm. Because of development pressures, and the need to retain a working reserve of waste management sites for the Plan period, I have recommended that safeguarding of sites be retained as an essential measure.

- (iv) ***Self-sufficiency and need.*** I have recommended that the strong lobby to resist imports of waste, and for the County to simply deal with its own waste, should be resisted. While such a strategy supports the sound principle of self sufficiency, it works against sustainable waste management overall. The BPEO should override administrative boundaries and be the subject of cross border co-operation.

For similar reasons I have concluded that the criterion of "need" for waste development is inappropriate in the Plan's policies, especially limited to the need of the facility simply to deal with Gloucestershire's arisings. I believe this criterion could stifle competition for existing waste management facilities that are not the BPEO; it would be very difficult to establish, given the inadequacies in data and reliability of prediction of arisings; and it would presume against facilities that served a regional or national need and were the BPEO. Removal of the criterion does not preclude a requirement for "need" to be established to justify development that would cause conspicuously harmful effects.

- (v) ***Quality standards in waste management.*** I have recommended that waste management sites at Gloucester Business Park (Site RD3), Dowty, Staverton (Site 9), Forest Vale, Cinderford (Site RD15) and Lydney Industrial Estates (Site RD17) be retained in the Plan despite strong representations that waste development would blight the locality, stifle regeneration and would be very unpopular with residential nearby occupiers. Almost all sites were objected to on grounds of harm to amenity and especially those close to, or within, settlements. I have taken the representations made on the Council's behalf at the Inquiry, that it intends to ensure that environmental standards of waste management facilities are improved

(WPA32), at face value in coming to my conclusions and in making my recommendations. I would be concerned if the efforts of local planning authorities and developers to achieve good environmental standards in developments were undermined by new, and unsympathetic, waste management facilities.

- (vi) *Achievement of the Best Practicable Environmental Option.* Subject to the recommendations I have made, I agree with the Council in its opening and closing submissions (WPA 32 & 32a) that the Plan represents the best that the Council has been able to achieve to date. The Inquiry has helped the Plan to progress towards a framework that represents the best option to guide waste development in a sustainable way. Because things will change with time, and because of the uncertainties that exist, I have concluded that each development should establish that it is the BPEO for the waste stream in question when it is assessed, including preferred sites. With these views in mind I resisted the application by Friends of the Earth (Forest of Dean) for the Inquiry to be adjourned while the Plan was reviewed and revised by the Council to achieve the BPEO (report sections 5.3-4).
7. Although I have criticised the Plan in my report, my comments should be read in the context of this being the first site-specific waste plan for the County during a time of great change as we strive to live in a sustainable way. I believe the Plan represents much hard work and is a very good first step in an evolutionary waste planning process. I feel sure that, with lessons learned from experience, this first Plan will form a sound foundation for sustainable waste management for the future.

#### **Other Matters**

8. I feel I should draw attention to the fact that my recommended modifications to policies in the Plan may also necessitate consequential modifications to supporting text and or the Proposals Maps. These consequential modifications are not necessarily mentioned in my report, and the Council will thus need to identify and incorporate them during the final stages of the Plan preparation process.
9. A complete set of documents submitted in connection with the inquiry has been despatched to your Executive Director (Environment).
10. A copy of this letter has been sent for information to the Government Office for the South West and to the Waste and Minerals Planning Division, Office of the Deputy Prime Minister, Eland House London.
11. Finally, I would like to express my thanks to all participants at the inquiry and to the Council's Officers. All helped to ensure that events ran smoothly and constructively and that I received required information. My deepest thanks inevitably go to Mrs Brenda Powell who, as Programme Officer, managed the administration of the Inquiry in an exemplary manner.

Yours faithfully,

Christopher Jarvis  
Inspector

cc: ODPM; GOSW.

## REPORT CONTENTS

| ITEM  | PAGE                   |
|---|------------------------|
| <b>Letter To The Chief Executive</b>                                  | i to iv                |
| <b>Contents List</b>  | v to vii               |
| <b>Glossary of Terms &amp; Abbreviations</b>                          | viii to ix             |
| <b>PRELIMINARY MATTERS &amp; SECTIONS OF THE PLAN</b>                 |                        |
| <b>General Objections to the Plan</b>                                 | P1-1 to 4              |
| <b>Foreword</b>   | P1-4 to 5              |
| <b>Vision Statement</b>   | P1-5 to 7              |
| <b>Executive Summary</b>  | P1-7 to 8              |
| <b>CHAPTER 1 – INTRODUCTION</b>                                       |                        |
| <b>General Objection</b>  | 1-1 to 2               |
| <b>The Waste Local Plan: Its Context</b>                              | 1-2 to 5               |
| <b>CHAPTER 2 – AIM, OBJECTIVES AND STRATEGY</b>                       |                        |
| <b>Gloucestershire Key Issues</b>                                     | 2-1 to 2               |
| <b>Aim</b>  | 2-3 to 5               |
| <b>Key Objectives</b>   | 2-5 to 7               |
| <b>The Waste Local Plan Strategy</b>                                  |                        |
| The Guiding Principles  | 2-7 to 14              |
| Geographic Statement  | 2-14 to 15             |
| <b>CHAPTER 3 -GLOUCESTERSHIRE'S WASTE - ANALYSIS AND REQUIREMENTS</b> |                        |
| <b>Waste Data and Categories</b>                                      | 3-1 to 7               |
| <b>Gloucestershire's Waste</b>  | 3-7 to 17              |
| <b>CHAPTER 4 - FACILITIES AND PREFERRED SITES</b>                     |                        |
| <b>Waste Management Facilities</b>                                    | 4-1 to 7<br>4-15 to 18 |
| <b>Physical Waste Management Processes</b>                            | 4-7 to 9               |
| <b>Biological Waste Management Processes</b>                          |                        |
| <b>Physio-Chemical Waste Management Processes</b>                     | 4-9 to 13              |
| <b>Waste To Energy Recovery Synopsis</b>                              | 4-13 to 14             |
| <b>Site Selection</b>   | 4-18 to 21             |
| <b>Omission Sites</b>   | 4-21 to 24             |
| <b>RD Schedule 1 List of Sites</b>                                    | 4-25 to 26             |
| <b>General Development Criteria for Strategic Sites</b>               | 4-26 to 27             |

|  |             |
|--|-------------|
| <b>Site Profiles and Site Plans (Schedule 1)</b>               |             |
| Site 1 Wingmoor Farm West, Stoke Orchard                       | 4-27 to 31  |
| Site 2 Wingmoor Farm East, Bishops Cleeve                      | 4-31 to 33  |
| Site 3 Gloucester Business Park, Brockworth, Gloucester        | 4-33 to 34  |
| Site 4 Sudmeadow, Hempsted, Gloucester                         | 4-34 to 40  |
| Site 5 Javelin Park (former Moreton Valence Airfield)          | 4-40 to 41  |
| Site 6 Sharpness Docks   | 4-42 to 51  |
| <b>RD Schedule 2 List of Sites</b>                             | 4-51 to 54  |
| <b>General Development Criteria for Other Sites</b>            | 4-54        |
| <b>Site Profiles and Site Plans (Schedule 2)</b>               |             |
| Site RD3 Gloucester Business Park, Brockworth                  | 4-55 to 59  |
| Site 7 Moreton in Marsh  | 4-59 to 62  |
| Site 8 Phoenix House, Elmstone Hardwicke                       | 4-62 to 63  |
| Site 9 Dowty, Staverton, Gloucester                            | 4-63 to 66  |
| Site 10 Railway Triangle, Gloucester                           | 4-66 to 68  |
| Site 11 Transfer Station, Myers Road, Gloucester               | 4-68 to 70  |
| Site 12 Horton Road, Gloucester                                | 4-70 to 71  |
| Site 13 Netheridge, Gloucester                                 | 4-71 to 72  |
| Site 14 Sudmeadow, Gloucester                                  | 4-72 to 73  |
| Site 15 Forest Vale, Cinderford                                | 4-74 to 77  |
| Site 16 Canal Works, Lydney                                    | 4-77 to 78  |
| Site 17 Industrial Estate, Lydney                              | 4-79 to 86  |
| Site RD18 Wingmoor Farm South East                             | 4-86 to 88  |
| Site RD19 Foss Cross, Calmsden                                 | 4-88 to 89  |
| Site RD20 Old Airfield, Moreton Valence                        | 4-89        |
| Site RD21 Bristol Road, Gloucester                             | 4-89 to 90  |
| Site RD22 Netherhills Pit, Frampton-on-Severn                  | 4-90 to 92  |
| Site RD23 Sharpness  | 4-92 to 94  |
| <b>CHAPTER 5 – POLICIES</b>                                    |             |
| <b>Introduction</b>  | 5-1 to 3    |
| <b>General Policies and Principles</b>                         | 5-3 to 11   |
| <b>Facilities and Operations</b>                               | 5-11 to 34  |
| <b>Environmental Constraints &amp; Issues</b>                  | 5-34 to 44  |
| <b>Development Considerations</b>                              | 5-45 to 57  |
| <b>CHAPTER 6 - MONITORING AND REVIEW</b>                       | 6-1 to 2    |
| <b>PLAN GLOSSARY</b>   | G1-1        |
| <b>PLAN APPENDIX 5</b>   | A1-1        |
| <b>REPORT APPENDIX 1 – LISTS OF OBJECTORS &amp; SUPPORTERS</b> |             |
| Figure 1 – General   | App1-1 to 7 |

|                                    |               |
|------------------------------------|---------------|
| Figure 2 – Paragraph 2.13          | App1-7 to 11  |
| Figure 3 – Chapter 4: General      | App1-11 to 27 |
| Figure 4 – Chapter 4: Incineration | App1-27 to 31 |
| Figure 5 – Chapter 4: Site 3       | App1-31 to 33 |
| Figure 6 – Chapter 4: Site 6       | App1-33 to 43 |
| Figure 7 – Chapter 4: Site 7       | App1-43 to 44 |
| Figure 8 – Chapter 5: Policy 4     | App1-44 to 46 |
| Figure 9 – Chapter 5: Policy 5     | App1-46 to 47 |
| <b>APPEARANCES AT THE INQUIRY</b>  | App2-1 to 4   |
| <b>INQUIRY DOCUMENTS</b>           |               |
| Inquiry Administration Documents   | App3-1        |
| Core Documents                     | App4-1 to 5   |
| Waste Planning Authority Documents | App5-1 to 8   |
| Objectors'/Supporters' Documents   | App6-1 to 7   |

## GLOSSARY OF TERMS & ABBREVIATIONS

|                |  |
|----------------|--|
| AONB           | Area of Outstanding Natural Beauty   |
| BPEO           | Best practicable environmental option  |
| CD             | Core document for the inquiry  |
| DGWLP          | Draft Gloucestershire Waste Local Plan                                       |
| EC             | European Community   |
| EFW            | Energy from waste  |
| EIA            | Environmental impact assessment  |
| GWLP           | Gloucestershire Waste Local Plan   |
| ha             | Hectare  |
| m <sup>3</sup> | Cubic metre  |
| MRF            | Materials recovery facility  |
| PPG            | Planning policy guidance note  |
| Ramsar         | Refers to the Ramsar Convention on Wetlands of International Importance 1971 |
| RDGWLP         | Revised Deposit Gloucestershire Waste Local Plan                             |
| RTAB           | Regional Technical Advisory Body   |
| RTS            | Round table session  |
| SAC            | Special Area of Conservation   |
| SPA            | Special Protection Area  |
| The Plan       | The Gloucestershire Waste Local Plan   |
| WCA            | Waste Collection Authority   |
| WDA            | Waste Disposal Authority   |
| WPA            | Waste Planning Authority   |
| WTE            | Waste to energy  |
| WTS            | Waste transfer station   |

The abbreviations used for parties making representations to the inquiry are listed on the next page.

## Codes for Objectors' Names as used in Document Referencing

|     |  |
|-----|--|
| APD | Arlington Property Developments Ltd          |
| ASG | Allstone Sand & Gravels                      |
| BFN | Mr B Furniss                                 |
| BJP | Mr B J Price -joint case with A, H & M Price |
| BPC | Badgeworth Parish Council                    |
| BWW | British Waterways                            |
| BWY | Bovis Homes Ltd/Westbury Homes Ltd           |
| CBC | Cheltenham Borough Council                   |
| CRY | Cory Environmental Ltd                       |
| CSN | Mrs C Simpson                                |
| DHS | Mr D Holmes                                  |
| DRW | Mr D Drew MP                                 |
| DTY | Dowty Group plc (now Smiths Group plc)       |
| EAY | Environment Agency                           |
| ESA | Environmental Services Association           |
| FDC | Forest of Dean District Council              |
| FED | Friends of the Earth (Forest of Dean)        |
| FEG | Friends of the Earth (Gloucestershire)       |
| FMC | Federal Mogul Camshafts                      |
| FPC | Frampton on Severn Parish Council            |
| GCY | Gloucester City Council                      |
| GDN | S Grundon (Ewelme) Ltd                       |
| GMR | Mr G M Read                                  |
| HRA | Hempsted Residents Association               |
| HWA | Highways Agency                              |
| JBF | Hon J A Billings-Ferrand                     |
| JWG | Mr J W Gillett                               |
| LLR | Lydney Land Resources                        |
| MDY | Messier-Dowty                                |
| NCW | National Council of Women (Cheltenham)       |
| PCF | P & C Funnell                                |
| RHL | Robert Hitchins Ltd                          |
| RID | Mr A Ridlington                              |
| SBC | Swindon Borough Council                      |
| SDC | Stroud District Council                      |
| SGC | South Gloucestershire Council                |
| SPC | Stoke Orchard Parish Council                 |
| TBC | Tewkesbury Borough Council                   |
| V21 | Vision 21                                    |
| WHP | NMB Group & Porsche Club Great Britain       |
| WPC | Westbury on Severn Parish Council            |





## Preliminary Matters & Sections of the Plan

### P1.1 General Objections to the Plan

#### Comments

*For list of objectors and supporters see Appendix 1: Figure 1*

#### Summary of Objection

*Objections relating to :*

- (i) Incineration -
  - remove incineration from the plan
  - incineration is not sustainable development
  - incineration reduces the recycling initiative
  - effect of incineration on the environment
  - effect of incineration on human health
  - locational considerations
  - technical and information requirements
- (ii) Recycling -
  - inefficiency of present recycling schemes
  - more effort and education should be put into recycling and waste minimisation
  - recycling should be handled in small scale facilities
  - recycling of combustibles should only be undertaken when it is economically worthwhile
- (iii) Other -
  - environmental impacts receive greater prominence than health issues
  - issues relating to the waste disposal contract
  - waste minimisation, education, partnerships – a policy area that is missing
  - inadequate remit concerning land use requirements
  - failure to address County-wide issues
  - importation of waste
  - the need for full traffic assessments
  - the need for greater emphasis on the waste hierarchy
  - economics e.g. financial motivations to reduce waste; taxation etc
  - lack of environmental appraisal
  - problems due to fluidity of national policy
  - timescale of waste plan should be the same as the Structure Plan
  - a summary of the document should be prepared
  - inadequate consultation about the proposals

### Inspector's Reasoning and Conclusions

- P1.1.1 **Incineration.** This topic received the predominant proportion of objections. I deal with it fully in my report at Sections 4.7 and 4.9 (Information Sheets: Incineration with Energy Recovery & Waste to Energy Recovery Technologies) and 4.26 (Site 6 – Sharpness).
- P1.1.2 In summary, although the effluent from incineration contains potentially very harmful elements that need careful and reliable regulation, I do not find that the case is made out for its exclusion as a means of waste disposal if that is shown to be the best practicable environmental option (BPEO) for a particular site or waste facility. The BPEO exercise includes ensuring that a more sustainable waste disposal option, such as recycling, is not displaced and it takes an holistic view of the activities associated with any proposed facility. Transportation details and all environmental impacts would be considered in the analysis. Compared to many activities that make up day to day life for the public at large the degree of risk posed by incineration plants seems to me to be small and within a reasonable

tolerance given appropriate design and location of the plant and its effective management and regulation. Incineration, provided it incorporates energy recovery, is consequently more sustainable in principle than landfill where diversionary targets apply. Some wastes, such as clinical arisings, may be most appropriately disposed of by incineration in any event. Waste to energy facilities are supported by the national waste strategy as a contribution towards sustainable development as a source of renewable energy, reducing the use of fossil fuels and cutting emissions of greenhouse gases. They are expected to play a full and integrated part in local and regional solutions developed over the next few years<sup>1</sup>.

- P1.1.3 I have the clear impression that many objectors are not aware of the relatively small degree of risk posed by modern incineration as compared to many other effluent-creating activities that are accepted by society generally. The campaign against incineration in this local plan seems to me to amount to an attempt to achieve virtually zero risk from this one, targeted, method of waste management. I do not criticise the aim of reducing risk. It is very laudible. But it does not seem a proper balance from a practical viewpoint in the lifetime of this waste local plan to treat incineration in a different, and prejudicial, way to other methods other than through the application of the waste hierarchy (see section 2.17 of my report). New cleaner technologies that could replace incineration, such as gasification, fluidised bed and pyrolysis, are coming forward but are not presently an economic option and have a lead time of 5 years or more. Incineration is not inevitable just because it remains an option in this plan. The plan seeks the best practicable environmental option as technology changes. Mr Meacher, as the responsible Minister, has recognised the potentially harmful effects of incineration, especially its cumulative effects, and the need for further research<sup>2</sup>. Receiving Mr Meacher's evidence, the House of Lords Select Committee on the European Communities endorsed the need for application of the precautionary principle to incineration proposals.
- P1.1.4 I emphasise that my comments concern the principle of the technology and that the detailed design and performance of any plant that is proposed would need to undergo rigorous scrutiny at the planning application stage before it could be considered acceptable. My comments do not prejudge, or pre-empt, such scrutiny. The details of any proposals, probably including an environmental impact assessment for plant exceeding a capacity of 50,000 tonnes per year (strategic sites in Schedule 1 of Chapter 4 of the GWLP), would be available to the public for comment during the planning application process in accordance with present procedures. I deal with the regional dimension at sections 4.10 and 4.26 (Site 6 – Sharpness) of my report.
- P1.1.5 **Recycling.** Recycling and waste reduction are strongly encouraged by the waste local plan and by the Government in Waste Strategy 2000. Reduction of waste is the first Key Objective of the Plan and re-use and recovery is the second (RDGWLP paragraph 2.13). The recently introduced packaging regulations are designed to act as a significant waste reduction measure. Composting schemes accessible to the public are supported by the Plan (eg Policy 9) and it seeks to achieve minimisation during development through Policy 35.
- P1.1.6 The Waste Planning Authority's (WPA) initiative to improve the efficiency and sustainability of dealing with Gloucestershire's waste in partnership with the Waste Collection Authorities, as set out in the Memorandum of Understanding dated 16 February 2001 (WPA 33), is very commendable. This document seeks to ensure that the various waste targets, including those for waste reduction and recovery are met. Given strong support by all Councils and by the public it has great potential. Indeed, I would go further, agreeing with HRA and FEG, that it is vital that all relevant authorities work closely together on these waste issues as advised by the Government in its Guidance on Municipal Waste Management Strategies (March 2001) (CD105). FEG contributes some useful ideas on this (FEG/RTS/2). However, the land-use planning system is limited in its role.
- P1.1.7 Contracts will need to be negotiated with waste targets and aims in mind and practical schemes for waste collection and disposal introduced or extended expeditiously. Because

<sup>1</sup> Waste Strategy 2000 Part 1 paragraphs 2.22 & 2.23 & Part 2 paragraphs 5.55 & 5.57

<sup>2</sup> House of Lords Paper 71 dated 15 June 1999

the performance of waste disposal and achievement of its aims are directly affected by the work of waste collection, I feel it is appropriate and reasonable for the Waste Local Plan to contain a policy relating to it from a land-use viewpoint. The Memorandum of Understanding (WPA 33) provides a useful guide to the nature of such an important area of County wide waste policy and I suggest an outline of a possible policy below.

- P1.1.8 **Other.** The impact of waste facilities on human health is a specific factor considered in licensing on the occasions that a waste licence is required. Whether a licence is required or not, where health, or other factors such as traffic generation, have material land-use consequences they will be considered in the course of assessing a planning application for such a facility (please see section 4.7 of my report). I am confident that the WPA considered health and other impacts in setting out proposed facilities and preferred sites in Chapter 4 even though the site assessments require considerable study to find and comprehend. Even when found, they are not altogether clear and comprehensive (CD11, 12 & 13). I mention this further below at section 2.18 of my report recommending a revision of RDGWLP paragraphs 4.10 to 4.12.
- P1.1.9 In any event, the assessments made for the Plan are only very broad and in principle. It is at the planning application stage, when the details that can be assessed are fully known, that a definitive judgement can be made on the appropriateness of any facility at a particular location. This explanation is set out at RDGWLP paragraph 4.13. The WPA consults the Environment Agency, Gloucestershire Health Authority and the District Environmental Health Officer as appropriate on health issues. The initiative for any facility is with an applicant for planning permission to propose an appropriate scheme. The RDGWLP only sets out the facilitating framework with due regard to national waste policies but this includes specifying adverse impacts of concern such as those set out at paragraphs 5.112 and succeeding policy 36. By avoiding being over-prescriptive, the plan framework seeks to ensure that adequate waste facilities exist and that they are the best practicable environmental option. I agree with the WPA that over-prescription is likely to lead to the plan soon becoming obsolete and, subject to my comments elsewhere in my report, that the RDGWLP generally provides appropriate guidance.
- P1.1.10 The approach to the identification of sites and meeting waste requirements was started by Policy Panels set up by the County Council to give officers guidance through the Environment Committee as described in WPA 5. These Panels comprised wide membership and a spectrum of opinion including industry representatives, environmental groups, the Environment Agency and District and County Councillors. Their meetings were held in public and, on occasion, public contributions to meetings were permitted. The minutes of meetings of the Panels and Environment Committee were published and those relevant were produced for the inquiry (CD 11, 12 & 13).
- P1.1.11 Although the Panels have, in my view, done good work in producing sites for this first waste plan for the County, I consider that those who question the procedure adopted for site selection have a point. RDGWLP paragraphs 4.8 to 4.13 are not sufficiently clear and comprehensive. The general approach has probably served the County quite well at this stage of the Plan's evolution. However, I believe it would have been better for the public (and so for me) in terms of transparency, and probably for the plan result, if a value matrix system had been used by the Panel for site selection. I commend the approach set out in Waste Strategy 2000 Part II paragraphs 3.9 and 3.10 and illustrated, for example, by objectors to the allocations at Gloucester Business Park (Site RD3) and Staverton (Site 9) in their inquiry submissions. This approach would have given the public and me a better understanding of the WPA's view of the relative merits of various sites, including omission sites, in a comprehensive and readily understood form. It would have helped to ascertain some consistency with BPEO at a strategic level. I note that matrices were used by consultants in Chapter 6 of the Revised Deposit Draft GWLP Strategic Appraisal (CD 09) to secure optimum sustainability. I comment further on site selection at sections 2.18, 3.10 and 3.15 of my report.
- P1.1.12 The negotiating and signing of waste contracts is outside the scope of my inquiry except that it would be reasonable to expect that contracts made by the WPA will reflect the

requirements of national and local waste policies as set out in the Waste Local Plan when adopted. I have no cogent evidence that a departure from this principle has occurred or that the plan has been pre-empted by any contractual arrangement by the WPA. The provision of financial incentives and adjustments to the tax regime are also outside my remit even though they may have merit.

- P1.1.13 There are criticisms of the opportunities to comment upon the DGWLP and RDGWLP. I am assured by the WPA that the statutory requirements for the plan, that include provision for public participation, have been complied with. The Statement of Public Participation and Consultation (CD10) sets out details. My observation of the process is that the plan received widespread publicity during its gestation and that no-one has been denied a fair opportunity to put their point of view to the WPA and, if desired, to me. Advertising included a week's promotion on commercial radio, a full page advertisement and questionnaire in local newspapers and doorstep opinion surveys. The Programme Officer went to great pains to ensure that all objectors were fully informed about the inquiry process and no objector was denied an opportunity to make a submission to the inquiry.

## RECOMMENDATIONS

- P1.1.14 Retain incineration in the Plan as a waste disposal option where appropriate.
- P1.1.15 Consider the following draft policy to co-ordinate with, and give guidance to, Waste Collection Authorities in order to achieve Waste Disposal aims:
- “Permission will be granted for waste management facilities that assist Waste Collection Authorities to collect, recover, recycle, divert and dispose of waste in an efficient and sustainable way.”
- “In order to achieve sustainable waste management in Gloucestershire the Waste Planning Authority will:
- Exchange relevant, accurate and timely waste data with other authorities; and
  - Negotiate, monitor and review waste management contracts to achieve the BPEO; and
  - Promote waste minimisation, recovery and recycling of waste.”
- P1.1.16 Employ multi-criteria analysis in reviewing sites for the Waste Local Plan.

## P1.2 Foreword

### Comments

| Comments . | Status (See Key) | Name                                   |
|------------|------------------|--|
| 88713/4    | DO               | Friends of the Earth (Gloucestershire) |
| 62569/32   | DS               | Environment Agency                     |
| 62569/4    | DO               | Environment Agency                     |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

Objections relating to :

- (i) There is a clear history of alternative information about waste from the industry
- (ii) The statement about the costs of recycling or recovery is confusing
- (iii) Delete 'of the' from the third paragraph line 5 (*editorial – corrected in the RDGWLP*)

## Inspector's Reasoning and Conclusions

- P1.2.1 The technology of waste disposal has been, and is now, changing substantially as time progresses. There is an increasing body of information on waste technology. Furthermore, as was clear from the Round Table Session on data, there is much more that needs to be done to obtain the data necessary for sound waste planning. The fourth paragraph of the Foreword could be better worded to reflect this.
- P1.2.2 The costs of recycling seem to me to be inherently variable and are the subject of argument. There are indicative costs modelled in Waste Strategy 2000 at Part II Appendix C. However, assumptions need to be made for such modelling and parameters will vary for differing situations. Again, the fourth paragraph of the Foreword would seem better if reworded to reflect this.

## RECOMMENDATIONS

- P1.2.3 Reword the first sentence of the fourth paragraph of the Foreword to read "The Plan has been produced at a time when waste technology is changing rapidly and when the data on waste is incomplete and needs to be improved."
- P1.2.4 Replace the second sentence of the fourth paragraph of the Foreword by: "Guidance and information on the subject of waste from both national government and the European Union is also progressively emerging and the full costs of recycling and recovery costs are not entirely clear. Nevertheless, it is important that the Waste Local Plan is produced using the best information available."

## P1.3 Vision Statement

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 62569/4      | DO               | Environment Agency                     |
| 88713/5      | DO               | Friends of the Earth (Gloucestershire) |
| 88756/2      | DO               | Living Green Centre                    |
| 90096/1      | DLS              | Rice Phil Mr                           |
| 89726/1      | DO               | Lister Janet Ms                        |
| 65979/17     | DO               | Lafarge Redland Aggregates Ltd         |
| 65979/16     | DO               | Lafarge Redland Aggregates Ltd         |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

Objections relating to :

- (i) Waste minimisation should be the priority
- (ii) Mismatch in objectives between the Vision and paragraph 2.13
- (iii) Query the time-scale of the vision statement
- (iv) The plan should restrict inappropriate infrastructure and should regulate rather than encourage development
- (v) BPEO needs to be implicit in the contract tendering process
- (vi) Facilities should be permitted only if they cause the least environmental impact
- (vii) Incineration should not be a benchmark for other options
- (iv) Page (v) – health risks may be connected with recycling and reusing EfW ash
- (viii) Householders and businesses should accept more responsibility for waste
- (ix) Recovery from incineration processes should not be carried out.
- (x) Landfilling of voids is valuable and sustainable.

- (xi) An objective, rather than political, approach to waste is needed.

## Inspector's Reasoning and Conclusions

- P1.3.1 Waste minimisation is a priority in the Plan. See my comment at P1.1.5 above. Nevertheless, I agree with FEG that it is logical, and more consistent with the Key Objectives in paragraph 2.13 of the Plan, if it features as the first bullet point. Arisings occur after minimisation takes effect. Reflecting this priority, reference to it could also usefully be brought to the beginning of the text beneath the highlighted box.
- P1.3.2 The Vision would seem more complete and focused if reference is made to the plan period.
- P1.3.3 I believe the RDGWLP has a role in both regulating and encouraging waste development. The Plan seeks to meet the requirement for adequate waste facilities. It also needs to ensure that those facilities achieve the BPEO. A policy framework therefore needs to be established that is permissive of factors favourable to those ends and unfavourable to those factors that conflict with them. The RDGWLP seems to me to seek to achieve such a framework.
- P1.3.4 I have referred to the place of the contract tender process above. I see no need to require more than BPEO provided the concept is rigorously applied. The concept needs to be wider than environmental impact in order to ensure that adequate facilities are provided. Unfortunately, cost and other practicability factors, mean that compromises may be necessary in relation to the ideal environmental solution. Waste development, including recycling, is unlikely to be without some material environmental impact. Incineration is one of many disposal options that I believe should be considered, not as a benchmark, but with the object of achieving the BPEO in an open-minded way. The reference to this in the Vision statement could be amended to avoid misunderstanding. The reference in the Vision statement that the incineration plants would run on materials that cannot be recycled adequately deals with FEG's point in this part of the Plan that recycling should not be undermined by waste to energy plants unless BPEO can be established. Recovery and disposal of residues will need to satisfy the BPEO for any proposed facility.
- P1.3.5 It is right that the public at large need to be educated and involved in implementing waste policy and the vision statement makes reference to this in a number of places. The importance of public involvement could be emphasised more strongly and this might be achieved by additional comment at the end of the statement along the lines I have proposed below.
- P1.3.6 The omission of the role of landfilling was corrected on page iv of the revised plan.
- P1.3.7 The suggestion that objectivity in the WPA's decision-making should clearly be part of its Vision seems to me to be unlikely to add anything materially to the Plan if it were to be inserted.

## RECOMMENDATIONS

- P1.3.8 **In the highlighted box at the start of the Vision Statement place minimisation as the first bullet point.**
- P1.3.9 **Bring reference to waste minimisation to the beginning of the first paragraph from the second paragraph.**
- P1.3.10 **Delete the "benchmark" sentence on page vi. Amend the previous sentence to read "It addresses the possibility that new waste to energy incineration plants meeting modern regulatory standards may be the most cost effective and least environmentally damaging option for Gloucestershire in certain circumstances compared to other methods of disposal."**



- P1.3.11 Add the plan period into the highlighted box at the beginning of the statement by inserting “for the period 2002 – 2012” after “Gloucestershire’s vision”.
- P1.3.12 Add at the end of the vision statement “Dealing effectively with the County’s waste needs the support and involvement of everyone. It is our collective problem to resolve and we will work with you to resolve it.”

## P1.4 Executive Summary

### Comments

| Comments No. | Status (See Key) | Name                           |
|--------------|------------------|--------------------------------|
| 62569/4      | DO               | Environment Agency             |
| 61775/2      | RDO              | Prestbury Parish Council       |
| 99020/1      | RDO              | Chaplin S M Mrs                |
| 65979/13     | DO               | Lafarge Redland Aggregates Ltd |
| 65979/12     | DO               | Lafarge Redland Aggregates Ltd |
| 61775/1      | DS               | Prestbury Parish Council       |
| 65979/19     | DO               | Lafarge Redland Aggregates Ltd |
| 65979/18     | DO               | Lafarge Redland Aggregates Ltd |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

Objections relating to :

- (i) Key objective No.7 – the revised deposit version is too weak in environmental protection
- (ii) Page (xvii) – sites not included in the plan should be automatically excluded
- (iii) Page (xv) final paragraph – clarify that ‘other sites’ means those not identified in the plan
- (iv) Where is the ‘500,000 tonnes’ of waste capacity is derived from?
- (v) First paragraph – landfill should be included before landraising (actioned in RDGWLP)
- (vi) First paragraph of ‘Gloucestershire’s Waste Plan section – prior to a site being developed, planning permission is required
- (v) Page (xiii) – guidance is needed about encouragement from the WPA for new or enhanced facilities
- (vi) Page (xiv) – define the boundary of the regional influence

### Inspector’s Reasoning and Conclusions

- P1.4.1 The wish to strengthen **environmental protection** more than “to minimise adverse effects” seems likely to me to result in inadequate waste facilities in the County and runs contrary to the national strategy, and the Plan provisions in Key objective 4, for facilities to achieve BPEO. I see no need for change.
- P1.4.2 As I have commented at P1.1.10 and sections 2.18 and 3.10 of my report, it is not entirely clear from the **sites selection** process that the best sites in the County have been selected. In any event, some sites are likely to be better for certain facilities than others. Furthermore, owners of some sites may not wish for them to be developed for waste and some operators may not wish to operate certain facilities. The process has many variables. To exclude sites from consideration not selected and identified in the RDGWLP could deny the County of the best range of waste sites. Such a policy would also fly in the face of planning legislation that permits an applicant for planning permission to have his application considered on its merits. The important point is that any site not selected in the Plan would need to demonstrate, against the provisions of the GWLP, that it deserved to be granted permission. I therefore see no need for change.

- P1.4.3 The reference to **“other sites”** on page xv of the Deposit Plan has been amended in the Revised Deposit version. However, that introduces some confusion because the non-strategic sites selected in the Plan are also called “other” sites. This could be resolved by calling the non-strategic sites “local” or “district” sites throughout the Plan including in the table on page xvii of RDGWLP. Please also see section 4.10 of my report.
- P1.4.4 The reference to facilities with a capacity of **50,000 tonnes per year** on page xvi of the RDGWLP could be clarified in the Plan. This figure derives from the Town & Country Planning (Environmental Impact Assessment) (England & Wales) Regulations 1999 [SI 1999 No.293] and amplification in Circular No.2/99 (Environmental Impact Assessment) paragraph A36. A facility below 50,000 tonnes capacity per year may not require an EIA depending upon potential impact. It is an indicative figure. The criterion of 50,000 tonnes per year has been selected by the WPA to differentiate between strategic and non-strategic sites in Schedules 1 and 2 of Chapter 4 of the Plan. The paragraph after the 2 parts of the Strategy of the RDGWLP on page xvi could be amended to briefly explain this. Please also see section 4.10 of my report.
- P1.4.5 The RDGWLP makes clear at the beginning of the 4<sup>th</sup> paragraph that **planning permission** is required before waste facilities can be developed. This seems adequate to me, particularly in the Executive Summary and I see no need for further explanation.
- P1.4.6 The initiative for providing new or **enhanced facilities** seems to rest with the waste industry. However, the framework provided by regulatory standards together with policies driven by the need to meet waste targets and to achieve BPEO act as a constraint. By setting out constraint policies together with identification of preferred sites and facilities, the Plan seems to me to provide sufficient encouragement from a land-use planning viewpoint. This seems to be explained sufficiently in the last paragraph of RDGWLP on page xiv.
- P1.4.7 I agree with the Environment Agency that **regional self-sufficiency** in Key Objective 4 needs some explanation, particularly as regional strategy awaits the deliberations of the Regional Technical Advisory Body. I also agree that the Plan should recognise the need to contribute to regional self-sufficiency without pre-empting the RTAB's eventual strategy or by taking an unreasonable share of the region's waste. I suggest that this explanation is best placed after the Key Objectives by adding to the reworded paragraph explaining strategic and local facilities.

## RECOMMENDATIONS

- P1.4.8 Amend “Other Sites” in the Table of preferred sites to read “District” (or “Local” Sites” and as appropriate throughout the Plan.
- P1.4.9 Amend the paragraph below the 2 parts of the Plan Strategy to read “The Waste Local Plan identifies a need for a small number of appropriately located larger scale waste management facilities with capacity in excess of 50,000 tonnes per year that are strategic to the County and a network of smaller facilities (less than 50,000 tonnes per year) that will be more local in nature.”
- P1.4.10 Add to the above amended paragraph: “The designation of any waste facilities to serve our region awaits receipt of the regional strategy from our Regional Technical Advisory Body.”

## Chapter 1

### 1.1 General

#### Comments

| Comments No. | Status (See Key) | Name               |
|--------------|------------------|--------------------|
| 62569/5      | DO               | Environment Agency |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

#### Summary of Objections

- (i) Waste needs to be identified as a problem as well as a resource

#### Inspector's Reasoning and Conclusions

- 1.1.1 During the course of the inquiry the comment was frequently made that standards of waste management need to be substantially improved. Low standards are often a problem. This is a crucial factor if landowners are to be prepared to make their land available for waste facilities and for waste facilities to be located in the most sustainable way. This problem therefore merits a mention at this point in the plan.
- 1.1.2 WPA 31 suggests amending 1.4 million tonnes to 1.3 million tonnes to reflect updated data. This correlates with my recommended amendment to paragraph RD 3.13 of RDGWLP and is therefore supported.

#### RECOMMENDATIONS

- 1.1.3 Add to the end of paragraph 1.2 "Waste management standards must also improve to achieve better public acceptability and sustainability."
- 1.1.4 In the first line of paragraph 1.1 of RDGWLP amend "1.4" to read "1.3".

### 1.2 Table No 1.1

#### Comments

| Comments No. | Status (See Key) | Name               |
|--------------|------------------|--------------------|
| 62569/6      | DO/W             | Environment Agency |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

#### Summary of Objections

- (i) ~~The Environment Agency also has an 'educational role' in the fields of waste minimisation and sustainable development.~~

### 1.3 Paragraph 1.4

#### Comments

| Comments No. | Status (See Key) | Name               |
|--------------|------------------|--------------------|
| 62569/7      | DO/W             | Environment Agency |

|         |    |                                 |
|---------|----|---------------------------------|
| 62613/2 | DO | Hempstead Residents Association |
|---------|----|---------------------------------|

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

- (i) Facilities for storage should be added to those of treatment and disposal.
- (ii) The Plan fails to be sufficiently specific and detailed.

## Inspector's Reasoning and Conclusions

- 1.3.1 As I have commented elsewhere in my report (eg P1.1.8) the Plan has a difficult task to remain relevant and cogent in a changing world. It needs to encourage the right sort of development to come forward with sufficient capacity to meet the County's needs whilst ensuring that unsustainable development does not take place. It also has a problem with reliability of data and projections but these data will be reviewed annually (see RDGWLP paragraph 3.3 and sections 3.9, 3.10 and 3.15 of my report). I feel it strikes a good balance through its policies and identification of preferred sites and range of facilities. It recognises the reality that it is for waste operators to come forward with proposals to achieve BPEO. HRA accepts the nature of the planning regime. If the Plan were more specific and detailed I fear it would become outmoded over the 10 year period and would not achieve its objectives. I believe the Plan has taken a huge step to identify sites in the way that it has. This Plan may not be ideal and has room to improve in the future but I believe it marks substantial and impressive progress in the evolution of waste planning for the County.

## RECOMMENDATION

- 1.3.2 No change to paragraph 1.4 of the Plan.

## 1.4 Paragraph 1.6

### Comments

| Comments No. | Status (See Key) | Name           |
|--------------|------------------|----------------|
| 62013/7      | DO               | English Nature |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

- (i) The WPA's duties under the EC Birds Directive and Conservation (of Natural Habitats &c) Regulations 1994 should be more clearly specified.

## Inspector's Reasoning and Conclusions

- 1.4.1 I feel that English Nature has a point. The Plan should not exclude reference to nature conservation as part of "The Context" for the GWLP when other factors are mentioned. Nature conservation is sufficiently important to form the subject of European legislation that affects the siting and operation of waste management plants. This introductory section of the Plan should therefore go beyond reference to the legislation listed in Appendix 1 of RDGWLP of the Plan as suggested by the WPA. The list at Appendix 1 could also usefully include further relevant legislation for completeness.
- 1.4.2 Policy 22 lists Ramsar, Special Protection Areas and Special Areas of Conservation as requiring special protection. The policy would read better if it was made clear in paragraph 5.87 that all conservation designations listed merit special protection in their own right and that the WPA has obligations in that respect. The publication of the GWLP forms part of the

County's Council's duties as a competent authority. Its other role as decision-maker is implicit in the conservation Policy 22. No further clarification seems necessary.

## RECOMMENDATIONS

- 1.4.3 Delete the second and third sentences of paragraph 1.6 and insert "Nature conservation is also an important factor, particularly in the Severn Estuary. A number of relevant European Directives are listed at Appendix 1 to this Plan that are likely to influence the siting and operation of waste management facilities."
- 1.4.4 Add to Appendix 1 "The Birds Directive (79/409/EEC)".
- 1.4.5 Amend paragraph 5.87 as per section 5.45 of my report.

## 1.5 Paragraph 1.7

### Comments

| Comments No. | Status (See Key) | Name                     |
|--------------|------------------|--------------------------|
| 62569/8      | DO/W             | Environment Agency       |
| 61775/2      | DO               | Prestbury Parish Council |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) — Correctly identify that the site lies immediately adjacent to the Severn Estuary SSSI (also a Ramsar, SPA and under consideration as a SAC)
- (ii) — Reference to existing water borne transport infrastructure and Lydney Docks is not appropriate.
- (iii) Reduction of packaging is essential and should be mentioned.

### Inspector's Reasoning and Conclusions

- 1.5.1 The EC Packaging Waste Directive (94/62/EC) seeks to achieve recovery and recycling of packaging materials with reviewed targets. The Directive, and recovery and recycling, are mentioned in the paragraph. A slightly reworded last sentence might clarify the text but it seems unnecessary to go into more detail.
- 1.5.2 WPA 31 suggests adding the explanation, raised at the Round Table Session on data, that the strategy is supported by the Best Value Framework enforced by the Audit Commission. I agree that this is helpful.

## RECOMMENDATIONS

- 1.5.3 Amend the last sentence of paragraph 1.7 to read "Importantly, statutory targets are set, and periodically reviewed, for the reduction of waste to landfill, recycling, composting and recovery".
- 1.5.4 Add to the end of paragraph 1.7 as amended above, "This strategy is supported by the Best Value Framework enforced by the Audit Commission."

## 1.6 Paragraph 1.9

### Comments

| Comments No. | Status (See Key) | Name               |
|--------------|------------------|--------------------|
| 62569/9      | DO/W             | Environment Agency |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) ——— Reference to storage

## 1.7 Paragraph 1.15

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/6      | DO               | Friends of the Earth (Gloucestershire) |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) Waste arisings need to be regarded as a non-renewable resource if sustainability is to be achieved.

### Inspector's Reasoning and Conclusions

- 1.7.1 I see no need for change to this paragraph in the light of the objection. The text supports Figure 1.1, which is essentially an organisational diagram.
- 1.7.2 The point made by FEG is however a valid one, but in the very long term beyond the period of this plan. As reduction and recycling become more effective, the need for waste disposal diminishes. Such data would form part of the assessment of BPEO for, say, a waste to energy plant seeking planning permission. If such a plant were unnecessary or inappropriate, it would not be the BPEO. The arisings data and appropriate waste management methods are considered in Chapters 3 and 4 of the Plan. Please refer to these parts of my report for further detail.

### RECOMMENDATION

- 1.7.3 No change to paragraph 1.15 of the Plan.

## 1.8 Figure No 1.1

### Comments

| Comments No. | Status (See Key) | Name                           |
|--------------|------------------|--------------------------------|
| 62569/10     | DO/W             | Environment Agency             |
| 65979/14     | DO               | Lafarge Redland Aggregates Ltd |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

- (i) ~~Role of the Environment Agency~~
- (ii) Regional influence requires definition within the Plan Context

## Inspector's Reasoning and Conclusions

- 1.8.1 I agree with Lafarge Redland Aggregates Ltd. The role of the Regional Technical Advisory Board will be very important soon, when it is fully established. The Board's decisions and guidance are likely to affect waste Management planning well within the Plan period. I therefore feel this role should be reflected in Figure 1.1 so complementing GWLP paragraph 1.9 and completing the Plan's context.

## RECOMMENDATION

- 1.8.2 Insert the Regional Technical Advisory Board into Figure 1.1.





## Chapter 2

### 2.1 General

#### Comments

| Comments No. | Status (See Key) | Name                                      |
|--------------|------------------|---|
| 62041/6      | DS               | Stroud District Council                   |
| 88713/11     | DO               | Friends of the Earth (Gloucestershire)    |
| 63039/1      | DO               | Vision 21 Waste & Pollution Working Group |
| 62046/1      | DS               | Cheltenham Borough Council                |
| 62073/1      | RDS              | Wiltshire County Council                  |
| 88825/1      | DS               | Weyers Janet                              |
| 88532/1      | DS               | Elworthy Joy                              |
| 62073/1      | DS               | Wiltshire County Council                  |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

#### Summary of Objections

*Objections relating to:*

- (i) Incinerator plants and achievement of BPEO
- (ii) Waste as a fuel being acceptable
- (iii) Incineration of sewage sludge

#### Inspector's Reasoning and Conclusions

2.1.1 An incineration plant, or any other proposed waste management facility, will need to establish that it is the BPEO for that location. This is firmly established by Policy 1 of the Plan and means that the potentially harmful effects of the plant, and public protection, must be considered. Incineration plants will be regulated not only by planning procedures but also by licensing controls of the waste process. As stated elsewhere in my report (sections 4.7, 4.9 & P1.1.2 to P1.1.4), there seems no cogent case to exclude incineration as an option from the Plan. Likewise, if spreading sewage sludge is the BPEO for a particular location in accordance with Policies 1, 3 and 18, rather than incineration, then that should become apparent during the course of an application for planning permission. I do not feel that there is a case for this Plan to exclude any particular waste management option, including incineration.

2.1.2 For the same reasons I do not believe the case is made out to delete waste as a fuel from the Plan.

#### RECOMMENDATION

2.1.2 No change to the Plan as a result of these objections.

### 2.2 Paragraph 2.1

#### Comments

| Comments No. | Status (See Key) | Name                           |
|--------------|------------------|--------------------------------|
| 65979/15     | DO               | Lafarge Redland Aggregates Ltd |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objection

- (i) The percentage of waste landraised needs to be stated.

## Inspector's Reasoning and Conclusions

- 2.2.1 The large proportion of landraising, as opposed to landfilling, seems apparent from the text as drafted. Paragraph 2.2 of the Plan makes clear that both methods are employed in the County. I see no advantage to the Plan in identifying separately the proportions of landraise and landfill. Both methods of waste management are now discouraged in the drive for a more sustainable system as explained in the Plan.
- 2.2.2 The WPA additionally proposes amendments to this paragraph in the light of changes to data in Chapter 3 (WPA 31). These changes are minor and seem uncontroversial.

## RECOMMENDATIONS

- 2.2.3 In the first sentence amend "The majority of" to read "Much of the".
- 2.2.4 In the third sentence amend "A small" to read "An important".

## 2.3 Paragraph 2.2

## Comments

| Comments No. | Status (See Key) | Name               |
|--------------|------------------|--------------------|
| 62569/11     | DO               | Environment Agency |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objection

- (i) Waste is not always a resource

## Inspector's Reasoning and Conclusions

- 2.3.1 The Agency has a point that could be simply covered by slight rephrasing of the text to reflect the fact that residue is sometimes a disposal problem rather than a resource.
- 2.3.2 The WPA additionally proposes amendments to this paragraph for clarification (WPA 31). These changes are minor and seem uncontroversial.

## RECOMMENDATIONS

- 2.3.3 At the end of paragraph 2.2 after "problem" add "and residues for disposal minimised."
- 2.3.4 In the first sentence after "The European Union Landfill Directive" insert "(Council Directive 1999/31/EC)".
- 2.3.5 In the second sentence after "..... National Waste Strategy introduces ..." insert "aspirational".

## 2.4 Paragraph 2.7

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/9      | DS               | Friends of the Earth (Gloucestershire) |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## 2.5 Paragraph 2.8

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/10     | DS               | Friends of the Earth (Gloucestershire) |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## 2.6 Paragraph 2.10

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/7      | DO/W             | Friends of the Earth (Gloucestershire) |
| 97779/1      | RDS              | ETSU                                   |
| 61897/1      | DO               | Westbury On Severn Parish Council      |
| 90096/7      | DLO              | Rice Phil Mr                           |
| 89002/1      | RDO              | Atterbury Clive Perkins & Janet        |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) The Waste Hierarchy needs to be properly reflected and prioritised in this paragraph.
- (ii) Minimisation of detrimental environmental impact is needed.
- (iii) Cost effectiveness is omitted.
- (iv) Use of waste as a fuel is incompatible with the vision.

### Inspector's Reasoning and Conclusions

- 2.6.1 The revision of paragraphs 2.10 and 2.11 in the Revised Deposit version of the Plan clearly reflect recent Government advice in Waste Strategy 2000 Part 1 paragraphs 2.7 and 2.36. RDGWLP also responds to some of the clarifications sought at the Deposit stage of the Plan overcoming objections. The descriptions of waste management methods in Chapter 4 provide more detail.
- 2.6.2 **Minimisation of environmental impact**, the **waste hierarchy** and **cost effectiveness** are relevant issues but are adequately dealt with elsewhere in the Plan. Paragraph 2.8 makes clear that the natural environment and people's quality of life are relevant. The BPEO concept runs right through the Plan, is set out in Policy 1 and the Glossary, and includes cost effectiveness as well as environmental considerations. The waste hierarchy is firmly part of the policy framework and is set out at paragraphs 2.26 – 2.27 and figure 2.1.

2.6.3 The amount of detail in 2.10 seems adequate to me for its place in the Plan. This paragraph needs to be read with other parts of the Plan as a complementary whole. However, the principle of prioritisation would be more apparent if the options were written as alternatives and left open for a later decision on appropriateness.

2.6.4 Use of **waste as a fuel** seems compatible with the vision for the reasons I explain at sections P1.1, 4.7 and 4.9 of my report.

## RECOMMENDATION

2.6.4 Change the text under the second bullet point of paragraph 2.10 to read “put the waste that is produced to good use through increased re-use, recycling, or perhaps a facility for composting or recovery of energy if that is more appropriate in the circumstances.”

## 2.7 Paragraph 2.11

### Comments

| Comments No. | Status (See Key) | Name                            |
|--------------|------------------|---------------------------------|
| 97779/2      | RDS              | ETSU                            |
| 62613/3      | DO               | Hempstead Residents Association |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) Failure of the Plan to adequately specify the County-wide waste process.

### Inspector's Reasoning and Conclusions

- 2.7.1 HRA seems to be seeking a development brief for the County from the WPA that is more detailed and realistic than that set out in the RDGWLP and in Government guidance. HRA also believes there is over-reliance upon incineration at national and County level.
- 2.7.2 Whilst better information and guidance is always welcome, I find that Waste Strategy 2000 and PPG10 provide very comprehensive and recently published guidance. They do so at a time of much change. To my mind Waste Strategy 2000 sets out a “national waste strategy based upon currently available technology”. The strategy is still evolving as Regional Technical Advisory Bodies are formed and will provide regional advice and guidance in due course. Furthermore, the RDGWLP, applying national guidance, makes “provision for progressive redirection as new technology evolves” through the range of waste management options it presents in its schedules and through application of the discipline of BPEO in Policy 1. The RDGWLP may be capable of improvement, particularly in the process of site and facility selection in Schedules 1 and 2 of Chapter 4. Even so, it seems to me to represent a very great step forward by identifying preferred sites and facilities at a time of great change and through its flexibility to adapt during the Plan period. I believe it would be a mistake to be over-prescriptive by defining precisely the optimum facility for any particular location if indeed it was practically possible for the whole Plan period. The evolution of the RDGWLP seems to be “the process” that HRA seeks, even if it does not go as far as HRA would wish.
- 2.7.3 The Plan is also a reflection of the character of our planning and landholding system with its freedoms. The RDGWLP recognises that it is for land owners to bring their land forward and for waste companies to seek to satisfy the County's waste requirements. If land owners and waste firms are not attracted by the provisions of the Plan, then the County's waste will not be efficiently dealt with and targets met. The WPA's powers are limited. The Plan needs to set out the development parameters and, subject to the comments in my report, I believe it does so

in a satisfactory way at this stage of the evolution of waste planning. I have commented on contracts in my report above (P1.1.7 & P1.1.12).

- 2.7.4 I do not feel that the heavy criticism of incineration is justified for reasons explained elsewhere in my report (P1.1.2 to P1.1.4 & sections 4.7 and 4.9). The Plan does not seem to me to particularly favour these plants but treats them in a neutral way so that their merits can be objectively assessed should such a plant be proposed according to the various tests set out in the Plan. This includes proximity to energy users for waste to energy plants, and application of the waste hierarchy, and seems to me to be an open-minded way to achieve the best solution for the people of Gloucestershire. It is the second part of "the process" and not an abrogation of duty. I see no need to change paragraph 2.11 of the Plan.
- 2.7.5 I comment on targets in Chapter 3 below and particularly at sections 3.9, 3.10, 3.15 and 3.16 of my report.

## RECOMMENDATION

- 2.7.6 No change to paragraph 2.11 of the Plan as a result of these objections.

## 2.8 Paragraph 2.13

### Comments

*For list of objectors and supporters see Appendix 1: Figure 2*

### Summary of Objections

#### *General*

- (ii) Absence of cost effectiveness
- (iii) The Plan needs to protect the public from dioxins, heavy metals and toxins
- (iv) Implement Waste Strategy 2000 on incineration
- (v) State the importance of existing waste management facilities

#### *Key Objective 2*

- (i) Incineration with energy recovery comes further down the waste hierarchy than materials recovery

#### *Key Objective 3*

- (i) The Objective is totally inadequate
- (ii) Environmental impact on land use, landscape, biodiversity, resource depletion, pollution and harmful impacts on human health need to be minimised.

#### *Key Objective 7*

- (i) Use of 'minimise' is inappropriate
- (ii) Environmental quality should be improved where possible
- (iii) Revised deposit wording is weak in terms of protecting the environment

#### *Key Objective 9*

- (i) Concern about green field sites
- (ii) Minerals sites should be included as brownfield land.

#### *Key Objective 10*

- (i) Traffic conflict with any regional facility

*Key Objective 12*

- (i) Require that safeguarded sites are temporarily used or at least maintained when vacant.

**Inspector's Reasoning and Conclusions**

*General*

- 2.8.1 **Cost effectiveness** and the need to protect the public from **health risks** form part of the assessment of the Best Practicable Environmental Option for any facility. They are embodied within Key Objective 4. Prevention of health risk is also part of Key Objective 3. It is also a potential factor in Key Objectives 7 and 10. Any identified health risks from incineration or any other means of waste management will be considered when planning permission and waste licensing are being determined.
- 2.8.2 Objective 4 involves application of the waste hierarchy. Paragraph 4.5 of Part 1 of **Waste Strategy 2000** places recycling and composting above waste to energy plants. The place of incineration will therefore be considered according to this hierarchy in any planning application. The Plan does not need to spell this out further in these Objectives as all the principles are in place there to achieve the optimum solution in the public interest. Policy 1 puts this into practice. However, Figure 2.1 of the Plan could usefully include a note to reflect the recovery priorities. This is accepted by the WPA in WPA31a although with a different method of display to that which I propose.
- 2.8.3 To make recognition of **existing waste management facilities** a Key Objective of the Plan could contradict the achievement of Objective 4 – achievement of a more sustainable waste management system. This is because present facilities may not be the best practicable environmental option because of location, waste management method or both. There may be better locations or better waste management methods. Present licensed facilities are recognised in the Plan at RDGWLP Appendix 5 and, where preferred for future waste development, in Schedules 1 and 2 of Chapter 4. There is provision for sites to be put forward for further development under Policy 6. This seems adequate to me subject to my comments and recommendations on objections to the relevant parts of the RDGWLP.

*Key Objective 2*

- 2.8.4 The descriptions of **materials and energy recovery** in Chapter 4 of the Plan make clear what is involved in the 2 processes. My recommended amendment to Figure 2.1 of the Plan also clarifies the priority in recovery processes. Too much detail is unnecessary for the Objectives and would detract from them. The Plan needs to be read as a complementary whole. I therefore see no need to amend this Objective.

*Key Objective 3*

- 2.8.5 There is some tension between achieving the **Best Practicable Environmental Option** and an objective simply to **minimise adverse impact**. Naturally every member of the public wants to secure minimum impact but that may not be the optimum solution in the general public interest in every case. The WPA's revised wording in the RDGWLP strikes me as an appropriate objective. I see it as being strong on protection of human health and environmental quality and not needing amendment.

*Key Objective 7*

- 2.8.6 I do not feel that the omission of "**improving environmental quality**" is a problem from this objective. Firstly, the Objectives all need to be read as complementary to each other in forming the framework. Secondly, Key Objective 3 seeks to preserve or enhance the overall quality of the environment. I read handling, processing, transport and disposal of waste as forming part of "waste management practices" in the context of BPEO. It is also relevant that the activities mentioned in Objective 7 normally cause some adverse effect, such as noise and



disturbance. Minimisation of impact is therefore a more appropriate form of words and could, for example, affect the mode of transport employed for a facility. If that facility was already in operation, but desired some alteration requiring planning permission, the change could result in an improvement in environmental quality. I therefore see no need to amend this Objective despite the WPA's proposed change at WPA31.

#### *Key Objective 9*

- 2.8.7 This objective simply reflects a sustainable approach to the use of land by expressing a preference for certain types of site over green fields that are undeveloped. This preference will be taken into account as one of many factors in determining the best practicable environmental option for a facility. The selection process for preferred sites in RDGWLP Chapter 4 seems to have taken this factor into account.
- 2.8.8 Minerals sites, it seems to me, may well be categorised as brownfield land where they remain active or recently worked. Where they form part of the landscape, they may well not be so categorised. If well located and serviced, quarry voids could be very useful for waste management particularly in preference to greenfield development. This is the thrust of national guidance in PPG10 paragraph A51c. Although each case needs to be considered on its merits, and infrastructure and location factors could be important in determining the BPEO for such sites, the PPG10 guidance suggests that quarry voids should be included as a class in the list for Objective 9.

#### *Key Objective 10*

- 2.8.9 There is no proposal in RDGWLP for a regional facility. Regional facilities await assessment by the Regional Technical Advisory Board, although that does not preclude an appropriate facility being proposed that demonstrably meets BPEO. As I have commented below (see my report sections 2.11 and 3.10), regional facilities may well be selected because of their ability to use rail or water transport rather than road which, in principle, seems more sustainable than road transport. This objective does not therefore need change.

#### *Key Objective 12*

- 2.8.10 I do not believe that the Plan can impose a requirement that safeguarded land should be well maintained or dictate how it should be used. The landowner has freedom to use his land as he wishes subject to planning and other legislation. Policy 7 implements the safeguarding objective by exercising a restrictive planning function during the consultation process of any planning application for a site. This is as far as I believe the WPA can, and should, go in this Plan.
- 2.8.11 To encourage temporary uses on safeguarded land begs the question as to which uses would be acceptable and on what basis. Such development could eventually lead to loss of such land to waste use. There is provision for temporary development in the legislation already and it is open to any applicant to apply for temporary planning permission in any event. I therefore see no need to amend this objective no matter how desirable the aim of the objection.

### **RECOMMENDATIONS**

- 2.8.12 Amend the "Waste to Energy Recovery" box in Figure 2.1 by inserting "(after recycling & composting)" under the box title.
- 2.8.13 In Objective 9 after "industrial land" insert ", quarry voids".

### **2.9 Paragraph 2.15**

#### **Comments**

| Comments No. | Status (See Key) | Name                    |
|--------------|------------------|-------------------------|
| 88823/1      | DO               | Du Pont (UK) Ltd        |
| 62063/2      | DS               | Swindon Borough Council |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) There needs to be more emphasis on waste uses achieving compatibility with existing land uses and recognition of the general incompatibility of waste with other land uses

### Inspector's Reasoning and Conclusions

- 2.9.1 The best practicable environmental option principle takes the impact of waste facility proposals into account. This is set out in paragraph 2.17 of the RDGWLP and implemented by policy 1. If there is a materially harmful impact on other land uses, it will tell against a project. I agree with the general thrust of the objection in as much as it is vital that, if greenfield sites are not to be used, and waste sites are to be close to urban areas where the arisings occur, then waste facilities and the transportation systems that serve them need to achieve a good environmental standard. This is particularly so close to residential locations and in business or industrial parks where environmental standards are relatively high. Gloucester Business Park, that I refer to at section 4.22 of my report, is a particular case in point.
- 2.9.2 There is a valid point in the objection which I feel could best be put into effect by stating in paragraph 2.17 of the Plan the link between BPEO and achievement of the key Objectives such as No. 3.

### RECOMMENDATION

- 2.12.7 Amend the last sentence of paragraph 2.17 of the RDGWLP to read "To apply the methodology in a planning context, it must take into account the relevant Key Objectives of the Plan, economic and social considerations, land use implications, as well as environmental and resource impacts."

### 2.10 Paragraph 2.20

#### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/13     | DO               | Friends of the Earth (Gloucestershire) |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) BPEO does not equate to sustainable waste management.

### Inspector's Reasoning and Conclusions

- 2.10.1 The Plan could do with slight amendment to clarify the relationship between these terms. BPEO describes the outcome of a systematic consultative and decision-making process which emphasises the protection and conservation of the environment across land, air and water. The purpose of the process is to establish the option that provides the most benefits or the least damage to the environment as a whole, at acceptable cost, in the long term as well as the short

term (Waste Strategy 2000 Part 1 paragraph 3.4). This definition should be quoted correctly, albeit in its shortened form, at paragraph 2.17 of the Plan.

- 2.10.2 Sustainable development is defined in “A better quality of life: a strategy for sustainable development for the United Kingdom” May 1999 (HMSO Cmd 4345) as “ensuring a better quality of life for everyone, now and for generations to come”. Four objectives are identified:
- Social progress which recognises the needs of everyone;
  - Effective protection of the environment;
  - Prudent use of natural resources; and
  - Maintenance of high and stable levels of economic growth and employment.
- 2.10.3 From the above it seems to me that BPEO is a procedure or process that, at a given time, seeks to ensure that a proposed development will be, and will remain, sustainable as far as can reasonably be predicted. The GWLP is also limited in its influence to land-use considerations. I propose to reflect that relationship by amending paragraph 2.20 of the Plan.

## RECOMMENDATIONS

- 2.10.4 Paragraph 2.17, delete the second sentence and substitute, “BPEO is defined as the option that provides the most benefits or the least damage to the environment as a whole, at acceptable cost, in the long term as well as the short term.”
- 2.10.5 Add to the end of paragraph 2.19 of the Plan, “The Waste Local Plan process goes as far as it can to establish the BPEO on behalf of the County but the process is limited in how far it can identify sites and waste management options. Technology, arisings and predictions may change and new sites may come forward unexpectedly. Where there are likely to be seriously harmful consequences of waste proposals, including being in conflict with the Plan’s “guiding principles”, the need for the development will have to be established.”
- 2.10.6 Amend paragraph 2.20 of the RDGWLP to read “Gloucestershire County Council is committed to using BPEO as a tool in land use planning, and particularly in waste planning, to ensure that, as far as is practicable, new development is sustainable.”

## 2.11 Paragraph 2.21

### Comments

| Comments No. | Status (See Key) | Name           |
|--------------|------------------|----------------|
| 88190/3      | DO               | Parfitt Alison |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) The proximity principle does not appear to be consistent with designation of Sharpness as a regional waste facility.

### Inspector's Reasoning and Conclusions

- 2.11.1 Application of the proximity principle to Sharpness is addressed in my report under Site 6 of the RDGWLP (sections 4.26 & 4.51). Designation of any regional facilities in the County awaits guidance from the Regional Technical Advisory Board which has yet to formally deliberate (please see paragraph 2.8.9 of my report). Nevertheless, my conclusions on site 6 are that Sharpness may be a candidate as a regional facility. It appears to have good potential. Not least this is because of its ready access to waterways and railways, its situation as a working port capable of handling large quantities of materials, and its spare capacity. As

national guidance in Planning Policy Guidance note 10 (Planning and Waste Management) makes clear, water and rail infrastructure is an important factor in achieving significant environmental and economic advantages.

- 2.11.2 While the distance over the ground between Sharpness and other areas of major waste arisings such as Gloucester and, regionally, say Bristol, are greater than at some other present or potential waste sites, the benefits of the water and rail infrastructure could be substantial. Rail and water transport can carry much larger quantities of waste than road transport, resulting in fewer trips, and would reduce congestion on the roads. Water transport is relatively quiet. The advantages and disadvantages would need to be weighed when, and if, a facility is proposed at Sharpness, or any other location, to see whether it would be the best practicable environmental option. Proximity would be an important factor in that assessment, as stated in RDGWLP paragraph 2.21, as would any advantages of rail and water transport, a point made in RDGWLP paragraph RD2.21. It could be that Sharpness' advantages would outweigh any proximity disadvantages.

## RECOMMENDATION

- 2.11.3 No change to paragraph 2.21 of the Plan as a result of this objection.

## 2.12 Paragraph RD2.21

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 62005/5      | RDO              | Countryside Agency                     |
| 62063/3      | RDS              | Swindon Borough Council                |
| 62043/1      | RDS              | Gloucester City Council                |
| 62637/2      | RDS              | Cory Environmental (Glos) Ltd          |
| 61998/1      | RDS              | British Waterways                      |
| 88713/1      | RDO              | Friends of the Earth (Gloucestershire) |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) Line 5 – insert 'economic' before 'benefit of recovering the waste' and afterwards insert, 'However the negative environmental impact should outweigh the cost benefit in making those decisions.'
- (ii) Transportation of waste over long distances may be a good temporary measure pending better local facilities.

### Inspector's Reasoning and Conclusions

- 2.12.1 This paragraph seeks to explain how, in applying the BPEO methodology, the proximity principle is just that, a principle. Environmental advantage and a more sustainable result may be achieved by employing more efficient modes of transport even though the transportation distances between waste arisings and the process facility may be longer than other options. Please see my report above at paragraphs 2.8.5 (Objective 3), and sections 2.10 (BPEO) and 2.11 (Proximity Principle).
- 2.12.2 I do not see how costs can be subordinated to other considerations as a matter of policy without identifying the source of the necessary funds to deal with the County's waste in the way suggested. BPEO is an objective exercise that applies to the particular circumstances of a facility at the time it falls for consideration. Subordination of costs in the balance will ensure that they are increased and that the exercise is no longer an objective one. It could also result

in a less sustainable option being chosen bearing in mind the costs of railway and water infrastructure. I do not therefore support the proposed amendments.

- 2.12.3 The objective of the Plan is to achieve the most sustainable means of dealing with the County's waste obligations. If waste can be transported to a facility on a temporary basis pending a better option being constructed in the future then this should become clear from a BPEO exercise. Waste plants require substantial investment and they will not be proposed and funded unless the Plan, and planning decisions, provide a practicable framework and a reasonable degree of certainty. I do not think the Plan can go further than it does on this.

## RECOMMENDATION

- 2.12.4 No change to paragraph RD 2.21 of the Plan as a result of this objection.

## 2.13 Paragraph 2.23

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/16     | DO               | Friends of the Earth (Gloucestershire) |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) Transporting toxic residues from incinerators to special waste sites presumes against incineration.

### Inspector's Reasoning and Conclusions

- 2.13.1 The transportation of incinerator residues, and any use of those residues, will be factors to be considered in a BPEO appraisal. Until a particular facility is proposed, the transportation requirements cannot be assessed. This paragraph and section in the Plan seem to explain the position sufficiently clearly and fairly.

## RECOMMENDATION

- 2.13.2 No change to paragraph 2.23 of the Plan as a result of this objection.

## 2.14 Paragraph 2.24

### Comments

| Comments No. | Status (See Key) | Name               |
|--------------|------------------|--------------------|
| 62569/13     | DO               | Environment Agency |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) Clarify the regional demarcations.

### Inspector's Reasoning and Conclusions

- 2.14.1 The Regional Planning Areas are set out, for example, in PPG10 Figure 1. They are precisely quoted in the RDGWLP. I see no reason to change this as I have seen no evidence that the National Assembly for Wales is likely to change the PPG10 regional demarcations.

#### RECOMMENDATION

- 2.14.2 No change to paragraph 2.24 of the Plan as a result of this objection.

#### 2.15 Paragraph 2.25

##### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/17     | DO               | Friends of the Earth (Gloucestershire) |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

##### Summary of Objections

- (i) There is no guidance to prevent inappropriate importation of waste (eg from incinerators).
- (ii) A regional scale facility is contrary to the proximity principle.

#### Inspector's Reasoning and Conclusions

- 2.15.1 As I have explained elsewhere in my report, the presumption that incineration is unacceptable as an option in the Plan is misplaced in my considered opinion (sections 4.7, 4.9 & P1.1.2 to P1.1.4). The availability of special waste facilities will be a factor in assessing the BPEO for any proposed incinerator facility. It is however one of many factors. The Plan explains how the BPEO methodology, and the requirement to show need in appropriate circumstances, will help to manage the pressures of dealing with waste arisings together with the other guiding principles. These principles and methodology apply to regional as well as more local facilities and could result in both exportation and **importation** of waste. However, I do not believe that RDGWLP has gone far enough in selecting waste management locations as I explain at section 3.10 of my report with my recommendations.
- 2.15.2 Achieving the optimum in sustainability involves more than application of the **proximity principle**. Please see sections 2.11 and 2.12 of my report. I see no need to change paragraph 2.25 of the Plan.

#### RECOMMENDATION

- 2.15.3 No change to paragraph 2.25 of the Plan as a result of these objections.

#### 2.16 Paragraph 2.27

##### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/8      | DO               | Friends of the Earth (Gloucestershire) |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

##### Summary of Objections

- (i) Materials and energy recovery need to be differentiated.

## Inspector's Reasoning and Conclusions

- 2.16.1 As this paragraph explains the waste hierarchy and identifies priorities it is logical that it should briefly mention the distinction made in paragraph 4.5 of Part 1 of Waste Strategy 2000 that waste to energy plants will be considered after recycling and composting. This reinforces amendment to RDGWLP Figure 2.1 mentioned earlier in my report at paragraph 2.8.2 (Key Objectives - General) and to RDGWLP paragraph 2.10 at paragraph 2.6.4 of my report.

## RECOMMENDATION

- 2.16.2 After “eg glass, compost and energy.” in paragraph 2.27 insert, “Waste to energy plants will be considered after recycling and composting.”

## 2.17 Figure No 2.1

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/15     | DO               | Friends of the Earth (Gloucestershire) |
| 61885/2      | DO               | Stroud Town Council                    |
| 90096/9      | DLO              | Rice Phil Mr                           |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

Objections relating to :

- (i) Relative priorities in the waste hierarchy, particularly concerning incineration.
- (ii) Landfill with energy recovery is not simply disposal.

## Inspector's Reasoning and Conclusions

- 2.17.1 Figure 2.1 should be amended to show that recycling and composting will be considered before waste to energy recovery (as proposed in my report recommendation at paragraph 2.8.5). This accords with Waste Strategy 2000 Part 1 paragraph 4.5 and is agreed by the WPA (WPA 31a). The merits, or otherwise, of any waste to energy plant, and its place in the hierarchy, will fall to be considered when a planning application is made. Figure 2.1 is very broad and indicative in its structure and reflects an assessment based upon technology at the time of drafting Waste Strategy 2000. Advancing technology could alter the relative positions of waste management options in the hierarchy.
- 2.17.2 Landfill with energy recovery has precedence over landfill without it. Landfill facilities are the final disposal point for waste, even after decomposition, so it seems fair to categorise them accordingly although there is an overlap with recovery when so employed. The targets set by the EC Landfill Directive for the reduction of biodegradable municipal waste, and so methane emissions, also act to relegate landfill in the hierarchy. Nevertheless, as Waste Strategy 2000 makes clear (at Part 2 paragraph 5.95), properly regulated landfill can go some way to mitigating the environmental impact of disposing of waste to land. It is therefore necessary to assess the merits of any scheme proposed once its details are known to see how it fits into the hierarchy and whether it represents the BPEO for that location at that time. Similarly, residue disposal will be part of the BPEO assessment for any incinerator plant that is proposed. I find no cogent evidence to justify altering the disposal part of RDGWLP Figure 2.1.

## RECOMMENDATION

- 2.17.3 Amend the “Waste to Energy Recovery” box in Figure 2.1 by inserting “(after recycling & composting)” under the box title.

## 2.18 Paragraph 2.28

### Comments

| Comments No. | Status (See Key) | Name                           |
|--------------|------------------|--------------------------------|
| 60509/4      | DS               | Grundon (Waste) Ltd            |
| 65979/11     | DO               | Lafarge Redland Aggregates Ltd |
| 88662/2      | DO               | Phelps Bros                    |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) The need to safeguard suitable sites needs to be clear by addition of a 12<sup>th</sup> issue.
- (ii) There is no analysis of the role and potential of existing waste management facilities for the future or justification for the preferred site strategy.

### Inspector's Reasoning and Conclusions

- 2.18.1 **Safeguarding** has been added to the Key Objectives in RDGWLP paragraph 2.13 by the WPA as suggested.

- 2.18.2 I agree that the **selection procedure** for preferred sites and waste management options in the Plan is opaque (please see my report at P1.1.8 to P1.1.11 and section 3.10). I believe that a value matrix approach would result in a transparently better set of preferred sites and options that would be publicly auditable. However, getting the optimum range of preferred sites also requires site owners to put their sites forward to the WPA as some have. Subject to my other comments on the Plan, I believe the RDGWLP comprises a good first attempt at identifying preferred sites for further waste development but that further refinement should take place between now and the 5 year review period. Existing facilities, that are helpfully listed in the Plan, if licensed, at Appendix 5, may well not satisfy the BPEO test. In like manner, there seems no point in a preferred management option and location being selected for the GWLP if it appears, from a broad review, that it is obviously not going to meet the BPEO test. However, this does not displace the requirement to examine BPEO and all other sustainability considerations in detail at the planning application stage as RDGWLP states at paragraph 4.13.

- 2.18.3 Table 2.1 of RDGWLP sets out the geographic statement mentioned in paragraph 2.28. Structure Plan paragraph 12.4.4 also sets out very relevant guidance on how to achieve an integrated County-wide network of facilities embodied in SP policy WM2. RDGWLP paragraph 2.28 item B requires identification and evaluation of the existing network of waste management facilities and identifying sites with spare capacity. This provision would satisfy the second objection if it was carried out and documented. However, Appendix 5 to RDGWLP and its sites plan list licensed facilities, but capacities are not identified and no evaluation is apparent.

- 2.18.4 In WPA 31a the WPA agrees that an explanation of the process for selecting sites and potential uses would be helpful to justify the preferred site strategy and it suggests a form of words. A summary of this text would be appropriate in the site selection part of the Plan but I believe that further work is needed to refine site selection as I have suggested above.

### RECOMMENDATIONS

- 2.18.5 **Refine and publish the site selection process and review preferred sites for the 5 year review stage of the Plan.**



**2.18.6 Delete paragraph 4.10 of the Plan and insert the following:**

“The selection of sites commenced with an investigation of those locations that already suffer, or are allocated in local plans to suffer, some environmental degradation. These sites may already have waste management facilities or be previously developed, have redundant or derelict buildings, or be allocated in plans for industrial uses. Waste facilities would generally integrate better into these types of location. Other factors such as transport infrastructure and environmental designations and sensitivities were also considered in the sifting process. National guidance, such as that in PPG 10 (“Planning and Waste Management”), was applied.

Some 30 sites were assessed by desk-top surveys, expert consultation, visual site appraisal, and through scrutiny by some environmental groups and elected members of District and the County Councils. During the assessment process some sites were removed because of obvious unsuitability or because there were better sites nearby. Some sites were added. Because the sites finally selected may not come forward in the Plan period, more sites were selected than are likely to be required. This flexibility is designed to get the best range of sites for the County as technology and other circumstances change.”

**2.18.7 Add after paragraph 4.12 of the Plan:**

“The Plan seeks to give an indication of what might be acceptable on the preferred sites by way of waste management options, capacity and any amelioration expected. In applying the proximity principle, especially to residential and commercial areas, care has been taken to try to select processes that could be compatible with their surroundings. This includes waste to energy plants that the Government does views as acceptable in principle (Waste Strategy 2000 Part 1 paragraph 2.23). As technology advances, sustainability in waste practices improves, and as facilities and locations are reviewed, preferred management options and preferred site locations may change. Linkages between waste management options, and particularly re-use and recycling, are of particular advantage if transportation requirements are reduced.”

**2.19 Table No 2.1**

**Comments**

| Comments No. | Status (See Key) | Name                    |
|--------------|------------------|-------------------------|
| 62569/34     | DS               | Environment Agency      |
| 62063/1      | DS               | Swindon Borough Council |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit



## Chapter 3

### 3.1 General

#### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 62073/2      | DO               | Wiltshire County Council               |
| 90096/10     | DLO              | Rice Phil Mr                           |
| 61768/6      | DO               | Friends of the Earth (FoD)             |
| 88894/5      | DO               | Holmes Andrew                          |
| 62542/9      | DO               | Environmental Services Assoc.          |
| 88713/21     | DO               | Friends of the Earth (Gloucestershire) |
| 62569/1      | DO               | Environment Agency                     |
| 88713/18     | DO               | Friends of the Earth (Gloucestershire) |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

#### Summary of Objections

- (i) The difficulty of obtaining reliable data and making accurate prediction requires alternative scenarios for provision of facilities.
- (ii) Presentation of information and explanation needs improvement if the Plan is to be understood.
- (iii) Rigorous assessment of future needs is absent.
- (iv) Justification is required for the waste management facilities set out in the Plan.
- (v) Provision of major facilities should not be based upon unreliable data.
- (vi) The Plan needs to explain how agricultural waste will be dealt with.
- (vii) The effect of a waste minimisation programme has not been allowed for.
- (viii) The Plan is unclear on waste importation.
- (ix) Special waste from incineration is not accounted for.
- (x) Council co-operation is required to meet recycling targets.

#### Inspector’s Reasoning and Conclusions

- 3.1.1 The problems of obtaining reliable data, making reliable predictions and assessment or justification of future needs, and setting out the relevant statistics in a comprehensible way are addressed at sections 3.9, 3.10 and 3.14 to 3.16 of my report. I support objections (i) to (iv) on these points.
- 3.1.2 The usefulness of the application of alternative scenarios upon which to base predictions seemed to be broadly accepted at the Round Table Session on data (CD 201 Rev section 5). Monitoring and annual review of targets and data is intended by the WPA in any event. At this stage of the evolution of the GWLP, it seems most appropriate for alternative scenarios to be worked up for the 5 year review of the Plan based upon the WPA’s monitoring and annual review exercises.
- 3.1.3 **Major Facilities.** Provision of any major waste management facilities will be attended by an evaluation of BPEO, and probably need, as per paragraph 5.11 of RDGWLP (please see section 5.3 of my report). The data and forecasts now coming forward, despite their shortcomings, are probably better than has been the case in earlier years and are being rightly subjected to close scrutiny. While decisions should be based upon reliable data, there is also a need for adequate facilities to service the County’s waste requirements and responsibilities. It will be for the WPA to assess any proposal at the application stage, applying caution where data appears to be unreliable, notwithstanding the provisions of this Plan. This reservation is set out at paragraph 4.13 of RDGWLP. Any apparent shortcoming concerning those preferred waste management facilities set out in chapter 4 of RDGWLP

that are also objected to are addressed in that section of my report to the extent that evidence is available at this stage.

- 3.1.4 **Agricultural Waste.** Intensive farming has been brought under the control of the Integrated Pollution Prevention and Control (IPPC) regime by the Pollution Prevention and Control Act 1999 and its implementing Regulations. New intensive units will come under control now but existing units have until 2006/7 before the controls apply. Non-intensive units are not regulated in this way. This legislative change would appear to have a relatively very small impact on the County's waste land-use management planning and so does not seem to warrant any change to RDGWLP. Policy 21 of RDGWLP deals with spreading of waste on agricultural land.
- 3.1.5 **Waste Minimisation.** The predicted effects of waste minimisation have been set out in WPA 1b and incorporated into the relevant parts of chapter 3 of RDGWLP. Section 3.15 of my report relates to over-provision of facilities in the Plan which seems to be a prudent strategy to ensure that waste demands are met in a way that secures the BPEO for the County.
- 3.1.6 **Waste Importation.** I agree with the objection insofar as I have the impression that the preferred sites may have been selected, not entirely in an objective way using proximity to arisings in, and around, the County as a key factor, but simply focusing upon the major, and central, urban areas of Gloucester and Cheltenham and otherwise looking to resist importation of waste. Obtaining adequate data on imports and exports has proved difficult but needs to be improved if the Plan is to work satisfactorily by requiring BPEO to be established. I deal with this further at section 3.10 of my report. Contractual matters for waste are beyond the control of the GWLP but will be influenced by the application of BPEO, and perhaps need, policies in new planning applications for new facilities. Economy in travel costs is an obvious commercial factor often, but not always, consistent with the proximity principle.
- 3.1.7 As WPA 1b explains, it is difficult to predict the amount of **special waste** that is likely to arise from incineration plants as it is unclear what technology will be employed to manage waste during the plan period. This is yet another uncertainty in the statistical basis for the Plan but is inherent in the regime if BPEO is to be achieved. However, bottom ash may well continue to be recovered for re-use, for example as a secondary aggregate, and top ash forms a relatively small part of the total residues. An allowance of 48,000 tonnes per year has been allowed as a recovery estimate for special wastes as a whole. It remains to be seen whether this will be achieved and whether top ash from incineration will be recoverable. In the circumstances I conclude that the omission of special waste from incineration as a specific category does not require any amendment to the Plan at this stage. However, I recommend at sections 3.9 and 3.10 below that the relevant data and predictions that support the Plan are published and updated.
- 3.1.8 **Council co-operation.** I agree with the point and deal with it at paragraph P1.1.6 and recommendation P1.1.15 of my report.

## RECOMMENDATIONS

- 3.1.9 **Implement recommendations P1.1.15, 3.9.8, 3.9.13, 3.10.9, 3.10.12, 3.10.13, 3.14.4 and 3.16.2.**

## 3.2 Paragraph 3.2

### Comments

| Comments No. | Status (See Key) | Name               |
|--------------|------------------|--------------------|
| 62569/14     | DO               | Environment Agency |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

- (i) Information from the Environment Agency relates only to quantities received at licensed sites.

## Inspector's Reasoning and Conclusions

- 3.2.1 It was generally acknowledged by inquiry participants that comprehensive gathering of reliable waste data is difficult at present and is a problem for waste planning. Obtaining data from exempt waste operations is one omission as described in RDGWLP paragraph 3.3. Notwithstanding the minor amendment proposed in WPA 31, it seems to me that paragraph 3.2 should be amended more extensively to clarify the Agency's position but bearing in mind that succeeding paragraphs explain the position further.

## RECOMMENDATIONS

- 3.2.2 Delete paragraph 3.2 and substitute "The Environment Agency supplies information on the quantities of Gloucestershire's waste from licensed sites. Some caution needs to be exercised with waste data generally as, for example, they are incomplete because data are not readily available from unlicensed sites. This problem is recognised and improvements in availability of data will be sought."
- 3.2.3 Amend paragraph 3.3 to complement paragraph 3.2 (see recommendations 3.3.5 and 3.3.6 below).

## 3.3 Paragraph 3.3

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/19     | DO               | Friends of the Earth (Gloucestershire) |
| 90096/11     | DLO              | Rice Phil Mr                           |
| 65979/20     | DO               | Lafarge Redland Aggregates Ltd         |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

- (i) Waste receipts should be required as a condition of planning permission.
- (ii) Exempt sites should be excluded from the calculation of existing disposal capacity

## Inspector's Reasoning and Conclusions

- 3.3.1 Problems of commercial confidentiality are given by the WPA as the reason for not requiring unlicensed sites to provide data when planning permission is required for them. To my mind this is not a good reason when, as the WPA says at RDGWLP paragraph 3.1, good information is essential to sound waste planning. The planning system is public and open other than for particular situations that are provided for in legislation. Applications for planning permission are expected to specify publicly what exactly permission is being sought for so that the land-use implications can be judged by all those potentially affected and by the public at large. This includes providing data on land dimensions and the extent and nature of proposed operations.

- 3.3.2 The production of data, either at the application stage, or subsequently during waste operations, is clearly necessary for waste planning purposes in the County and region. Data production is therefore a land-use function. I accept that operators may prefer to secure confidentiality, but this does not seem sufficient reason to deny essential information required in the public interest. However, the difficulty in imposing a condition requiring data on a routine basis after planning permission has been granted is that, to be lawful, the condition must be relevant to the particular development concerned and not just relevant to the wider planning requirement. The condition also has to meet other tests such as reasonableness. Therefore, although I entirely support the thrust of the objection, the legislation does not currently seem to provide the means to achieve it other than at the application stage if planning permission is required for the waste operation. Thus the only recommendation I can make on this objection is limited to production of data when planning permission is required. I propose to add this as a rider at the end of RDGWLP paragraph 3.2 although I suspect that the WPA requires this information at this stage already in any event..
- 3.3.3 The WPA proposes factual clarification of the explanation of exempt sites in WPA 31 that seems uncontroversial and which I support.
- 3.3.4 As the Plan explains at paragraph 3.3, exempt sites add considerably to the available waste management capacity of the County. This capacity could crucially affect waste development requirements. Just because the legislation grants a licensing exemption does not seem to me to be a reason to exclude them from account. The WPA needs good data. Provided exempt sites are carefully assessed, including the likelihood of the useable capacity coming forward within a given time, I do not see the logic of excluding them. In time information gathering on them may improve and become more reliable. In the meanwhile the WPA has to do the best it can. The amplification of the numbers of licensed and exempt sites proposed in WPA 31 for paragraph 3.13 is helpful to understanding this situation.

## RECOMMENDATIONS

- 3.3.5 Add to the end of paragraph 3.2, as proposed to be amended in my report, "One such improvement is requiring full production of data when planning permission is sought."
- 3.3.6 Delete the second, third and fourth sentences of paragraph 3.3 and substitute: "Licensed sites comprise waste management facilities that are required to obtain a Waste Management Licence under the Waste Management Licensing Regulations 1994 (SI 1056) issued by the Environment Agency. These sites are required by a condition on the licence to send data to the Agency on all wastes that they manage. Sites that do not require a licence, but still manage waste, are called 'exempt sites'."
- 3.3.7 Amend the first sentence of paragraph 3.13 to read: "There are approximately 98 licensed facilities, of which 74 are currently operational, and a further 447 registered exempt sites in Gloucestershire."

## 3.4 Paragraph 3.4

### Comments

| Comments No. | Status (See Key) | Name                           |
|--------------|------------------|--------------------------------|
| 65979/5      | DO               | Lafarge Redland Aggregates Ltd |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) The increase in fly tipping should be reflected.

## Inspector's Reasoning and Conclusions

- 3.4.1 The WPA acknowledges that there are some fly-tipping "hot spots" so it seems fair and right to mention this. It is a problem that the Plan needs to recognise.

## RECOMMENDATION

- 3.4.2 Delete the final sentence of paragraph 3.4 and substitute: "There has also been some localised unlawful fly-tipping. The imposition of the Landfill Tax is believed to have influenced these trends."

## 3.5 Paragraph 3.6

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/20     | DO               | Friends of the Earth (Gloucestershire) |
| 61897/3      | DO               | Westbury On Severn Parish Council      |
| 90096/12     | DLO              | Rice Phil Mr                           |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

- (i) Identify potentially recyclable waste
- (ii) Create convenient facilities for recycling batteries
- (iii) Include asbestos in the list of special wastes

## Inspector's Reasoning and Conclusions

- 3.5.1 As the WPA accepts, identification of potentially recyclable waste would be useful. However, there are substantial practical difficulties in achieving it at present. Better data and progressive life cycle assessment are needed to establish patterns and clarify sources of waste that are recyclable. The topic is likely to arise when the BPEO for a management facility lower in the waste hierarchy is assessed but I do not feel that an alteration to the Plan is justified at this stage.
- 3.5.2 The BPEO for a battery recycling facility involves more than just proximity although that is an important factor. The Plan seeks to achieve a network of convenient facilities, particularly for recycling. The practicability of providing special waste facilities is however, likely to result in few sites. Waste collection arrangements will then be needed to achieve effective and comprehensive battery recycling. The WPA is working on improving this co-ordination with collection authorities as I mention at paragraphs P1.1.6-7 and recommendation P1.1.15 of my report. The Plan does not need further alteration to achieve this.
- 3.5.3 Asbestos is not uncommon and is a special waste. I see no reason why it should not be added to the list as Westbury on Severn Parish Council suggests even though the list is not intended to be exhaustive. This Plan is not the place for the special arrangements for its handling, processing and disposal. This will be the subject of the Waste Management Licence.
- 3.5.4 The WPA's editorial corrections in WPA 31 seem appropriate.

## RECOMMENDATIONS

- 3.5.5 Add “asbestos” to the list of examples of special wastes in the first bullet point of paragraph 3.6 of RDGWLP.
- 3.5.6 Delete the second sentence of paragraph 3.6 and substitute: “Waste can be divided into three basic categories. These are:”
- 3.5.7 In the first bullet point of paragraph 3.6 (Special or Hazardous Waste) insert after “1996”, “( SI 1996 No.972)”.

### 3.6 Paragraph 3.10

#### Comments

| Comments No. | Status (See Key) | Name                |
|--------------|------------------|---------------------|
| 60509/5      | DS               | Grundon (Waste) Ltd |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### 3.7 Figure No 3.1

#### Comments

| Comments No. | Status (See Key) | Name                |
|--------------|------------------|---------------------|
| 88756/9      | DO               | Living Green Centre |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

#### Summary of Objections

- (i) Focus on human actions/attitudes leading to waste generation and not predict and provide.
- (ii) Resource local tracing of waste and local data collection.

#### Inspector's Reasoning and Conclusions

- 3.7.1 The Living Green Centre seeks a pro-active and targeted approach to waste arisings including investing in the conduct of surveys which the WPA feels is the function of the Environment Agency. The Objector sees publication of better data, identification of key stakeholders and waste reduction as actions required, and finds Figure 3.1 misleading in its scale of arisings.
- 3.7.2 I see co-ordinated action by the WPA, Environment Agency and Waste Collection Authorities in partnership with the public and businesses as necessary if the effectiveness of sustainable waste management is to be fully achieved. I have commented on this in paragraph P1.1.6 of my report and have recommended action in paragraph P1.1.15. Minimisation, referred to in my report at paragraphs P1.3.1 and P1.3.8, is Key Objective 1 at RDGWLP paragraph 2.13. I feel that this goes as far as the Plan can at this stage without a clearer proposal being made on how the Plan might be amended.
- 3.7.3 The arisings mountains in Figure 3.1 are not of equal size as the Living Green Centre suggests. They only present a broadly representative picture and, over the Plan period, their scales are likely to vary if the Plan is successful in meeting its Key Objectives. I do not believe the figure is so misleading as to warrant change.



## RECOMMENDATION

3.7.4 No change to Figure 3.1 of the Plan as a result of this objection.

## 3.8 Paragraph 3.13

### Comments

| Comments No. | Status (See Key) | Name               |
|--------------|------------------|--------------------|
| 62569/15     | DO/W             | Environment Agency |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## 3.9 Paragraph 3.14 & RD 3.13

### Comments

| Comments No. | Status (See Key) | Name                |
|--------------|------------------|---------------------|
| 60509/1      | RDO              | Grundon (Waste) Ltd |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

- (i) The County's waste requirements should be made clear.

## Inspector's Reasoning and Conclusions

- 3.9.1 I support this objection as summarised but there are real difficulties for the WPA, firstly in obtaining reliable figures, and secondly in securing reliable predictions during a time of change. Nevertheless, there needs to be set of published waste figures that form the basis for the Plan in meeting targets and determining requirements. The figures need to be used by the WPA and everyone else with an interest in waste as a reference point for assessments in the future. I feel that these data should be set out in an appendix to the Plan. The details published in the Supporting Data to WPA 1 and updated by WPA 1b form the basis for such an appendix. Only certain key data would then need to be referred to in the text of Chapter 3.
- 3.9.2 The Round Table Session on waste data concluded that reliability of data is a problem in waste management (CD 201 Rev). Grundon identifies a list of discrepancies based upon its experience that affect paragraphs RD3.13 to 3.22 of RDGWLP. Cory Environmental and Friends of the Earth Gloucestershire also question some detailed aspects of WPA 1b that affect the predictions made in the longer term (CRY/RTS/1.2 and FEG/W/3). Among unresolved doubts expressed by objectors are the rate of recovery for household waste, waste growth rates, effects of market forces, changes to waste technology and processes, and the basis for recycling targets. PPG10 Annex D describes measures being undertaken to improve data quality. The Environment Agency has produced its "Strategic Waste Management Assessment 2000 for the South West" (CD101) and its "Report for Gloucestershire County Council (June 2000)" with Addendum (CD129 & CD130). The WPA comprehensively reviewed its data during the inquiry, including that produced by the Environment Agency, publishing revised figures in WPA 1b (December update). The Regional Technical Advisory Body will reassess the data in due course. These data in WPA1b are modelled on the suggested framework in PPG10 Annex D Table 1 with additional helpful amplifying tables and text. However, apart from the questions raised in CRY/RTS/1.1 & FEG/W/3, the latest information from the Environment Agency suggests

that other amendments may be necessary to landfill figures and in the light of implementation of the Landfill Directive in 2002 (EAY/RTS/1.2).

- 3.9.3 The data changes to RDGWLP paragraphs RD 3.13 and 3.14 as proposed in WPA 31 are confirmed by WPA 1b and appear to be the best estimate of these figures at the close of the inquiry. Unfortunately, it was not practicable to resolve the discrepancies raised before the inquiry closed due to difficulties experienced by the WPA and the lateness of the FEG written submission. I do not believe that these discrepancies seriously affect the Plan in the short term but could well do so in the future if projections, and the basis for them, are substantially in error as Grundon and FEG point out. I comment on this further at paragraphs 3.9.5 and 3.15.2 of my report.
- 3.9.4 The WPA's proposed changes are to amend the current annual waste figures in paragraph RD3.13 (and paragraphs 1.1 and 2.9) to 1.3 million tonnes per year overall; to 850,000 tonnes disposed of by landfill or landraising; and to 450,000 tonnes either treated or exported from the County; to amend municipal and household current waste figures from 250,000 to 260,000 tonnes for total waste processed; and from 28,000 to 36,000 tonnes for this waste stream recycled or composted.
- 3.9.5 I shall recommend these changes as the best available data but these data generally, and the predictions, require monitoring and further review and updating to resolve possible discrepancies and ambiguity and as a result of legislative changes. I do not find that the challenges to predictions can be unequivocally supported on the basis of the final evidence to the inquiry, but neither should they be set aside. I lack confidence in the general quality of data provided and the predictions made for the long term because of the high degree of uncertainty at present. The WPA's intention to conduct an annual review of data and targets is very sound, and is very necessary in the circumstances, even if review of the Plan as a whole is undertaken every 5 years as advised in PPG10. As the WPA seeks to include need as an integral part of the BPEO assessment, a point I deal with elsewhere in my report (sections 3.15 & 5.3), and sufficient safeguarded sites are required to fulfil the Plan's purpose, it seems reasonable to expect the WPA and other public agencies to produce reliable data to support that purpose. This is all the more important if the best practicable environmental options are to be secured.
- 3.9.6 On paragraph 3.14 of RDGWLP, I agree with the WPA that this would be more appropriately titled by adding "municipal" to "household" waste.
- 3.9.7 I deal with other aspects of data referred to in this comprehensive objection in succeeding paragraphs of my report.

## RECOMMENDATIONS

- 3.9.8 **Add an appendix to the Plan to clearly set out the detailed data relied upon by the WPA in formulating the Plan (eg Supporting Data to WPA 1 updated by WPA 1b).**
- 3.9.9 **Amend the figures in paragraph RD 3.13 to read respectively, "1.3 million", "850,000" and "450,000".**
- 3.9.10 **Amend "1.4" to read "1.3" in the first line of paragraph 1.1.**
- 3.9.11 **Amend "95%" to read "72%" in the third sentence of paragraph 2.9.**
- 3.9.12 **In paragraph 3.14 amend "250,000" to read "260,000" and "28,000" to read "36,000".**
- 3.9.13 **Review data for discrepancies and ambiguity and improve data reliability as far as practicable in consultation with other relevant parties.**
- 3.9.14 **Change the title above paragraph 3.14 to read: "MUNICIPAL & HOUSEHOLD WASTE".**

3.9.15 In paragraph 2.9 line 5 of RDGWLP amend “95 %” to read “65 % (850,000 tonnes per year)”.

### 3.10 Paragraph 3.15

#### Comments

| Comments No. | Status (See Key) | Name                                    |
|--------------|------------------|---|
| 98640/2      | RDO              | Trustees of W. J Liddington (Deceased)  |
| 88797/2      | RDO              | Federal Mogul Corporation               |
| 88713/21     | DO               | Friend's of the Earth (Gloucestershire) |
| 62063/4      | DO               | Swindon Borough Council                 |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

#### Summary of Objections

- (i) Enable calculations of landfill allowed and diverted to be deduced and derivation of other data to be understood
- (ii) Explain the basis of Gloucestershire's convergence with national average waste arisings
- (iii) Cross boundary movements of waste has not been accounted for
- (iv) There is under-provision for recycling and composting

#### Inspector's Reasoning and Conclusions

3.10.1 **Data.** I agree with objectors that an interested party should be able to deduce landfill (and other) projections, targets and assumptions from the Plan. This should be achieved by recommendation 3.9.8 above. The WPA suggests updated amendments to the tables in RDGWLP paragraph 3.15 in WPA 31 in the light of better information. The landfill void space has significantly increased and compaction densities revised, but growth rates and targets were also questioned and some discrepancies identified. These tables should therefore be corrected, reflecting later input in WPA1b, CRY/RTS 1.1, EAY/RTS/1.2 and FEG/W/3 and addressing the queries of Grundon (60509/1) where appropriate. They should also be kept under review in the light of experience as per my report at paragraphs 3.9.2 to 3.9.5 and recommendation 3.9.13. As to the text of the Plan, WPA 31 suggests a helpful and suitable factual amendment to clarify paragraph 3.15.

3.10.2 **Arisings.** An outcome of the Round Table Session on data was that prediction of growth rate for waste arisings is difficult (CD 201 Rev). There was a consensus that there is a case for different growth rate scenarios between 1% and 3% based on recent encouraging trends in the County. The WPA subsequently worked up a variable rate for municipal waste for WPA 1b. The annual monitoring process referred to previously in my report is thus essential because of the uncertainty of data and the unproven nature of assumptions (report section 3.9). On one hand, for example, the County Structure Plan envisages a significant increase in housing construction, so increasing waste production by an assumed amount, while on the other, evolving initiatives on re-use and recycling are assumed to reduce disposal requirements (see report paragraph P1.1.6). It is a further assumption that reduction targets will be met. They could be exceeded. Regional Planning Guidance for the South West 2001 (RPG10) concludes (at paragraph 9.27) that there are significant margins of uncertainty over the exact scale of provision of the various types of management facilities that will be proper and feasible over the next 15 years. Establishing and publishing these data and trends, as I have recommended, is therefore important in order that any new waste facilities that the County requires are identified with sufficient lead time of 5 years or so for planning and construction and that materially harmful facilities are not built unnecessarily.

- 3.10.3 **Import/Export.** Predictions of imported and exported waste are made in the WPA's latest and revised data set in WPA1b that would rectify Swindon Borough Council's observed shortcoming in the cross boundary information contained in the RDGWLP, in principle at least, if published as I have recommended at paragraph 3.9.8 of my report. However, this data is very limited indeed and needs amendment in the light of Cory Environmental's later evidence (CRY/RTS 1.1) identifying an incorrect assumption.
- 3.10.4 As to import or export influencing the Plan's requirements, the network of facilities in Chapter 4 of the Plan is intended to satisfy the County's predicted waste needs. The facilities proposed are stated by the Plan to exceed the predicted overall requirements of the Plan (see the notes to Schedules 1 and 2). However, as acknowledged in paragraphs 2.24 and 2.25 of RDGWLP (regional self-sufficiency), the County's waste obligations extend beyond dealing with the waste it alone generates. I share Swindon Borough Council's concern at the absence of any preferred waste facility in the Plan located in the south and south east of the County, coupled with an apparent lack of cross boundary co-ordination.
- 3.10.5 The Plan seems to have no mechanism for geographically reconciling waste management facilities with centres of population to evaluate how communities in the County could be best served other than by visual inspection of the maps showing licensed and preferred sites. The site selection system for the Plan is presently opaque (report section 2.18). Although WPA 5 paragraph 3.2 and 3.3 suggest that locational criteria have been applied, the documents give a different impression. The list of potential preferred sites seems to have been drawn up from environmental criteria, which are of course vital, and then to simply rely upon BPEO in planning applications. The exception to this is in respect of arisings from Gloucester and Cheltenham that are centrally placed in the County. The maps of licensed facilities in Appendix 5 of the Plan and strategic and "other" sites in Chapter 4 are clustered around Gloucester and Cheltenham leaving Stroud and Cirencester and their surrounding areas, and the west of the County, seemingly poorly served. If this is a correct conclusion, the Plan does not accord with Structure Plan (CD 4) policy WM2 (primary & secondary facilities) and paragraph 12.4.4, or with policy WMP3 (proximity) of the Waste Management Strategy for Gloucestershire (1997) (CD14).
- 3.10.6 The County Waste Management Strategy refers often, and rightly, to the GWLP as the place where required facilities are provided for. However, RDGWLP lacks a transparent link between population needs and achievement of good proximity in its range of preferred primary and secondary sites. This exercise should also apply across administrative boundaries per RPG10 and PPG10. An outcome of the Round Table Session on data was that an appropriate range of strategically placed facilities would be necessary to meet targets. The County's Municipal Waste Strategy (CD131) goes some way towards focusing on community needs for that waste stream but is in draft and needs formal input into the Local Plan when appropriate.
- 3.10.7 The Regional Technical Advisory Bodies have not published their guidance at this stage but that does not seem to me to mean that regional self sufficiency should be put aside now. PPG10 (September 1999) paragraph 6b seeks to ensure that future waste management decisions are based upon this principle. RPG10 paragraph 9.30 and policy RE5 firmly require cross boundary co-operation now. This up to date guidance seems to me to be in tension with policy WMP3 of the County's earlier Waste Management Strategy (repeated in The County's second draft Municipal Waste Strategy). The insularity apparent from the WPA's response to Swindon Borough Council's objection and other inquiry papers seems to me to be working against the greater good and national and regional policy (RPG10 policy RE5) by virtually precluding active cross border co-operation pending deliberation by the RTAB's. I accept that the WPA is right to avoid attracting waste from outside its borders if that is not the BPEO for the facility and location in question and so become a "regional dustbin". However, my concern is that a lack of active cross border co-operation may prejudice the cogency of the GWLP and cause inappropriate conflict that may be wasteful of resources.
- 3.10.8 **Recycling and composting** are clearly encouraged by the Plan through Key Objective 4 (waste hierarchy), policy 9 and the waste management options in the schedules of preferred

sites in chapter 4. I do not see the evidence that there is under-provision for these waste management methods in the Plan.

## RECOMMENDATIONS

- 3.10.9** Add at the end of paragraph RD 3.13; "Detailed waste data and projections are to be found at Appendix ?? to this Plan. The WPA will review and publish an update of these data annually."
- 3.10.10** Update the tables in RDGWLP on page 24 paragraph 3.15.
- 3.10.11** Delete the first 4 sentences of paragraph 3.15 and substitute; "In Gloucestershire there is currently a downward trend in the amount of total waste going to licensed landfill sites but certain waste streams going for disposal show a slight increase. Wastes originating from households destined for landfill have shown an increase of only 1% overall since 1996 whereas there has been a 10% increase in the recycling of municipal waste. This compares with a national average of 3% waste growth per year for household waste (National Waste Strategy for England and Wales – May 2000). A key objective of the Plan is that waste growth should be minimised and to achieve this national and local targets and restrictions have been set for household wastes in the Government's "Waste Strategy 2000". The Audit Commission, as part of the "Best Value" programme is setting recycling and composting targets for household waste at a local level. Each District waste collection authority (WCA) and County waste disposal authority (WDA) will have its own targets to meet. The targets relevant to the lifetime of the Plan are set out in the table below."
- 3.10.12** When reviewing the GWLP, include in the Plan a tabular or/and geographic reconciliation of significant waste sources and the locations of preferred management facilities.
- 3.10.13** Commence cross boundary discussion of waste management requirements with neighbouring waste planning authorities.
- 3.10.14** Input information from the Municipal Waste Strategy into the GWLP when appropriate.

## 3.11 Paragraph 3.16

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 62569/16     | DO/W             | Environment Agency                     |
| 88797/3      | RDO              | Federal Mogul Corporation              |
| 98640/3      | RDO              | Trustees of W. J Liddington (Deceased) |
| 61938/1      | RDS              | Tewkesbury Town Council                |
| 62569/1      | RDO/W            | Environment Agency                     |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) — The calculations behind the amount of waste to be diverted from landfill are not clear. This may cloud the issues surrounding site selection
- (ii) — Provision for landfill needs clarification
- (iii) — 'Reduction/minimisation' is a stronger statement than 'treat and manage.'

## Inspector's Reasoning and Conclusions

- 3.11.1 Landfill void space was subject to clarification during the inquiry particularly stemming from the Round Table Session on data mentioned in my report in sections 3.9 and 3.10. WPA1b (December 2001) updated landfill and other data previously submitted but was questioned on some aspects by Cory Environmental. WPA1b worked on 14,676,000m<sup>3</sup> of available void space which the WPA construes as equating to 17.3 years of landfilling or landraising at present inputs. The Environment Agency reviewed its latest data after the Round Table Session, and finally reported an even larger void space figure of 17,207,750m<sup>3</sup>.
- 3.11.2 Regulation of landfill sites is changing under the Landfill Directive and under the Pollution Prevention and Control Regulations 2000. Under the Landfill Directive sites now need to choose between treating hazardous and non-hazardous waste, as these wastes will no longer be able to be mixed and some wastes will be prohibited from landfill altogether. The Pollution Prevention and Control Regulations extend the scope of regulation to include more processes and impacts than hitherto.
- 3.11.3 In the light of the new legislation the Environment Agency estimates that, of the 17,207,750m<sup>3</sup> void space available, about 13,000,000m<sup>3</sup> could be declared for non-hazardous (municipal) waste giving a potential 20.8 years of landfill available. Given the plan's period for forward planning and the amount of void space available I agree with the WPA and Environment Agency that, on the balance of probabilities, no new void space is required at present.
- 3.11.4 WPA 31 suggests amendment of RDGWLP paragraph 3.16 to accord with data changes in paragraph 3.15. There must be correlation between figures in the Plan and this paragraph provides the WPA's best estimate of municipal and household waste for which management facilities will be required for the Plan's 10 year period. The appendix of data that I recommend at report 3.9.8 will include the forecast assumptions made, the veracity of which will become clear with experience. With the caveat that the projected figures are very uncertain and require regular updating (report recommendation 3.10.9), I accept that the WPA's figures, further updated by WPA1b, are the best estimate at the close of the inquiry even if they are indicative.

## RECOMMENDATION

- 3.11.5 Delete the first 2 sentences of paragraph 3.16 and substitute; "Given the targets that need to be met, there must be a significant reduction in the level of municipal solid waste going to landfilling and landraising over the plan period. It is currently predicted that, by 2012, waste management facilities in Gloucestershire will be required to recycle and compost 117,000 tonnes and recover 151,000 tonnes of municipal solid wastes annually with no more than 185,000 tonnes being allowed annually to landfill. This latter figure is less than the total of municipal solid wastes disposed of by landfilling and landraising in the County today."

## 3.12 Paragraph 3.17

### Comments

| Comments No. | Status (See Key) | Name                |
|--------------|------------------|---------------------|
| 60509/2      | DO               | Grundon (Waste) Ltd |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

- (i) The overall total for commercial and industrial waste needs to be clarified

### Inspector's Reasoning and Conclusions

- 3.12.1 As WPA1b clarifies, based upon a 1998/1999 survey, the Environment Agency reported in its Report for Gloucestershire County Council (June 2000) commercial and industrial waste arisings in the County to be 671,516 tonnes. Of this total 249,000 tonnes are diverted through re-use, recycling, composting and recovery. In 2005 the arisings are assumed to be unchanged but diversion is predicted to increase, particularly through increased recovery. The Plan will be clearer with this information in an appendix as recommended at paragraph 3.9.8 of my report. Grundon's objection now understates the scale of the arisings.
- 3.12.2 WPA 31 suggests updated figures as a result of new information that also clarifies the text but these figures require modification in the light of the latest predictions in the tables attached to WPA1b.

### RECOMMENDATION

- 3.12.3 Delete the last sentence of paragraph 3.17 and substitute; "It is estimated that, in Gloucestershire, this will mean that diversion will rise from the 249,000 tonnes of this waste that is currently diverted each year through re-use, recycling, composting and recovery, to increase by a further 50,700 tonnes in 2005 and by 63,377 tonnes in 2006 through to 2012."

### 3.13 Paragraph 3.18

#### Comments

| Comments No. | Status (See Key) | Name                           |
|--------------|------------------|--------------------------------|
| 65979/1      | DO               | Lafarge Redland Aggregates Ltd |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) The Plan should note that inert materials are required for active landfill site capping and engineering works and that quarry restoration is beneficial.

### Inspector's Reasoning and Conclusions

- 3.13.1 Cap and cover could well take up 10% of the void space, rather than 40%, according to the Environment Agency's final inquiry estimate (EAY/RTS/1.2) so inert waste required for other engineering purposes will expand this figure. This proportion seems worthy of brief mention for completeness even if landfill is no longer a favoured disposal option. WPA 31 also sets out clarifying amendments that will help understanding of the Plan, including projections consistent with WPA1b. This new data has overtaken the Deposit version of the Plan that formed the basis of the objection.
- 3.13.2 As I comment in paragraph 2.8.8 of my report, quarry voids are specifically identified in PPG10 as having potential for landfill. I agree with Lafarge Redland to the extent that landfilling of these voids could amount to a beneficial development, provided that BPEO is satisfied. It therefore seems to be an omission to exclude any mention of potentially beneficial uses here, even if policies for inert waste in general are found elsewhere in the Plan.

### RECOMMENDATIONS

- 3.13.3 Delete paragraph 3.18 and substitute; “Despite the reduction of this waste as a result of imposition of the Landfill Tax, over 160,000 tonnes of inert wastes were disposed of at landfill or landraise sites. This excludes wastes going to sites that are agricultural improvements. This waste stream is linked to construction and demolition schemes and so is open to fluctuations in quantity. However, provided that the Landfill Tax remains in place, there is good reason to suppose that the downward trend will continue. The Plan’s predictions assume no change to arisings over the plan period. This means that there is clearly a need for facilities that recover inert materials rather than to dispose of them by landfill or landraise. However, there may be a substantial element of benefit in some landfill projects and some inert waste will be required for capping, cover and site engineering.”
- 3.13.4 Add a new paragraph after 3.18; “The National Waste Strategy publishes an aspirational target for the increased use of inert waste as a secondary raw material. National targets are set to increase the amount of recovery of this material to 40 million tonnes per annum by 2001 and by 55 million tonnes per annum by 2006. These figures were based upon the generation of 70 million tonnes of this waste in 1998 in UK. Relating these targets to Gloucestershire results in the requirement to recover 57% of inert wastes per annum by 2001 (144,000 tonnes), and 79% by 2006 (198,000 tonnes).”

### 3.14 Paragraph 3.19

#### Comments

| Comments No. | Status (See Key) | Name                    |
|--------------|------------------|-------------------------|
| 62063/5      | DO               | Swindon Borough Council |

**Key:** O= Objection; C= Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

#### Summary of Objection

- (i) The requirement for landfill capacity needs to be clarified, including predicted growth of arisings and cross boundary movement of waste.

#### Inspector's Reasoning and Conclusions

- 3.14.1 The problems of establishing waste requirements are mentioned in section 3.9 of my report and cross boundary requirements and landfill void prediction at section 3.10. In summary, it seems clear from the Round Table Session on Data (CD 201 Rev), and from the Environment Agency's subsequent investigation and verification (EAY/RTS/1.2), that Gloucestershire has a relatively large void space capacity that is more than adequate for the plan period. What is not clear is the extent to which this void space distribution is BPEO for the reasons explained in section 3.10 of my report. I make recommendations on this at paragraphs 3.10.12 and 3.10.13 of my report and it is relevant to my appraisal of the selected and omission sites considered in Chapter 4.
- 3.14.2 WPA 31 suggests amended wording to RDGWLP paragraph 3.19 after a thorough year by year audit of MSW, C&I, C&D and Special Wastes data, but even this needs further amendment in the light of subsequent documents. Pending clarification during 2002 of the void space available for hazardous and non-hazardous wastes under the new licensing requirements, it seems to me that the best that the Plan can do at this stage is to publish the Environment Agency's latest data as presented in EAY/RTS/1.2. Reference could also usefully be made to detailed figures in an appendix to the Plan as suggested in recommendation 3.10.9 of my report.



## RECOMMENDATIONS

- 3.14.3 Add a new title of "LANDFILL POSITION" immediately before paragraph 3.19.
- 3.14.4 Delete the first 2 sentences of paragraph 3.19 and substitute; "Currently it is estimated that over 17 million cubic metres of permitted and licensed landfill and landraising void space exists in Gloucestershire. This year 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. At Appendix ?? of the Plan calculations are made on the basis of certain assumptions that result in there being more than sufficient void space in the County for the Plan period. These data will be kept under annual review, adjusted as necessary and published."

### 3.15 Paragraph 3.21

#### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 98640/4      | RDO              | Trustees of W. J Liddington (Deceased) |
| 62063/6      | DO               | Swindon Borough Council                |
| 62637/3      | RDO/C            | Cory Environmental (Glos) Ltd          |
| 62542/9      | DO               | Environmental Services Association     |
| 88797/4      | RDO              | Federal Mogul Corporation              |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

#### Summary of Objections

- (i) The increase in growth of arisings needs to be properly taken into account.
- (ii) The basis for the assessment made is unclear, including the requirement for new facilities.
- (iii) The annual figures for commercial, industrial and household waste need to be clarified.

#### Inspector's Reasoning and Conclusions

- 3.15.1 I wholeheartedly support the thrust of these objections. As I have commented previously in my report, particularly at section 3.9, the data and predictive assumptions made for the Plan need to be published and require energetic monitoring and review at this early stage in the implementation of new waste strategy. There are substantial differences between figures given in the Deposit and Revised Deposit versions of the Plan and in the final WPA inquiry update in WPA 1b as base data, assumptions and predictions are revised. WPA 1b section 2.4 sets out the latest prediction of minimum facilities needed to meet targets for different categories of waste taking all inquiry submissions into account except for CRY/RTS/1.1 and FEG/W/3. On this basis, these figures could well alter again by the time my report is published.
- 3.15.2 The Plan must set out the estimated requirement for waste facilities, whether present or new, and the basis for that requirement if it is to fulfil its public service function. WPA 1b represents the most up to date figures even if growth rates are challenged potentially affecting predictions later in the Plan period. The WPA's variable growth rate scenario is imaginative but based upon the success of its emerging Municipal Waste Strategy and is a case in point (WPA 1b section 2.1). However, because the number of preferred sites and facilities identified in the Plan may well exceed the capacity required, use of the WPA 1b figures does not prejudice the waste capacity of the Plan for the Plan period. Nevertheless, seriously erroneous figures could do so later in the Plan period or if objections to several sites in the RDGWLP are upheld. The real problem is that site operators would be unable to

establish need or BPEO for new facilities with adequate lead time. Also, as mentioned at section 3.10 of my report, one caveat to the efficacy of the RDGWLP is its failure to provide a spatial reconciliation of sources of arisings to existing and preferred facilities in order to achieve BPEO at a broad strategic level.

- 3.15.3 WPA 31 suggests changes to the text of this paragraph but is based upon outdated data. It seems appropriate to me to publish the best information on new capacity needed and, for me, that is at WPA 1b section 2.4.

## RECOMMENDATIONS

- 3.15.4 As for paragraphs 3.9.8, 3.9.13, 3.10.9, 3.10.12 and 3.10.13 of my report.
- 3.15.5 Delete paragraph 3.21 and substitute; “Based upon the best available data and to meet targets (see Appendix ??), there is a minimum requirement during the Plan period to provide capacity for about 1,350,000 tonnes of MSW, 3,870,000 tonnes of C&I waste, 2,250,000 tonnes of inert C&D waste and 624,000 tonnes of special wastes diverted from landfill to recovery, recycling or composting.”

## 3.16 Paragraph 3.22

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 60509/3      | DO               | Grundon (Waste) Ltd                    |
| 88797/5      | RDO              | Federal Mogul Corporation              |
| 60509/1      | RDO              | Grundon (Waste) Ltd                    |
| 98640/5      | RDO              | Trustees of W. J Liddington (Deceased) |

**Key:** O= Objection; C= Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) Clarify the waste figure.
- (ii) Requirement for a more explicit explanation of the waste requirements could be set out.

### Inspector's Reasoning and Conclusions

- 3.16.1 My comments on this paragraph of the RDGWLP echo those above on paragraph 3.21 of the Plan. Clarification should be achieved by the recommended technical appendix and the substance of recommendations on earlier paragraphs of this chapter of the Plan. I suggest that this summary paragraph needs to present an overview of the current position, the changes that the Plan seeks to make, and the scale of the new facilities required, as a springboard for chapter 4. Again I base my recommendation on the updated figures produced in WPA 1b and its tabled projections modelled upon the PPG10 Annex D Table 1 format, extrapolating where necessary.

### RECOMMENDATION

- 3.16.2 Delete paragraph 3.21 and substitute; “The 1.3 million tonnes of waste the County deals with each year needs to be reduced and the amount that cannot be reduced needs to be diverted as far as possible from landfill/ landraise to more sustainable options. By the end of the Plan period the 850,000 tonnes per year that now goes to landfill/ landraise must be reduced to 787,000 tonnes per year from all sources, and the 450,000 tonnes per year now treated or exported kept to about 554,000 tonnes per year. These figures incorporate growth estimates and reduction and diversion targets. These figures, and the assumptions at Appendix ??, form the basis for the number and type of waste management facilities in Chapter 4. These facilities will be required in

appropriate locations during the Plan period and each type of facility will need to be the best practicable environmental option at the time that planning permission is considered for it.”



## Chapter 4

### 4.1 General

#### Comments

*For a list of objectors and supporters see Appendix 1: Figure 3*

#### Summary of Objections

##### *General*

- (i) Waste should not be imported.

##### *Incineration*

- (i) Incineration produces serious toxic health risks and is unacceptable in principle.
- (ii) The use of waste as a fuel is likely to be unsafe and should be deleted from the Plan.
- (iii) Incinerators are a waste of energy and resources
- (iv) Recycling is more sustainable than incineration
- (v) People should be made more accountable for their own waste
- (vi) Europe demonstrates that waste incineration coupled with recycling can be successful.
- (vii) Incinerators should be located in industrial estates with large high rise factories. No such site exists in Gloucestershire.
- (viii) Users of heat from incinerators need to be identified in the Plan and in planning applications.
- (ix) It will be difficult to review incineration if it is in this Plan as an option.
- (x) Sewage sludge should not be incinerated.
- (xi) ~~No Emissions over Westbury~~

##### *Large Scale v. Small Scale Facilities*

- (i) A Regional Waste Management Facility would conflict with the Proximity Principle.
- (ii) Small scale rather than large scale plants comply with the Proximity Principle.
- (iii) Large scale facilities require long haul vehicle movements – pyrolysis is better.
- (iv) Sharpness is inappropriate as a regional facility.
- (v) Sharpness is appropriate as a regional facility and better than incineration at Gloucester
- (vi) Scale of expansions of existing facilities needs to be spelled out.
- (vii) A regional waste facility of several plants is the right solution.
- (viii) Contractual, financial and operating characteristics need to be discussed.
- (ix) Output demand for incinerators will diminish and economics unsound.

##### *Site Specific/Locational*

- (i) Gotherington would be under the plume of the Stoke Orchard incinerator site.
- (ii) Foss Cross site near Cirencester needs to be in the Plan and improved.
- (iii) Siting facilities close to Gloucester and Cheltenham commits them to hazard and nuisance
- (iv) The Hempsted site is inappropriate for expansion.
- (v) A regional multiple unit site should not be located in Gloucester or Cheltenham.
- (vi) No facility is provided in Cheltenham or Wotton
- (vii) The Horsley facility should be kept open.
- (viii) Stroud/Stonehouse and Cam/Dursley areas need to be better served.

##### *Waste Minimisation*

- (i) Waste management tax incentives should be introduced and local organisation improved.
- (ii) Measures to minimise waste and to maximise recovery need to be set out.
- (iii) Far more recycling plants should be allocated.
- (iv) Anaerobic digestion and methane collection facilities should be extended.

### *Planning Information*

- (i) Reassurance is needed in the Plan about consultation.
- (ii) Clarify how and when facilities in the Plan will be secured.
- (iii) The scale and nature of proposals on each preferred site are unclear.
- (iv) How is protection of the environment and enhancement of landscaping to be achieved?
- (v) Rights of way need to be shown in the Plan and mentioned in site profiles.
- (vi) Clarify who will conduct Environmental Impact Assessments.
- ~~(vii) Consultation regarding Sharpness~~

### *Editorial*

- ~~(i) Sharpness is Site 6 not 9 (Deposit Version)~~
- (ii) Should pages 38 – 40 follow page 25? (62604/7)
- (iii) The table on page 43 is a key to interpretation and needs to be referred to in the text (62604/8).

## **Inspector's Reasoning and Conclusions**

### *General*

- 4.1.1 Import (and export) of waste may be appropriate and necessary in certain circumstances if BPEO is to be achieved. Please see my report on this topic at sections 3.10, 4.10 and 5.3.

### *Incineration*

- 4.1.2 I address the topic of incineration in more detail at section 4.7 of my report. Incineration is only one of many options for waste management and for waste to energy recovery. No facility is proposed in the Plan with waste to energy as the only option. Where a waste to energy facility is designated as an option, a number of other options are included. This is to ensure that the best practicable environmental option is arrived at for that location.
- 4.1.3 The evidence does not demonstrate to me that incineration (or waste to energy employing a variety of technologies) should be excluded as an option in the Plan because it is incapable of being employed with an acceptable degree of safety and other environmental impact as a matter of principle. Modern plants appear to be employed without demonstrably harmful effects. Incineration will only be employed after recycling and composting have been explored as options and if recycling would not be prejudiced by virtue of application of the waste hierarchy (see section 2.17 of my report). The County Council is embarking on a drive to improve waste minimisation, re-use and recycling. An applicant for planning permission will also have to establish that the proposal is the BPEO for a particular location. The facility will be subject to stringent regulation when in operation. When technology is progressing and standards are improving I believe it would be wrong to exclude incineration, and other forms of waste to energy plant, from the Plan for the next decade. This would pre-empt an objective and balanced assessment when full details are known of the project proposed. It would deny the opportunity to achieve the best option because choice and comparison had been narrowed. Because waste to energy is an option at a facility in the Plan does not make it inevitable.
- 4.1.4 I deal with the merits of waste to energy facilities at particular locations in my report on objections to those facilities where such options are proposed.
- 4.1.5 The Plan rates incineration without energy recovery very poorly indeed and contemplates its use only in very specialised circumstances (see RDGWLP Figure 2.1 and section 2.17 of my report). Thus the means and feasibility of energy recovery would be a key point in any assessment of BPEO to raise it up the hierarchy (see again RDGWLP Figure 2.1). This assessment would be undertaken in the course of a planning application. Electricity could probably be recovered and used remote from an urban location whereas heating (if by steam) probably could not. The energy recovery system proposed would form a key part of

the project. It is premature and over-detailed to specify an energy client, or clients, in this Plan. However, it is worth citing the need for energy clients in the site profiles.

- 4.1.6 Whether sewage sludge should be incinerated is a matter for licensing of the incineration process rather than for regulation in this land-use Plan. Policy 21 regulates landspreading of sewage sludge.

*Large Scale v. Small Scale Facilities*

- 4.1.7 Please see section 4.10 of my report concerning a **regional facility, economies of scale and the proximity principle**. Section 2.10 of my report also addresses the achievement of BPEO of which proximity is only one part. I cover these topics further at sections 5.1 to 5.11 of my report.
- 4.1.8 Again, economies of scale need to be taken into account in the Plan and are a part of the BPEO exercise. Developers need to be prepared to meet the Plan's requirements if the County's waste commitments are to be met (paragraph 2.7.3 of my report refers). The Plan does not have the power to compel landowners to provide their land for the waste facilities sought by the Plan. It seeks to provide a practical framework and encourage voluntary compliance. Compliance with BPEO for a facility requires taking account of the environmental **effects of long haul transportation** and demonstrating that the proposal is the best option. This requires consideration and comparison of other options.
- 4.1.9 I consider the merits of **Sharpness** at sections 4.26 and 4.51 of my report.
- 4.1.10 **The "size" of sites** is set out in the Plan in 2 ways. There is the 50,000 tonnes per year capacity that divides Schedule 1 from Schedule 2 sites (please see section 4.10 of my report) and the site areas given in the site profiles. To go further in defining, and therefore restricting, the maximum potential for any site as Gloucestershire Health Authority suggests, would be, I believe, counter-productive. There are so many variables that affect the Plan, and the predictions are so difficult for the whole 10 year period, that the Plan needs to be flexible to remain relevant. It is also possible that the Plan does not provide all the best options in the list of preferred sites and potential facilities (please see section 3.10 of my report). One variable is precisely which sites and new facilities will come forward and when. This is impossible to judge with any reasonable degree of certainty at this stage although there are indications for some sites. Some sites and extra facilities depend on provision of major road improvements such as the Railway Triangle (site 10) and Sudmeadow, Hempstead (site 4). The technology, economics and regulations are changing. This Plan has much more certainty than would a non site-specific approach and, subject to the detailed comments in my report, I feel it goes as far as it can in defining the sites and facilities at this stage.
- 4.1.11 **Contractual considerations** are not matters for the GWLP. The Plan focuses on the County's waste commitments and how best to deal with them in the general public interest and not how to satisfy existing contracts. In doing so the Plan obviously should not be so onerous that operators and landowners will not be prepared to co-operate. BPEO considers the economic and operating characteristics as well as the environmental aspects of a proposed facility at the application stage. This seems appropriate and emphasises the need for flexibility in the Plan with extra sites and a range of potential facilities so that the best solution can be achieved at any given time. I would expect all new contracts to conform to the guidance of the GWLP once adopted and for existing contracts to be adapted to conform as far as reasonably practicable under the terms of the contract.
- 4.1.12 The concern at the **Plan being capacity and input led** resulting in incinerators being justified is overstated in my view. While it is clear that waste to energy plants have a place in the options available for waste management, there is equally clear guidance to the effect that such plants should be considered after recycling and composting and they must be assessed as the BPEO at the time of decision on an application for planning permission. BPEO includes an assessment of the plant's value in producing energy. Thus a waste to energy plant will only be approved if it is demonstrated to be the best option in terms of

sustainability. It would be wrong to exclude consideration of the potential for the best option as I say in 4.1.3 above.

*Site Specific/Locational*

- 4.1.13 For concern about the Stoke Orchard sites 1, 2 and RD18 and the Foss Cross site RD19 please my report on the objections to them at sections 4.20, 4.21, 4.46 and 4.47.
- 4.1.14 Gloucester, and Cheltenham nearby, are both substantial urban areas that generate large quantities of waste. To minimise transportation and its harmful effects the waste facilities to service these settlements should be located as near as possible to them as a matter of principle. Hence the proximity principle explained in the Plan at paragraphs 2.21 to 2.23. An exception to this is if a more sustainable means of waste management can be found that is further away (please see section 2.11 of my report). In that context I address the objections to sites 4, RD3, 9, 10, 11, 13, 14 and RD21 in and around Gloucester later in my report; to the omission of a site in Cheltenham below at paragraph 4.1.18; and at the omission of site 6 Sharpness to serve Gloucester at sections 4.26 and 4.51 of my report. However, as I comment in sections 2.18 and 3.10 of my report, I am not at all clear that Structure Plan policy WM2 has been effectively implemented in the Plan by creating a network of facilities geared to waste arisings. The distribution of sites could have been distorted by a preponderance of derelict or otherwise suitable sites in Gloucester and a lack of them in and around Cheltenham and other parts of the County. The site selection process does not make this clear. I recommend review and improvement of site selection at sections 2.18 and 3.10 of my report. Any proposals for facilities at the preferred sites in the Plan need to satisfy BPEO, including traffic effects, through policy 1. This policy is designed to rule out inappropriate development.
- 4.1.15 As to the vulnerability of people in Gloucester, it is self-evident that, if waste management facilities give off harmful fumes, ash or dust, or have other adverse impacts, they will affect people living or working nearby. However, the degree of any effects will depend on a number of factors and such factors need to be identified in any application for planning permission or for a waste management licence or permit. If planning permission is granted, it is the task of the pollution control authorities, either the Environment Agency or local authority, to ensure that waste management processes are not harmful to human health, do not pollute the environment and do not cause serious detriment to the amenities of the locality. This regulation applies as much to a small settlement like Sharpness as it does to the larger population of Gloucester. The planning and pollution regulation procedures are designed to ensure that inappropriate development does not take place. The RDGWLP and its inquiry process applies broad scrutiny of potentially harmful development. The Plan is based upon the processes evaluated and described in the Government's Waste Strategy 2000. These factors seem to me to give as much assurance as can reasonably be expected that no population will be made vulnerable to demonstrable harm from waste development.
- 4.1.16 A regional facility, proposed at Sharpness in the Deposit version of the Plan was deleted by the Revised Deposit version of the Plan. I comment on a regional facility and on Sharpness at sections 2.11, 3.10, 4.26 and 4.51 of my report. A waste to energy plant project in Gloucester would be subject to the scrutiny and controls mentioned in the previous paragraph of my report.
- 4.1.17 The Plan shows the locations of existing licensed facilities and of preferred sites on separate plans and lists. There is no plan of the County showing population densities to give an indication of arisings, neither is there any auditable reconciliation of arisings in relation to facilities in terms of sustainability. Looking at the plans and lists gives a very rough impression of the present and proposed spread of waste transfer stations. It is not clear to me that the Nailsworth/Dursley/Wotton-under-Edge area, the north east boundary section of the County, the north west area of the County, and Coleford and Chepstow are adequately served because facilities are not shown convenient to them. There may be other areas where waste transfer stations are shown but which are less than the required capacity. I therefore support the principle of the objection to the extent that an adequate network of



waste transfer stations needs to be in place in accordance with Structure Plan policy WM2. But, without clearer evidence of any specific shortcoming, I can do no more than recommend a review of the adequacy of these facilities and that the Plan makes the position clear. I also cover this topic at sections 2.18 and 3.10 of my report. All Schedule 1 sites are designated for potential waste transfer and most, but not all, Schedule 2 sites. Of those preferred sites not designated for waste transfer, Moreton in Marsh (site 7) seems a potential candidate (please see my report at section 4.31).

- 4.1.18 I comment on the apparent distortion in the location of sites as between Cheltenham and Gloucester in paragraph 4.1.14 of my report. The Civic Amenity Site at Swindon Road, Cheltenham that Mr Ridlington seeks to have retained, and is otherwise known I believe as the Cheltenham Borough Council Depot, does not seem to be shown in the RDGWLP. I saw that it was a very good and useful facility and is well placed to serve the town. I therefore support the objection to that extent, although I am not aware of any intention that it will cease operating during the Plan period. As currently laid out, the site in use by the public seems too small, and its access unsuitable for the traffic that would be generated by a Schedule 2 facility. But, this opinion is based only on a brief visit and without a detailed proposal before me.
- 4.1.19 I have commented above on the apparent lack of facilities in the southern area of the County around and south of Stroud amongst other areas. I believe this needs review and may need corrective action. I have no evidence that the Horsley facility (Pyke Quarry, Nailsworth RDGWLP Appendix 5 no.27) will not continue to operate during the Plan period. It is shown as a licensed facility in the Plan. I mention this further at section 5.13 of my report.

#### *Waste Minimisation*

- 4.1.20 Waste recycling and composting are encouraged by the Plan through the waste hierarchy and discipline of BPEO (policy 1). Policy 9 supports composting schemes. Minimisation is an aim of the Plan but it needs to be implemented through other measures besides land-use (policy 35). Please see paragraphs P1.1.5 to P1.1.7 and section 5.66 of my report. It is common ground that organisational measures to improve reduction, re-use and recycling of waste are very necessary and they are being put into effect. Taxation is beyond the scope and powers of the Plan. I have commented on improving the disposition of facilities elsewhere in this section of my report.
- 4.1.21 The Revised Deposit version of the Plan has increased the potential anaerobic digestion facilities from 11 to 13. I shall consider the support for further such facilities when assessing the objections to individual sites. The waste hierarchy at RDGWLP Figure 2.1 reflects the policy that methane from landfill should be recovered. As methane is a powerful greenhouse gas, Waste Strategy 2000 and the Landfill Directive require its escape to be minimised. I see no need to change the Plan beyond the recommendations I have made elsewhere.

#### *Planning Information*

- 4.1.22 Waste development is inherently controversial and so I support the need for public reassurance. Although there is a well established framework for public consultation at the planning application stage it would be helpful to those less familiar with the planning process, to add a comment about consultation in paragraph 4.13 of RDGWLP.
- 4.1.23 The timescale for the Plan is to 2012. However, there are, by design, more sites and facility options than are required to meet predicted arisings. As I have commented in my report, and particularly at sections 3.9 and 3.10 and at paragraphs 4.1.8 and 4.1.10, there are many variables and uncertainties which affect the Plan and development is voluntary not compulsory. If waste development is to be sustainable it would be ill advised to specify too much detail on today's understanding of technology, needs and environmental criteria. The Plan would quickly become outdated and irrelevant. The Plan thus sets out a framework and principles to guide and encourage development rather than prescribe the requirements

in great detail and discourage construction of waste facilities. I agree with the WPA that this approach is likely to achieve the best solution for the people of Gloucestershire. Subject to my other detailed comments in this report, the scale and nature of development described in Schedules 1 and 2 and in the site profiles seems very adequate for the reasons I have explained.

- 4.1.24 The need for landscaping and amelioration of any material environmental impact of waste management development will be assessed in the course of a planning application, which is when full details will be known. The WPA has a duty to consider landscaping in accordance with section 197 of the Town and Country Planning Act 1990. Particular features of landscape and other concern are highlighted in the site profiles for the preferred sites. For those facilities that require an Environmental Impact Assessment, the "General Development Criteria" on page 46 of RDGWLP sets out matters to be addressed. Key Objective 3 seeks preservation or enhancement of environmental quality (RDGWLP paragraph 2.13). Policies 26, 27, 36 and 44 all seek landscaping if, and where, appropriate. I feel that this is as far as the Plan needs to go.
- 4.1.25 I believe the GWLP would be improved if rights of way could be superimposed on the site plans or mentioned in the site profiles. They are a public land-use resource the use of which could be affected by waste development. Policy 40 concerns them. They are therefore relevant when the merits of proposals are assessed together with the environmental designations already drafted.
- 4.1.26 I believe the requirements for securing an Environmental Impact Assessment and the explanation of the procedure in the Plan is satisfactorily covered in section 4.10, and particularly in recommendations 4.10.10 and 4.10.11, of my report.

#### *Editorial*

- 4.1.27 I agree with the suggestion that the waste technology information sheets should follow the text on waste management methods and before "Site Selection". In RDGWLP I see nothing in paragraphs 4.4 to 4.7 that needs to come after the information sheets. The interruption in the flow of text does not seem justified now that the division of facilities in paragraph 4.5 of the Deposit version has been deleted.
- 4.1.28 I agree that the Plan would be more user-friendly if a note was to be printed on the bottom of the pages for Schedules 1 and 2 drawing attention to the Key to the Inset Maps.

#### **RECOMMENDATIONS**

- 4.1.29 Specify the need for energy clients in the site profiles of those preferred sites that have a waste to energy option.
- 4.1.30 Review the adequacy of primary and secondary facilities in the County beyond Gloucester and Cheltenham to meet Structure Plan policy WM2 and clarify the distribution of these facilities in the Plan at its 5 year review point, including by showing a reconciliation of facilities with arisings.
- 4.1.31 Insert the Cheltenham Borough Council Depot, Swindon Road, Cheltenham into the list of Civic Amenity Sites and on the sites plan at Appendix 5.
- 4.1.32 After the first sentence of paragraph 4.13 insert; "The normal consultation will take place at which members of the public, any interested bodies or organisations and statutory consultees may submit views for consideration."
- 4.1.33 Insert public rights of way into the plans or site profiles of preferred sites.
- 4.1.34 Place the technology information sheets after the section on "Waste Management Facilities" and before "Site Selection".

- 4.1.35 At the bottom of RDGWLP Schedule 1 (page 45) and Schedule 2 (page 65) add a note that; "The Key to Environmental and Other Constraints and Features on the Inset Maps is at page ....."

## 4.2 Paragraph 4.1

### Comments

| Comments No. | Status (See Key) | Name                          |
|--------------|------------------|-------------------------------|
| 62005/6      | RDO              | Countryside Agency            |
| 62637/4      | RDS              | Cory Environmental (Glos) Ltd |
| 61998/2      | RDS              | British Waterways             |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) Clarify 'the plan is site specific not process specific...'

### Inspector's Reasoning and Conclusions

- 4.2.1 The terms used may not be entirely clear, particularly to the general public. I therefore suggest an alternative form of words that may be better.

### RECOMMENDATION

- 4.2.2 Delete the second sentence of paragraph 4.1 and substitute; "The Plan allocates specific sites, or small areas of search, together with a range of potentially acceptable waste management options. The objective is to achieve a range of waste management facilities that are the best practicable environmental options in Gloucestershire by encouraging, and allowing for, future improvements in technology."

## 4.3 Paragraph 4.2

### Comments

| Comments No. | Status (See Key) | Name               |
|--------------|------------------|--------------------|
| 62569/17     | DO/W             | Environment Agency |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) ~~Description of landfill/landraise.~~

## 4.4 Information Sheet: Household Waste Recycling Centres

### Comments

| Comments No. | Status (See Key) | Name               |
|--------------|------------------|--------------------|
| 62569/18     | DO               | Environment Agency |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

- (i) Requirements for impermeable surfaces and the routing of surface water via an interceptor should be included for scrap yards, waste transfer stations and composting sites.

## Inspector's Reasoning and Conclusions

- 4.4.1 The WPA accepts this objection and proposes an amendment to RDGWLP at WPA31a with which I agree.

## RECOMMENDATIONS

- 4.4.2 Add the following text to the "Site Requirements" section of RDGWLP page 31 (Household Waste Recycling Centres), page 32 (Waste Transfer Stations) and page 34 (Composting); "Facilities will need a suitable impermeable hard standing and to route surface water drainage via an interceptor to meet Environment Agency requirements."

## 4.5 Information Sheet: Materials Recovery Facilities

### Comments

| Comments No. | Status (See Key) | Name                |
|--------------|------------------|---------------------|
| 60509/6      | DS               | Grundon (Waste) Ltd |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## 4.6 Information Sheet: Scrapyards

### Comments

| Comments No. | Status (See Key) | Name                              |
|--------------|------------------|-----------------------------------|
| 61897/4      | DO/W             | Westbury On Severn Parish Council |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

- (i) ~~Elton site requirements – comment on previous planning decision.~~

## Inspector's Reasoning and Conclusions

- 4.6.1 See amendment at Recommendation 4.4.2 to Environment Agency objection.
- 4.6.2 I agree with the WPA proposal that the description "scrapyard" be replaced by "metals recycling facility" (WPA 31a). Although it is 3 words instead of one, it more accurately described the waste function and may help to dispel the historic dirty and noisy image of scrapyards as improved facilities are developed.

## RECOMMENDATIONS

- 4.6.3 As per paragraph 4.4.2 of my report.

#### 4.6.4 Amend “Scrapyard” to read “Metals Recycling Facility” throughout the Plan.

### 4.7 Information Sheet: Incineration with Energy Recovery

#### Comments

*For list of objectors and supporters see Appendix 1: Figure 4*

#### Summary of Objections

- (i) Incineration is unacceptable as a waste management option.
- (ii) Composite facilities will be inappropriate and a flexible approach needed to uses of sites.
- (iii) Mixed uses on sites have the potential to complement each other and be BPEO.
- (iv) Environmental impact depends on other land uses on or near a site.
- (v) The meaning of ‘suitable’ industrial and residential developments should be made clear.
- (vi) Waste to energy incineration is not renewable energy
- (vii) The list of disadvantages is incomplete.
- (viii) It is not a disadvantage that the ‘pros and cons’ are widely debated. (90096/14)
- (ix) The client for heat needs to be identified.
- (x) Remove reference to site 6 as a regional facility.

#### Inspector's Reasoning and Conclusions

- 4.7.1 While the Government's Waste Strategy 2000 sees a place for waste to energy technology, potentially including **incineration**, as part of an integrated waste strategy, the Minister, Mr Meacher has said that there is no legal requirement to include incineration in a waste plan leaving it to Waste Planning Authorities to decide. PPG10 advises however that development of particular types of waste facility should not be prohibited unless the WPA is confident that alternative facilities will be available in the area. The WPA does not have this confidence, and neither do I, given my reservations on future projections and of some sites (please see my report at sections 3.9, 4.20, 4.21 and 4.24).
- 4.7.2 Waste to energy is plainly regarded by Government as less preferable to recovery and recycling and should not pre-empt them now or for the future. RDGWLP reflects this priority in its implementation of the waste hierarchy (Figure 2.1 as proposed to be amended). Besides municipal solid waste that forms the bulk of incinerator fuel, there are also wastes, such as human organs and tissue from operating theatres and certain industrial wastes from the heavy chemical industry, that need to be incinerated because of a lack of an alternative appropriate method of disposal. Incineration provides the safest option for these special wastes at present.
- 4.7.3 There is no doubt that burning many materials can produce very harmful pollutants. Dioxins, furans, heavy metals and fine particulates are examples of special concern. Some pollutants have a bio-accumulative effect, are persistent, and can be harmful even in small doses as noted by the House of Lords Select Committee on the European Communities 11<sup>th</sup> Report. The World Health Organisation conclusions of a low threshold for no-effect on plants of NO<sub>x</sub>, and the synergistic effects between SO<sub>2</sub> and NO<sub>2</sub>, demand a cautious approach to nature conservation, especially as these thresholds are lower than for human health (FEG/P/1). Similar caution is advocated if human life expectancy is likely to be shortened (FEG/P/1.3 and CRY/BWW/DOC/18). However, more is now understood about the conditions that produce these substances and it is my understanding of the evidence that the likelihood of such harmful emissions and their extent is greatly reduced by new techniques and procedures employed.
- 4.7.4 One such example is through the control of temperature and combustion time to prevent dioxin production. Others are the design of the stack (or chimney) to optimise the dispersion characteristics of emissions, and the introduction of filtration systems to remove particulates. As a result we seem to have a situation today where the health impact of incinerator emissions are exceedingly low and are much less polluting, for example, than

power stations and common bonfires. This is borne out by the independent Report to the National Society for Clean Air and Environmental Protection May 2001 on municipal solid waste incineration: health effects, regulation and public communication (CD132).

- 4.7.5 FEG takes a very sceptical view of this work (Greenpeace: Incineration & Human Health CD135) but the Environment Agency's assessment in November 2001, after Greenpeace's highly critical response to the Clean Air Society report (CD 139), and after the issue of the US National Research Council Committee Report 2000 (cited in CD139), is that incinerators will continue to have a part to play in an integrated strategy for waste management (FEG/W/3).
- 4.7.6 Many ordinary day to day activities, such as travel, have risk, as do recycling, composting and landfill (CD132 page 26). Potentially harmful substances, such as dioxins, are often present in air and can be present in food creating a background level. Accepting that procedures are subject to human error, and that incinerator equipment is subject to malfunction, it is clearly vital that a precautionary approach is applied and that standards are set to ensure that risk does not exceed a normally acceptable level. Such standards would seem to accept the shortening of life to a marginal degree as a matter of risk (CRY/BWW/Doc//18). FEG takes a contrary view. However, these standards have been researched and are set down. Today's standards are much more stringent than in the past, especially those in the European Waste Incineration Directive 2000 (EC 7/2000). It has not been suggested that the authors of national and European standards do not have access to the current research and experience that is cited as evidence by objecting parties.
- 4.7.7 The Government is responsible for safeguarding public health and the Environment Agency is its agent for regulating potentially polluting processes such as incineration. It carefully assesses waste management processes, determines whether a process can meet required emission standards and what conditions need to be imposed upon a licence to ensure compliance. Periodic checks are made and the licence conditions can be amended if necessary to maintain standards. If warranted, a plant can be ordered to shut down to prevent harm occurring or other sanctions can be applied.
- 4.7.8 It is not clear to me from the evidence, despite uncertainties that still exist, that incinerator or other waste to energy technologies will probably cause material harm through pollution, as defined in the public interest, and are unlikely to be licensed. I also cannot preclude the possibility that waste to energy plants will be found to be the BPEO for waste in some locations when all factors are considered, despite the unfavourable costs and benefits analysis at Table C4 of Waste Strategy 2000 cited by FEG, and of the visual and traffic impact of such plants. Visual impact can be ameliorated and traffic impact may be acceptable if the infrastructure and location are appropriate. I am not sure that waste minimisation, recycling and recovery initiatives will be sufficient to cope with such a high proportion of Gloucestershire's waste in the Plan period so that waste to energy management methods can be precluded. Waste to energy facilities are preferable to landfill, and the part that mechanical biological treatment could play is not yet clear. ESA observes that waste to energy plants co-exist with high rates of recycling in Switzerland and Denmark. For all these reasons I firmly believe that waste to energy, including incineration, should be included as a waste management option in the Plan for the period to 2012.
- 4.7.9 In coming to the above conclusion I am very conscious of the strongly held views of some objectors and particularly those advanced by Mr David Drew MP, Friends of the Earth Gloucestershire, Friends of the Earth Forest of Dean, the Hempstead Residents Association and the bulk of individual objectors, many using standardised comments. I respect these views but I have the impression from the objections that, for many (but not all), they are a targeted campaign of principle to achieve zero risk based upon fear of a worst case scenario without regard for the balance of advantages and disadvantages and up to date evidence of safety and risk. People's perception of fear is a legitimate planning concern but the weight to be given to it should be balanced by the controls that exist and the evidential basis of the fear. On the other hand Mr Drew and FEG (Greenpeace CD138) constructively seek to ensure that recycling is promoted to a degree that makes incineration unnecessary and this is

consistent with government policy. The difficulty is that it will probably take more than the Plan period to achieve.

- 4.7.10 Achieving zero risk is also a laudible aim but I do not feel that it is feasible within this Plan period, if at all. I am reinforced in this view by the absence of evidence of likely harmful effects attributable to modern incinerator plants, which I sought during the inquiry. The statistics of breaches of incinerator authorisations produced in FEG/RTS/2 pages 16 and 17 show a clear general improvement in standards in recent years but do not indicate the seriousness of the breaches and the likely impact. This is despite FEG's request for this information of the Environment Agency on 6 February 2001 (FEG/RTS/2). I see no reason why this information should not be in the public domain. The Clean Air Society Report concludes that there have been almost no failures to comply with emission limits for the most toxic substances (CD132 page 24) although FEG casts doubt on the reliability of this conclusion (CD 139). No breach should be taken lightly but, bearing in mind the factor of safety in the standards as a precautionary measure, recorded breaches can fall short of causing material harm.
- 4.7.11 Firm regulation is clearly necessary if the regime is to work and to attract public confidence. The record of breaches could be construed as the regulatory system working. As paragraph 1.34 of PPG23 states, "*Planning authorities should work on the assumption that the pollution control regimes will be properly applied and enforced. They should not seek to substitute their own judgement on pollution control issues for that of bodies with the relevant expertise and the statutory responsibility for that control.*" This applies to landfill of residues as well as the burning of waste. For the purposes of the GWLP I therefore feel that the Environment Agency view that incineration, and other waste to energy technologies, are not fatally flawed should prevail and does not breach the Human Rights Act.
- 4.7.12 **Composite facilities** are most likely to be found on a large site. Materials recovery facilities are particularly suitable to be co-located with waste to energy plants and the text implies this. Depending on the process used, the size of the site and the character of the land, there may be other appropriate complementary facilities and the desirability of integrated facilities is right in principle and clear from the brief. If the **co-location of facilities** reduces travel it will materially support a BPEO argument. However, there are many factors to be considered and any proposal would need to be assessed holistically and carefully. The Plan, with its range of sites, potential waste management options and policies in Chapter 5, seems to me to be flexible, while providing guidance. I do not find this flexibility compromised by the text of this Information Sheet or that any change is necessary to give emphasis.
- 4.7.13 I accept that the **environmental impact** of any waste management facility will depend on its surroundings as well as on its own characteristics. Much can be done to minimise visual impact and of fumes, noise, dust and litter with careful design and by siting. PPG10 (Annex A paragraphs A50 to A57) suggests locations for waste management facilities, including those that are degraded by virtue of earlier development and those approved for uses of a similar character to waste management facilities. RDGWLP Key Objective 9 is apposite (RDGWLP paragraph 2.13). Incineration plants seem capable of being categorised as Class B2 industrial uses in certain circumstances. Policy 36 specifically concerns sympathetic integration of facilities. I therefore see no need to alter the Plan.
- 4.7.14 The **suitability of industrial and residential land** relates principally to proximity and need if heating systems, as currently envisaged, are to be used for energy recovery. The heating infrastructure could be prohibitively expensive if distances are great. If houses or industrial plants are already heated efficiently, and sustainably, by other means then heat from waste may not be economic. I see no need to alter the comments on site requirements.
- 4.7.15 Incineration is only one form of waste to energy technology but this technology is still regarded by Government as a source of **renewable energy** (Waste Strategy 2000 Part 2 paragraphs 5.55 to 5.56 refer). Removal of the DTI subsidy and the Environment Agency's recent support for exclusion of mixed waste incineration from the Renewables Obligation

seems driven by the need to promote recycling and composting. The Agency still regards incineration as having potential in an integrated system (FEG/W/3 paragraph 1.17) and it would seem reasonable to regard the energy as being renewable until it begins to prejudice recycling, composting or other measures higher up the waste hierarchy.

- 4.7.16 Waste to energy would seem to remain an **advantage** for the time being (as above) but this status should be made clear. Based upon my explanation above, the first and second bullet points of **the disadvantages** seem to duplicate each other. All potentially polluting waste management methods generate concerns, which is why their licences will contain conditions. FEG is right that some residues need to be landfilled and are toxic. So it seems a fair point to add to the disadvantages list. FEG's criticism of a lack of detail regarding transportation is very relevant to a planning application but seems inappropriate in this synopsis beyond the mention, already made, of the "potentially substantial environmental impact of a major site".
- 4.7.17 I comment on the **debating of the pros and cons of incineration** in section 4.9 of my report where it features in the text of RDGWLP page 39 (Waste to Energy Synopsis).
- 4.7.18 I have commented on the **client for heat** at paragraph 4.1.5 of my report.
- 4.7.19 I deal with **site 6 (Sharpness) and its regional potential** at section 4.26 of my report.

## RECOMMENDATIONS

- 4.7.20 Incineration and other waste to energy technologies should be retained in the Plan as a waste management option.
- 4.7.21 "Advantages" second bullet point add; "while measures higher in the waste hierarchy are not adversely affected".
- 4.7.22 "Disadvantages"; delete the first bullet point. Amend the second bullet point to read; "It is perceived as a more polluting technology than other methods". Add a new bullet point; "Some ash requires landfilling especially that which is toxic."

## 4.8 Information Sheet: Pyrolysis

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/22     | DO               | Friends of the Earth (Gloucestershire) |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) The description of pyrolysis needs improvement.

### Inspector's Reasoning and Conclusions

- 4.8.1 I agree with the objection. The GWLP needs to be understood by ordinary members of the public as well as by developers and experts. Waste technology has many important, and complex aspects. The Plan places great emphasis on evolving technologies and achievement of BPEO. The public needs to be able to grasp the implications of this to understand the Plan. I therefore feel that a reasonable description of the processes is important in the Plan, preserving a balance between the great detail contained in the technology summary sheet in WPA 5, and the very basic and summary principle of pyrolysis in RDGWLP page 38. This section of the Plan would read more easily if the helpful "Waste to Energy Synopsis" were to precede the more detailed descriptions of this



family of processes. The process descriptions should then follow the helpful pattern of the processes set out on pages 28 to 34 and on page 37.

## RECOMMENDATIONS

- 4.8.2 Bring the “Waste to Energy Synopsis” forward to precede “Feedstock Recycling”.
- 4.8.3 Use the Technology Summary Sheets of WPA 5 to amplify the description of pyrolysis (and of other processes with very brief descriptions), including by listing advantages, disadvantages and site requirements.

## 4.9 Information Sheet: Waste to Energy Recovery Technologies

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/23     | DO               | Friends of the Earth (Gloucestershire) |
| 89977/3      | DLO              | Kirby Jeff Dr                          |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) Application of BPEO, proximity and precautionary principles and waste hierarchy eliminates incineration as an option.
- (ii) Pollution from incinerators of heavy metals, dioxins dust and acid gases seriously affects health.
- (iii) Bottom and top ash produced by incineration are toxic and are likely to leach from landfill.
- (iv) Incineration will cause greenhouse gas emissions
- (v) Identification of a heat client is a pre-requisite for construction of an incinerator.
- (vi) An incinerator needs to be built close to homes or workplaces to heat them but pollution will prevent this.
- (vii) Waste to energy incineration is not renewable energy and has many disadvantages.
- (viii) Debate of the ‘pros and cons’ is not a disadvantage.
- (ix) The public is not behind the times and ill informed.
- (x) Ash forms 40% to 50% by volume of unburned compacted waste.
- (xi) Incineration contracts will undermine recovery and recycling initiatives.
- (xii) Energy savings are greater from recycling than from waste to energy.
- (xiii) Research documentation should be quoted for the synopsis statement.
- (xiv) Waste management and destination options are confused.
- (xv) Presentation of costs and benefits is required for incineration to be accepted.

### Inspector's Reasoning and Conclusions

- 4.9.1 As I conclude at sections 4.1 and 4.7 of my report, it would be premature, and contrary to the general public interest, to **exclude incineration** from the Plan so that it is precluded from consideration alongside other methods.
- 4.9.2 It is right that the **emissions from incinerators** are potentially capable of harming human health. There is also the factor of cumulation of contamination that needs to be considered in assessing the safety of incinerators applying the precautionary principle as appropriate. These are matters to be carefully considered when any plant seeks planning permission or a licence to operate and may cause permission to be refused or conditions to be imposed on any permission or licence. Please see section 4.7 of my report. However, I agree with FEG that it is perhaps misleading to define any of the waste to energy technologies as “fully” developed. This contrast with the earlier statement, and evidence, of development being “fast moving” and merits an amendment.

- 4.9.3 Please see paragraph 4.1.5 of my report regarding a heat client. I accept that a practicable scheme for energy recovery that is intended to be implemented needs to form part of an application for planning permission if it is to attract full credit in a BPEO assessment.
- 4.9.4 There are incinerators built close to homes now, for example the very large combined heat and power plant serving the London Boroughs of Lewisham, Southwark and Greenwich (425,000 tonnes/year capacity and cited as an example by FOE Gloucestershire), that does not appear to be causing harmful effects (CD 203). Any new plant employing incineration will be subject to careful assessment and continuing regulation to ensure that it does not cause harm. Please see section 4.1 of my report.
- 4.9.5 Please see my report at section 4.7 with regard to the point about renewable energy.
- 4.9.6 I agree that the mention of the 'pros and cons' of incinerators having been widely debated is open to misunderstanding, especially if mentioned as a disadvantage. The comment does not seem to add anything of help to the information sheet. In any event, I believe a wide debate is healthy, provided it is open-minded and the outcome is objective and balanced. I feel that the first bullet point of "Disadvantages" should be amended to delete the phrase about a debate. I regret to say that I have the impression that many members of the public are ill-informed about incineration but, more importantly, many also have a mistrust of experts and those responsible for regulating safety. There is clearly a need to restore confidence but this does not to my mind equate to agreeing with views that are not fully informed or balanced and objective.
- 4.9.7 The volume of incinerator ash seems significantly less than the volume of compacted or uncompacted waste before burning and any inefficiency in this is greatly mitigated by the recovery of the bottom ash. Bottom ash is about 30% of the refuse mass. The top ash proportions requiring disposal are small at about 5% of the refuse mass but are toxic (FEG/RTS/2 paragraphs 1.52 to 1.54). What is important is the efficiency of a plant, particularly if it can utilise its heating potential. The residues and toxicity are matters to be considered in establishing BPEO for any application that comes forward. The requirement for landfilling of residues is a clear and obvious disadvantage of incineration that is reflected in the waste hierarchy. Waste management and destination options will arise for consideration in a planning application under policy 1 (BPEO). I find no need to alter the Plan except to include the burning of gas within the definition of "energy from waste" in the glossary.
- 4.9.8 Please see my report paragraph 4.1.11 on contractual considerations. I accept that there is a need to be wary that a waste contract does not lead to recycling or composting initiatives being prejudiced. This will fall to be considered at the planning application stage when economic considerations form part of the BPEO analysis. I feel sure that the County Council would, as a contracting party for waste disposal, make a declaration of any commitment material to the application at the appropriate stage.
- 4.9.9 Presentation of costs and benefits will form part of the BPEO exercise during a planning application when details are known.

## RECOMMENDATIONS

- 4.9.10 In line 3 of the text amend "fully" to read "well".
- 4.9.11 Amend the first bullet point of "Disadvantages" to read; "Waste to energy technology suffers from the less stringent controls and pollution that occurred up to the early 1990's. Public perception seems often prejudiced by this historic technology and a fear of harmful emissions of dioxins, furans and heavy metals."
- 4.9.12 Amend the Glossary – Energy from Waste by inserting in the definition after "waste", "or gas".

#### 4.10 Paragraph 4.5

##### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/24     | DO               | Friends of the Earth (Gloucestershire) |
| 98640/6      | RDO              | Trustees of W. J Liddington (Deceased) |
| 88797/6      | RDO              | Federal Mogul Corporation              |
| 99020/4      | RDO              | Chaplin S M Mrs                        |
| 62043/2      | RDO              | Gloucester City Council                |
| 62637/1      | DO/W             | Cory Environmental (Glos) Ltd          |
| 88662/3      | DO               | Phelps Bros                            |
| 62005/7      | RDO              | Countryside Agency                     |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

##### Summary of Objections

###### Initial Deposit

- (i) Description of sites 1-6 as 'strategic' could be taken to mean 'regional' and contrary to the proximity principle.
- (ii) 'Large and small' scale provision needs definition.
- (iii) Confirm that waste-to-energy includes Gasification/pyrolysis technology

###### Revised Deposit

- (iv) More details of processes and types of waste are required.
- (v) The need for an Environmental Impact Assessment should be clarified.
- (vi) All matters considered in an Environmental Impact Assessment should not be left to the planning application stage.
- (vii) 50,000 tonnes will be an unwelcome ceiling on some sites.

##### Inspector's Reasoning and Conclusions

- 4.10.1 The **proximity principle** is only one of a number of principles that apply to achieve the best practicable environmental option for a sustainable waste management system. As explained at sections 2.11, 5.3 and 5.9 of my report, use of rail and water transport to a location could be better environmentally than to another facility less distant from waste arisings. Proximity is therefore not an overriding factor in all cases.
- 4.10.2 The **self-sufficiency** principle is focused on the region but aims to require all communities to deal with their own waste as far as practicable. However, costs, economies of scale and transport infrastructure dictate that a hierarchy of waste management facilities is necessary to achieve the optimum environmental balance, including some facilities that serve a wide area. It is an aim to achieve self-sufficiency at regional level which accounts for some Counties needing to import and export waste. Gloucestershire presently even exports some waste to south east England, outside the South West region, because that is where specialist recycling facilities are located. Thus, strategic (or regional) facilities should be the BPEO but that may not mean that they are necessarily the closest to the largest urban area when all factors are considered. Sections 5.3 to 5.9 also relate to this factor.
- 4.10.3 It seems more appropriate not to refer to the Schedule 1 sites in the Plan as "regional" as that should distinguish sites intended for a regional role from others. The "strategic" sites are intended to have a role related to the County and its surroundings. "Strategic" sites seem to me to reflect their primary purpose. This terminology seems to have much merit and reduce confusion so I will make a recommendation to that effect.

- 4.10.4 **"Large" and "small" scale provision** has been clarified in RDGWLP by the revised paragraph 4.5. The demarcation between the scale of site types is 50,000 tonnes per year capacity. This figure derives from the indicative threshold and criteria for installations for the disposal of non-hazardous waste likely to require Environmental Impact Assessment (EIA) for development at paragraph A36 of Annex A to Circular 2/99. This guidance amplifies the Town & Country Planning (Environmental Impact Assessment) Regulations 1999 SI No. 293 Schedule 2(11)(b). Facilities above 50,000 tonnes per year are now termed "strategic" and those below 50,000 tonnes per year "other" in RDGWLP. It would be helpful to briefly explain this demarcation by reference to EIA in this paragraph, cross referring it to RDGWLP paragraphs 5.115 & 5.116, and so clarify this potentially complicated requirement sufficiently for the Plan. I do not feel that there is a need to quote the EIA criteria more extensively, but reference could helpfully be made to Circular 2/99 in paragraph 5.116. It would also give more clarity if the General Development Criteria for Strategic Sites on page 46 of RDGWLP made clear that an Environmental Statement accompanies a planning application.
- 4.10.5 As I found during the inquiry, the title "other" for sites that are not included in Schedule 1 of RDGWLP is not clear, particularly where sites not selected in RDGWLP are being considered. This confusion becomes apparent, for example, in Policy 6 concerning "alternative" "other" sites. There are a number of terms that could be applied but, as these are non-strategic sites and are intended to make up a County wide network, calling them "local" or "district" sites might be more helpful. WPA31a provides a helpful redefinition of strategic sites in the glossary although it needs to reflect sustainability overall and not just within the County boundaries to accord with national policy. (Please see also section P1.4 of my report).
- 4.10.6 **Details of processes and types of waste** are helpfully described in the information sheets in Chapter 4 of the Plan. There is a balance to be struck in the amount of detail in these sheets. Please see section 4.8 of my report for my comments and recommendation on this point. Chapter 3 of the Plan addresses the types of waste that are foreseen as likely to be dealt with. Please see my report on Chapter 3 for the various changes I recommend. The indicative range of waste management options for each site provides the best chance of achieving BPEO as technology advances by making a broad preliminary, and provisional, assessment of the suitability of potential options.
- 4.10.7 **Environmental Impact Assessment**, where required, is specified in Regulations 2(1) and 3 of the Town & Country Planning (Environmental Impact Assessment) Regulations 1999 SI No. 293 as arising for consideration at the stage of a planning application. No other occasion is specified. However, in considering objections to the sites in Chapter 4 of RDGWLP, I have considered environmental impacts as far as I have been able to without having the details of a particular project before me. The WPA had environmental considerations very much in mind when drawing up Schedules 1 and 2 of the Plan (see WPA5 and documents referred to). It is therefore the case that environmental factors have received some consideration before the stage of an EIA being undertaken. However, as I have explained at section 4.3 and related parts of my report, this preliminary review does not bind a future, and more detailed, appraisal at the stage of a planning application. This applies to an omission site as much as to one in the preferred list.
- 4.10.8 **The 50,000 tonnes ceiling** on a Schedule 2 (District/Local) site is intended to be indicative of potential need and of potential for the BPEO of a smaller facility at that location. Operators or developers will have to demonstrate need and BPEO for any larger facility. If they can do so then this larger facility is what the County requires to fulfil its waste requirements. It would therefore be in the public interest for such a facility to go ahead. This could arise if the site selections in the Plan are not the best, or if the predictions are in error. Such factors would be material considerations that could outweigh the provisions of the development plan (including RDGWLP). If a 50,000 tonne facility is too large for a site and causes unacceptable environmental impact then planning permission should not be granted. My assessments in this Plan can only be broad ones. I do not feel that this requires

any change to RDGWLP which simply provides a framework of guidance to cover many variables and complexities.

## RECOMMENDATIONS

- 4.10.9** Amend the first sentence of paragraph 4.5 to read; “The sites are divided into two groups, “Strategic” and “District” (or “Local”) according to their capacity and the area that they are likely to serve.” Accordingly, where preferred sites are referred to throughout the Plan as “Other” amend their name to “District” (or “Local”) as appropriate.
- 4.10.10** Delete the second and third sentences of paragraph 4.5 and insert; “A benchmark capacity of 50,000 tonnes per annum, based upon the likely requirement for Environmental Impact Assessment (EIA) when planning permission is sought, is used to distinguish between “Strategic” (50,000 tonnes and above) and “District” (or “Local”) (below 50,000 tonnes) sites. EIA is explained further at paragraphs 5.115-6 of the Plan. Some sites will have just one waste management facility but larger ones could have a range of them.”
- 4.10.11** In paragraph 5.116 of the Plan delete the first sentence and substitute; “The Waste Planning Authority will take account of Regulations and Government guidance (currently the Town & Country Planning (Environmental Impact Assessment) Regulations 1999 (SI No. 293) and its amplifying Circular 2/99) in deciding whether to require an Environmental Statement when planning permission is sought.”
- 4.10.12** In the “General Development Criteria for Strategic Sites” on page 46 of RDGWLP second line of the first paragraph insert “planning” before “application” and give the text on that page appropriate paragraph numbers.
- 4.10.13** Insert the definition of Strategic Sites into the Glossary to read, “Sites identified under policy 4 or policy 6 of the Gloucestershire Waste Local Plan for major waste management development, processing more than 50,000 tonnes of waste per annum which is essential to the establishment of a sustainable waste management system.”

## 4.11 Paragraph 4.6

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/2      | RDS              | Friends of the Earth (Gloucestershire) |
| 62041/5      | RDS              | Stroud District Council                |
| 99020/5      | RDS              | Chaplin S M Mrs                        |
| 60509/2      | RDO              | Grundon (Waste) Ltd                    |
| 62542/4      | RDO              | Environmental Services Assoc.          |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) Reflect Structure Plan policy on energy from waste and sustainability.
- (ii) Reflect national waste strategy by removing the present inconsistency.

### Inspector's Reasoning and Conclusions

- 4.11.1** Gloucestershire Structure Plan policy WM5 provides for energy from waste facilities in or near to the Gloucester/Cheltenham area. This is based upon the Government's assessment in 1996 that energy from waste will increasingly represent the BPEO for the management of

many wastes. Policy WM5 of the Structure Plan complements policy WM2 (facilities network). Subsequent to publication of the Structure Plan, Waste Strategy 2000 (at paragraph 4.5 of Part 1) makes clear further Government guidance that recycling and composting should be explored before incineration with energy recovery is considered. This adds a requirement to implementation of Structure Plan policy WM2. I do not see it as making the policy inconsistent with the Waste Strategy in the sense that the policy cannot, or should not, be implemented. Waste Strategy 2000 explains (at paragraphs 5.57 et seq) the merits of energy from waste; the need for energy from waste to complement waste reduction, re-use and recycling; and the need to embrace more efficient and cleaner technologies as they are developed. This reflects the Structure Plan explanation of policy WM5 at its paragraph 12.5.10. Furthermore, Structure Plan policy WM1 seeks to ensure that waste management facilities are BPEO for the waste stream in question so implementing the waste hierarchy in Waste Strategy 2000.

- 4.11.2 The Development Plan for waste developments includes the Structure Plan and the Waste Local Plan. Structure Plan policy WM5 states that the provision will be made via land allocations and/or development control appraisal criteria set out in GWLP. It is therefore necessary and appropriate that the GWLP should explain the position as clearly as possible. I therefore recommend an amendment to RDGWLP to clearly reflect Waste Strategy 2000 along similar lines to that suggested in WPA 31.
- 4.11.3 Policy 1 of RDGWLP (BPEO) requires assessment of all waste management proposals according to a list of criteria that include, at Table 5.1, the objectives and guiding principles in chapter 2 of RDGWLP. This applies the waste hierarchy shown at figure 2.1 (as recommended to be amended – see my report recommendation 2.8.12) and places waste to energy recovery after recycling and composting. Table 5.1 also applies National Planning Guidance such as Waste Strategy 2000 which concerns waste arisings within, and beyond, the County boundary. The policy position is thus well covered in the application of RDGWLP to planning applications submitted to implement policy WM5 of the Structure Plan.

## RECOMMENDATION

- 4.11.4 Delete the second and third sentences of paragraph 4.6 and substitute; “The Structure Plan makes provision for a network of primary and secondary waste management facilities in the County including energy from waste facilities in or near to the Gloucester/Cheltenham area. These facilities will be subject to the provisions of this Plan, including the need to demonstrate BPEO and, for waste to energy plant proposals, prior consideration of recycling and composting options.”

## 4.12 Paragraph 4.8

### Comments

| Comments No. | Status (See Key) | Name                    |
|--------------|------------------|-------------------------|
| 88662/4      | DO               | Phelps Bros             |
| 62041/1      | DO               | Stroud District Council |
| 62063/7      | DO               | Swindon Borough Council |
| 89977/4      | DLO              | Kirby Jeff Dr           |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) Include site selection criteria and the detail of the application of these criteria to all sites.
- (ii) The list of preferred sites and waste management facilities are too broad.
- (iii) Reconcile waste requirements with the proposed facilities.

## Inspector's Reasoning and Conclusions

- 4.12.1 I agree with the need for improvement of site selection in the Plan. I have addressed this in a number of places elsewhere in my report (eg sections 2.18 and 3.10). Please see section 4.14 of my report below.
- 4.12.2 I address the philosophy of designating excess sites over waste requirement at section 4.15 of my report. The indicative range of waste management options for each site provides the minimum of prescription and the best chance of achieving BPEO as technology advances by making a broad preliminary, and provisional, assessment of the suitability of potential options. I cover reconciliation of arisings with sites at sections 3.9 and 3.10 of my report.

## RECOMMENDATIONS

- 4.12.3 Refine the site selection procedure as per recommendation 2.18.5.
- 4.12.4 No change to paragraph 4.8 of the Plan.

## 4.13 Paragraph 4.9

### Comments

| Comments No. | Status (See Key) | Name               |
|--------------|------------------|--------------------|
| 62569/19     | DO/W             | Environment Agency |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) — Provision of a fall back
- (ii) — Potential voidspace
- (iii) — Timing of implementation of proposals

## 4.14 Paragraph 4.10

### Comments

| Comments No. | Status (See Key) | Name                     |
|--------------|------------------|--------------------------|
| 66201/4      | DO               | Packwood Estates Limited |
| 65393/4      | DO               | Cypher S N Mr            |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) A sieve analysis should have been used for site selection.
- (ii) Civic amenity sites should have been selected consistently with PPG10 A50 & 51.

## Inspector's Reasoning and Conclusions

- 4.14.1 I also feel that the site selection procedure needs to be improved. I believe it should be more transparent, systematic and publicly auditable. Please see my report and recommendations at sections 2.18 and 3.10. The merits of selected sites to which there are

objections, including the Cotswold Business Park mentioned by Packwood Estates Ltd, are addressed later in this chapter of my report.

- 4.14.2 This paragraph of the Plan could usefully add a reference to an analysis of existing waste and other facilities and arisings. Inevitably the paragraph reflects what has been done for RDGWLP rather than what I am recommending should be done at the next stage in the Plan's evolution.
- 4.14.3 Gloucester City Council in its written submission during the inquiry is concerned that the selection procedure has resulted in an excessive number of sites in the city and in some sites being selected, such as Hempsted, with seriously unsuitable features. Cheltenham on the other hand has no sites within its town boundary yet has a greater population and generates more waste than Gloucester. Please see sections 4.1 and 4.15 of my report. I deal with the merits of the preferred sites later in my report.

## RECOMMENDATIONS

- 4.14.4 Refine the site selection procedure as per recommendation 2.18.5.
- 4.14.5 Amend paragraph 4.10 as per recommendation 2.18.6.
- 4.14.6 Add a new paragraph after the 2 paragraphs replacing RDGWLP paragraph 4.10 as per recommendation 2.18.7.

## 4.15 Paragraph 4.12

### Comments

| Comments No. | Status (See Key) | Name                    |
|--------------|------------------|-------------------------|
| 62043/3      | RDS              | Gloucester City Council |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Inspector's Reasoning and Conclusions

- 4.15.1 Although Gloucester City Council supports deletion of the linkage between Schedule 1 sites and a regional role in RDGWLP, it emphasises earlier objections of an over-provision of sites (GCY/W/5). The City Council clearly has a concern over the procedure for site selection which I believe would be alleviated by a more comprehensive accountable and comprehensible site selection system as I recommend in my report at paragraphs P1.1.8 to P1.1.10 and sections 2.18 and 3.10. The inquiry process orally examined the merits of almost all the proposed sites and their facilities for the purposes of the GWLP. My assessments are based simply on the evidence submitted and site inspections and are entirely detached from the procedural or contractual issues of concern to the City Council.
- 4.15.2 As regards the strategy of the Plan having an excess of identified sites over the predicted requirement, it seems to me that this is a sensible approach in the circumstances. It does not amount to granting planning permission for the sites and facilities that are identified but is simply indicative. However, selecting specific sites, as advised in PPG10, creates greater certainty and clarity in the waste planning process because these are the best sites identified to date. It avoids potentially appropriate sites being at a premium and creates a climate of competition between sites to achieve BPEO. The strategy also seems prudent when reliability of predictive data is so difficult to achieve for the necessary development lead times over the Plan period.



- 4.15.3 The penalty of “***grief and blight***” cited by the City Council can be overstated in my view. It is natural for people to prefer not to have waste, or indeed industrial or other, uses near to them and to object to proposals. But, if waste development is to be adequate in capacity and it is to be sustainable, then such uses need to be accepted close to, or within, urban areas as a matter of general public interest. On the other hand, they also need to be effectively regulated to ensure that any impacts are within a reasonable tolerance and the planning application and licensing processes are designed to achieve this. I have identified any facility or location objected to in the GWLP that seems obviously inappropriate. For these reasons I do not feel that any change is necessary to the Plan beyond my comments on the sites and facilities concerned.
- 4.15.4 In coming to this conclusion I am mindful of the City Council's mention of a “debacle” of the Hospital incinerator, that was eventually closed, and its opposition to incineration set out in its letter to the County Council of 27 March 1997. I am unable to make a proper assessment of the reasons for the Hospital incinerator's problems but it is the case that incineration technology, and emission standards, have greatly improved in recent years. Please see section 4.7 of my report.

## RECOMMENDATION

- 4.15.5 No change to paragraph 4.12 of the Plan as a result of these comments and objections.

## 4.16 Omission Sites

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88535/1      | DO               | Read G M Mr                            |
| 88662/6      | DO               | Phelps Bros                            |
| 60573/1      | DO/W             | Gloucestershire Sand and Gravel Co Ltd |
| 60503/1      | DO               | Hogarth Waste & Recycling              |
| 60496/1      | DO/W             | Valley Trading                         |
| 62042/7      | DO               | Cotswold District Council              |
| 62042/6      | DO/W             | Cotswold District Council              |
| 62042/5      | DO/W             | Cotswold District Council              |
| 62042/4      | DO               | Cotswold District Council              |
| 89364/5      | DO               | Duncliffe P E                          |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

- (i) Identify existing scrapyards and skip storage site (Phelps Bros, Sudmeadow Road, Gloucester) as a Schedule 1 or Schedule 2 site.
- (ii) Include the Playing Field Services Depot off Evenlode Road, Moreton-in-Marsh
- ~~(iii) Fire Services College land off Todenham Road~~
- ~~(iv) Introduce an on-site composting facility at the Fosse Cross site at Calmsden~~
- (v) Provide a ‘bulking up’ facility at Broadway Lane, South Cerney.
- ~~(vi) Wingmoor, Bishops Cleeve, should be included under Schedules 1 and 2~~
- (vii) Include Drymeadow Farm, Innsworth as a potential Waste Management Facility
- (viii) Wilderness Quarry, Mitcheldean should be a Schedule 2 site now and later Schedule 1.
- ~~(ix) Land adjoining Babdown Airfield Industrial Estate to be an Inert Recovery and Recycling Centre~~

## Inspector's Reasoning and Conclusions

- 4.16.1 **JG & G Phelps' Site, Sudmeadow Road, Gloucester** is shown as a scrapyard facility in RDGWLP Appendix 5 (No.69). The land owned by Phelps Bros and set out on the objection plan appears to be in 2 parcels. The scrapyard extends to about one hectare with a crusher and is contained behind corrugated sheet fencing. A further 3 ha or so of open land extends westwards. This open land accommodates some skips and has some evidence of concrete foundations but seems little used. It has little vegetation growing upon it but the trees in the wider landscape give it some protection from activities that could appear intrusive from a distance. The Severn Way passes close around the edge of this land beside the East Channel of the River Severn before it continues south alongside RDGWLP site 4. The scrapyard deals with some 140,000 tonnes of ferrous and 400 tonnes of non-ferrous scrap per year.
- 4.16.2 This land has the scope for expansion of the existing waste facilities, being some distance from residential development (except for the lone dwelling opposite the entrance gate), adjoining industrial development and having no environmental designation as a Landscape Conservation Area, like site 4. It is also outside the Key Wildlife Site which lies further to the northwest and which requires protection even though it forms part of site 4.
- 4.16.3 The Sudmeadow land generally is in a flood plain, which raises potential problems for all development in this area, although the degree of that risk is not clearly defined. Like the access to sites 4 and 14, Sudmeadow Road is not very wide and needs improvement but it is also prone to obstruction from parked vehicles. Although the WPA does not make its position clear, I feel that the clear distinction between the Phelps Bros site and other Sudmeadow sites is that Site 4 is very large; it already has extensive waste workings; and it has good scope for landscape protection around its extremities, including the wildlife area. Site 14 is set in amongst other industrial and waste development. In contrast the Phelps Bros land forms the exposed northeastern flank of the industrial area and does not seem large enough on its own to accommodate the comprehensive and substantial facilities that might be appropriate to a Schedule 1 site together with landscaping and wildlife buffer areas.
- 4.16.4 I therefore conclude that, although the site has merit and some potential for expansion of its present waste management facilities, the combination of access difficulties, its size and its flank location make it less advantageous than sites 4 and 14. Development of the Wildlife Site could alter this position. As there are more sites identified than are required in the Plan period, especially in and around Gloucester, and there is an element of flood risk, I do not feel justified in recommending the site's inclusion in Schedules 1 or 2.
- 4.16.5 I see no grounds for deleting a scrapyard (metals recycling) facility for site 4 whether the Phelps Bros site is included as a preferred site in the Plan or not.
- 4.16.6 Please also see sections 4.23 and 4.39 of my report on Sites 4 and 14 (Sudmeadow). The evidence presented at the hearing on these sites has influenced my judgement on this site.
- 4.16.7 **Playing Field Services Depot off Evenlode Road, Moreton-in-Marsh** has been included as an area of search in RDGWLP. Please see paragraph 4.31 of my report for comments on this.
- 4.16.8 No case is made by Cotswold District Council for a bulking up facility at **Broadway Lane, South Cerney**. It is simply a request that such a facility is provided.
- 4.16.9 It is right that, for the Plan to be sustainable, adequate waste management facilities need to be located near arisings in an integrated network (Please see sections 2.18 and 3.10 of my report). Cirencester is a significant generator of waste but it seems to have a bulking up facility already at Elliot Road, Love Lane, Cirencester (RDGWLP Appendix 5 No.77). I am not aware of any shortcoming with this facility. I must therefore agree with the WPA that, if such a facility becomes necessary in the Plan period, and the proposals are sustainable, then policies 10 and 12 will encourage them.

- 4.16.10 The objection does however raise the point touched upon in sections 2.18 and 3.10 of my report that there is no geographic and waste volume reconciliation between arisings, eg Cirencester and its surroundings, and the capacities and types of facilities in existence and those needed for the future. The southeastern half of the County attracts only a composting facility at Fosse Cross and a household waste recycling centre at Moreton-in-Marsh. There seem few facilities now (RDGWLP Appendix 5). I seriously question the adequacy of this provision from a sustainability viewpoint. My recommendations in sections 2.18 and 3.10 of my report cover this.
- 4.16.11 **Drymeadow Farm, Innsworth** is a licensed landfill/landraise site in RDGWLP Appendix 5 (No.38). Its recycling facility is, for some reason, omitted from the Plan but Hogarth Waste & Recycling says it has planning permission and can continue after landfill/landraise completes. The site covers about 5.7 ha. The Gloucestershire Way passes close to the north. The site is in an open flat area of landscape but is separated from residential development. The Innsworth Technology Park is nearby.
- 4.16.12 This site is located close to the outskirts of Gloucester but without ready access to the A40T. The site service road is also very poor. The latter problem could be overcome with construction of an improved access road but connection to the A40T needs more major works if busy urban roads are to be avoided. The traffic impact of any new facilities would require careful assessment. No details of expanded or new facilities are cited by the objector and the WPA does not believe the site has the required potential.
- 4.16.13 The site will continue under its present planning permissions and so fulfil a waste management role in the County during the Plan period. There are more sites in the Plan than are needed to fulfil the County's waste needs, especially from the Gloucester area, and this site is not obviously better overall than those on the list (please see my report on objections to the Gloucester sites and facilities below). I therefore do not feel it merits inclusion in this version of the Plan. However, this judgement is based on scant evidence, and in coming to my conclusion I am mindful that the Plan provides for sites not included on the lists to come forward, if they are the BPEO, under policy 6.
- 4.16.14 **Wilderness Quarry, Mitcheldean** is opposed by the WPA as a preferred site because it is not on any main waste transport corridor; it is not close by the main arisings in the Severn Vale; and it may attract waste from outside the County. The WPA therefore regards the site as an unsuitable location for new or expanded waste facilities during the Plan period but I do not agree.
- 4.16.15 I have the impression that the main reason for this site being excluded is the WPA's strong concern about attracting waste from outside its borders. As I have commented at sections 3.10 and 2.18 of my report, I feel that this degree of insularity is contrary to the guidance of PPG10. Although there is provision for any site to apply for planning permission under policy 6, that does not seem a sound reason to exclude a site that has as much, or greater, merit than one listed. It would be naïve to think that a site already in the Plan had no advantage over those excluded, especially when the Plan purports to list the range of sites that are preferred on merit. The WPA's approach that primary facilities should only be located in the Severn Vale also seems in conflict with Structure Plan policy WM2.
- 4.16.16 I agree with the WPA however that, as presently excavated, the quarry site, with a working area of about 1 ha, does not seem to have the scope for significant expansion of facilities appropriate for a strategic facility. The working area of the site is compact and it is not clear from my site inspection and the written submissions that the site could accommodate the range of facilities that might be appropriate for a strategic role even though it handles well over 50,000 tonnes of waste per year. On the other hand, the site seems to have an additional 0.5 ha or more that could be made available, and the working area could be re-organised, so it does seem to have scope for smaller scale facilities appropriate to Schedule 2 to complement, or replace, those now taking place. As the quarry is worked during the Plan period, more space will become available for waste operations.

- 4.16.17 Subject to submission of appropriate design details, the access does not seem to be so bad as to preclude the traffic that could be generated by a Schedule 2 role. I would need clearer evidence of shortcomings to find the site access unsuitable.
- 4.16.18 This quarry site seems very well located on the outskirts of Mitcheldean on the A4136, a route categorised in the Structure Plan as being of more than local importance, that passes through this very rural area and serves much of it. The 2 Primary Routes of the A40 and A48 are some distance away from this part of the County.
- 4.16.19 The quarry seems a distinctly more appropriate location for waste management facilities that are less “environmentally friendly” in character than are the selected sites on the pleasant Forest Vale Industrial Estate at Cinderford (site 15) 3.5 km to the south west. Cinderford is larger than Mitcheldean but the distance between them is relatively small in the context of local waste arisings which will come, not just from Cinderford, but also from Mitcheldean and a range of scattered small settlements. Cinderford and Mitcheldean are joined by the A4136 and the A4151, roads of similar strategic transportation importance.
- 4.16.20 Subject to the discipline of a detailed BPEO analysis required by RDGWLP policy 1, I see the new facilities at Mitcheldean improving the significant facilities already in place and complementing those proposed at Cinderford to serve the north west area of the County. No other locations are proposed for this apparently poorly served part of Gloucestershire. The area is very rural to Newent, Herefordshire about 9 km to the north, and also to Ross on Wye, Wales some 9 km to the west. I would expect these towns to be served by appropriate facilities in their own regions and not rely upon Gloucestershire without good reason and I have no evidence that these regions lack their own suitable sites. Nevertheless, cross border co-operation may be necessary here as I recommend in section 3.10 of my report.
- 4.16.21 For these reasons I conclude that Wilderness Quarry is not appropriate at this stage to be allocated as a Schedule 1 site but it does seem to have the capacity, and the important attributes, to be categorised as a Schedule 2 site. This categorisation seems to me to go some way to implementing Structure Plan policy WM2 for this part of the County as a secondary site. Waste to energy recovery, anaerobic digestion and composting are facilities sought and seem to have potential. Landfill is sought and seems to have merit to fill the quarry void at an appropriate stage. It would reduce travel to Gloucester or Lydney for local arisings. The WPA accepts that waste transfer has planning permission and should be reflected in RDGWLP Appendix 5. I believe this site is likely to reduce waste travel to the Severn Vale from the Forest of Dean area, as Mr Read suggests, and will therefore be more sustainable than the Plan's present proposals.

## RECOMMENDATIONS

- 4.16.22 Continue to omit the following sites from the Plan:
- JG & G Phelps' Site, Sudmeadow Road, Gloucester.
  - Drymeadow Farm, Innsworth.
- 4.16.14 Add Drymeadow Farm, Innsworth to the list of recycling sites at Appendix 5 of the Plan if it has planning permission, and is licensed, for that facility.
- 4.16.23 Add the following sites to the Schedule 2 list in the Plan
- Wilderness Quarry, Mitcheldean with the potential for waste to energy, recycling, waste transfer, anaerobic digestion, composting and landfill.
- 4.16.15 Add Wilderness Quarry, Mitcheldean to the list of waste transfer stations at Appendix 5 of the Plan.

## 4.17 Schedule One

### Comments

| Comments No. | Status (See Key) | Name                                 |
|--------------|------------------|--------------------------------------|
| 62604/6      | DO               | Gloucestershire Health Authority NHS |
| 87763/1      | DO               | Lubanski Peter J Mr                  |
| 87715/1      | RDS              | Arlington Property Developments Ltd  |
| 90121/2      | DLO              | Shaw David Mr                        |
| 61761/2      | RDS              | Hamfallow Parish Council             |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) It would be helpful to state with the Schedule One table that 'waste to energy recovery' is used to represent incineration and anaerobic digestion.
- (ii) Include at least one relatively remote location for the siting of major facilities such as incinerators.
- (iii) Considerations of objections to rural locations should consider whether people or the countryside (which may be landscaped to hide facilities) take priority.
- (iv) Include a commitment to landscape all waste sites by fully surrounding them with suitably tall trees.
- (v) Money would be better spent on increasing recycling initiatives and facilities.

### Inspector's Reasoning and Conclusions

- 4.17.1 The Information Sheet titled "**Waste to Energy Recovery** Synopsis" includes incineration and anaerobic digestion in its list. It might be helpful to cross refer readers to this and other sheets by a note on Schedules 1 and 2.
- 4.17.2 There is no suggested '**remote' location** for me to consider except perhaps under objections to Sharpness. Please see sections 2.18 and 3.10 of my report for my comment of concern on the general disposition of sites, including the apparent lack of them away from Gloucester. Please see section 4.26 of my report on Sharpness.
- 4.17.3 I do not see the Plan as determining whether **people or the countryside** take greater priority. Waste disposal is not so simple. I believe the answer to the point, as far as there is one, is to be found in the Key Objectives and Plan Strategy in Chapter 2 of the Plan.
- 4.17.4 The WPA has a duty under section 197 of the Town & Country Planning Act 1990 to make adequate provision for the **preservation or planting of trees** when granting planning permission. The Key Objectives in Chapter 2 of the Plan also emphasise the quality of the environment of which landscaping is an important element. It seems unnecessary to put this legislative provision in the Plan in Chapter 4 despite its importance. Please see also paragraph 4.1.24 of my report.
- 4.17.5 **Recycling** has a high priority but is unlikely to be able to cope with Gloucestershire's waste requirements over the Plan period. I therefore support the inclusion of a range of waste management options in Schedule 1. They are however options and are subject to the establishment of BPEO.

### RECOMMENDATION

- 4.17.6 Add a note on the Lists of Sites titled "Schedule 1" and "Schedule 2"; "Please see the information sheets on pages ..... to ..... for a brief review of the waste management options."

#### 4.18 RD Schedule One

##### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88537/2      | RDS              | Bovis Homes Ltd                        |
| 88713/3      | RDO              | Friends of the Earth (Gloucestershire) |
| 89808/1      | RDO              | Robert Hitchins Ltd                    |
| 89808/2      | RDO              | Robert Hitchins Ltd                    |
| 88538/1      | RDS              | Westbury Homes Ltd                     |
| 60509/3      | RDO              | Grundon (Waste) Ltd                    |
| 62637/5      | RDO              | Cory Environmental (Glos) Ltd          |
| 61998/3      | RDO              | British Waterways                      |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

##### Summary of Objections

- (i) Reinstate the proposal previously set out in Schedule One of the August 2000 Deposit Draft Plan for Sharpness Docks, including all the previously listed potential uses
- (ii) Object to the inclusion of waste to energy facilities at sites 1,2 and 5
- (iii) Schedule One is too prescriptive and limited on options for no apparent reason
- (iv) Restrict the range of potential uses at the Wingmoor Farm site to maintain Green Belt openness.

##### Inspector's Reasoning and Conclusions

- 4.18.1 I deal with the **Sharpness** objection at section 4.26 of my report.
- 4.18.2 I have commented upon the principle of **waste to energy facilities** at section 4.7 of my report and I deal with the issue of such facilities at sites 1, 2 and 5 when considering the objections to those sites at sections 4.20, 4.21 and 4.25 of my report.
- 4.18.3 I consider the potential for waste management **options for Schedule 1** under the objections against each of the sites in sections 4.20 to 4.26 of my report.
- 4.18.4 I deal with the **Wingmoor Farm** objection at sections 4.20 and 4.21 of my report.

##### RECOMMENDATION

- 4.18.5 My recommendations for any changes to RDGWLP Schedule 1 are made in sections 4.20 to 4.26 of my report.

#### 4.19 GDC for Strategic Facilities

##### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 62009/2      | DO/W             | Government Office for the South West   |
| 62637/4      | DO/W             | Cory Environmental (Glos) Ltd          |
| 99020/6      | RDO              | Chaplin S M Mrs                        |
| 99020/7      | RDS              | Chaplin S M Mrs                        |
| 88713/25     | DO               | Friends of the Earth (Gloucestershire) |
| 61775/3      | RDO              | Prestbury Parish Council               |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

### Initial Deposit

- (i) ——— Revise the wording of the last bullet point concerning alternative sites
- (ii) ——— Add the need to assess emissions to air and to land and the source of waste.
- (iii) ——— Clarify details of the requirement for EIA

### Revised Deposit

- (iv) ——— EIAs should be obligatory on all planning applications

## Inspector's Reasoning and Conclusions

- 4.19.1 The need to assess emissions and the source of the waste will arise under the first bullet point and will be required under policy 1 (BPEO). I see no need for the Plan to be amended.
- 4.19.2 The requirement for Environmental Impact Assessment is set out in detail by Government. Please see section 4.10 of my report. No justification is apparent for the GWLP to require any different regime to apply locally. Nevertheless, planning applications for waste management facilities that do not require an EIA will still be scrutinised and assessed for environmental impact before a decision is made.

## RECOMMENDATION

- 4.19.3 No change to this part of the Plan except as per recommendation 4.10.12.

## 4.20 Site 1 (Wingmoor Farm West, Sites A & B, Stoke Orchard/Bishop's Cleeve)

### Comments

| Comments No. | Status (See Key) | Name                           |
|--------------|------------------|--------------------------------|
| 61865/1      | DO               | Stoke Orchard Parish Council   |
| 88683/1      | DO               | Stewart Roy                    |
| 88825/3      | DO               | Weyers Janet                   |
| 87958/1      | DO               | Deconstruct                    |
| 62012/1      | DO/W             | Highways Agency                |
| 89808/17     | DO               | Robert Hitchins Ltd            |
| 61921/3      | DLS              | Bishops Cleeve Parish Council  |
| 61921/1      | DLO              | Bishops Cleeve Parish Council  |
| 90090/2      | DLO              | Watterston Dip LA C Ms         |
| 89806/1      | DS               | Wellington Park Properties Ltd |
| 88658/3      | DO               | Hannaford John                 |
| 88658/2      | DO               | Hannaford John                 |
| 89722/2      | DO               | Reed KJ Mr                     |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

- (i) ——— Incinerator plants would cause unacceptable pollution and infringe Human Rights

- (ii) 10,000 residents of Bishops Cleeve and Stoke Orchard would suffer health risks from an incinerator.
- (iii) The facility should be located well away from residential development
- (iv) Traffic problems will result from the Plan.
- (v) Access via Stoke Orchard is impracticable because of weight restriction and the narrow bridge.
- (vi) ~~The impact of the proposed facilities on the M5 and trunk road network need to be established~~
- (vii) The proposed facilities conflict with the Green Belt status of the site and its prominence in the landscape.
- (viii) A better area is proposed for an inert recovery and recycling and non-inert transfer facility

### Inspector's Reasoning and Conclusions

- 4.20.1 I deal with objections to incineration at section 4.7 of my report. I do not feel that the case is made out that incineration (or any other form of waste to energy technology) is fatally flawed as a waste management method because it is incapable of meeting the required safety standards, or that it is likely to be practicable for the Plan to rely entirely on waste minimisation, recycling and composting from now until 2012. Furthermore, there is a significant amount of development near Wingmoor Farm that could use the energy generated by a suitable waste to energy plant. The proximity principle applies strongly with substantial arisings close by at Bishop's Cleeve, Cheltenham and Gloucester and along the M5 corridor.
- 4.20.2 A waste to energy plant, or any other new waste management facility, would need to establish its credentials as the BPEO at any given time as compared to other sites and would have to comply with the safe operating limits imposed, and regulated by, the Environment Agency. Safe limits will be related to the occupiers of the scattered few houses near the site, the employees of nearby commercial premises, and residents from the housing in the urban area of Bishop's Cleeve and the smaller settlements around the site such as Gotherington and Brockhampton. I do not believe such a project, regulated in this way, would conflict with Human Rights.
- 4.20.3 Having said that I must observe that prevailing south westerly winds could blow dust, litter or fumes from the site over many people spoiling their amenity. Stoke Orchard Parish Council reports very unpleasant methane gas being smelled at times from the present landfill site or from site 2 to the east. Such effects from new facilities, for example composting, would be unacceptable and would need to be prevented by containment or other ameliorative measures by RDGWLP policy 36. It is therefore imperative that any new facility recognises the vulnerability of local people to these impacts and it is thoroughly designed and efficiently managed. New technologies have improved standards and it is my understanding that it cannot be said that the facilities listed would not meet the required limits. Thus there seems no reason to exclude anaerobic digestion from the range of potential facilities (paragraph 4.1.21 of my report also refers). I do not believe that new facilities would materially increase the risk of vermin nuisance bearing in mind the current uses of the site. This is a large and well-established waste management facility which needs to be used effectively but sensitively while it continues in use.
- 4.20.4 As to highway considerations, the site can be approached via Bishops Cleeve or via Stoke Orchard. I agree with the WPA that the Bishops Cleeve approach via the A435 should be used and not via Stoke Orchard. Access details of planning permissions reflect this requirement and there is a 17 tonne limit on traffic winding its way through Stoke Orchard. However, if Stoke Orchard Parish Council is right, this weight limit is often disregarded but abuse of the weight limit is a regulating matter for the Highway Authority rather than for this Plan.
- 4.20.5 I agree with Stoke Orchard and Bishop's Cleeve Parish Councils that, even if Stoke Road serves all the Wingmoor Farm sites from the A435 to the east, rather than from the west, this is far from satisfactory if new facilities are to be constructed. The railway bridge above Site 1 obstructs visibility of oncoming traffic and pedestrians and is not very wide. Stoke Road itself does not seem wide enough to allow for HGV's and cyclists or pedestrians. I found that



walking was very unpleasant along this generally flat and straight stretch of road forming a link between Stoke Orchard and Bishops Cleeve, even though the accident rate is recorded as being less than the national average. Traffic speeds tended to be quite high to walkers and passing lorries felt very intimidating. Cyclists would not be comfortable using this fairly busy road. There is likely to be an increase in HGV traffic as a result of the activities proposed for this site, at least until landfill diminishes, and possibly aggregated with that from sites 2 and RD18.

- 4.20.6 National and local policies seek more sustainable forms of transport and a reduction in environmental impacts. Approach to this site from the west along Stoke Road as set out in the site profile for Site 1 does not seem to me to be suitable for the reasons I have given. It also seems unsuitable from the east without improvements to its width and borders to enable cyclists or pedestrians to use it. There could also be problems caused by Hyde Lane being used to shorten the journey to the M5 junction 10 via the A4019. The WPA will seek a Transport Assessment for any application for planning permission in accordance with PPG13 paragraphs 23 to 27 and policy 39 of the Plan, which is a course I firmly endorse. The Site Profile needs amendment to reflect these measures if the site is to remain in the Plan.
- 4.20.7 Stoke Orchard Parish Council's concerns about mud on Stoke Road between Bishops Cleeve and the Wingmoor Farm East and South east sites seem to be due to a problem with one particular site. Clearly this is a serious matter but given the powers that exist under planning and highways legislation to resolve such difficulties I do not believe they form a cogent objection to the Waste Local Plan.
- 4.20.8 Site 1 has the main west coast railway line separating it from Site 2. This raises the possibility of a rail link as stated in the Site profile. However, evidence given during the Sharpness inquiry session cast doubt on the feasibility and cost of providing sidings at Wingmoor Farm because of their impact on the working of the main line. This aspect would require better definition when, and if, an application for a new facility were to be considered. If a rail link could be provided this would undoubtedly benefit the site significantly but the lack of it does not rule the site out as a Schedule 1 candidate if the road access can be improved.
- 4.20.9 The location of this site in the Green Belt is a substantial disadvantage as objectors point out. PPG2 Annex C provides for redevelopment and infilling of such sites but this will need to be undertaken with care to avoid further prejudicing Green Belt objectives. Environmental improvement should be sought. Construction of new buildings is likely to reduce openness unless there is some compensatory measure. Large buildings are likely to be needed for containment of noise, smell and dust and for some of the types of waste plant with potential. Consolidation of existing buildings and provision of demountable buildings tied to the life of the facility could provide solutions to the environmental difficulties.
- 4.20.10 The Plan does not make its strategy clear for this very substantial site, in view of its main function for landfill, which is of finite duration ending with site restoration. Bearing in mind the permanent character of the Green Belt and its objective to preserve openness, it seems to me that the Plan should be looking to eventually terminate waste management use of as much of the site as possible, especially on site A, albeit beyond this Plan period. I agree with Robert Hitchens Ltd that to place permanent buildings and uses on a Green Belt site that is designed to be restored and landscaped conflicts with Green Belt objectives. Very special circumstances, which could include the absence of alternative suitable and necessary facilities in the County, or perhaps elsewhere, would be required to demonstrate the case for new built development here. I believe this approach to be consistent with PPG10 Annex A paragraph A54. RDGWLP Policy RD25 also reflects this approach except that it does not make clear that facilities co-located with landfill while the landfill is active should not, without justification, provide a vehicle for waste development of a longer duration. (Section 5.73 of my report covers RD25.)
- 4.20.11 As there is an excess of capacity in the Plan, and there are other good candidates for strategic waste facilities in the County, I strongly advocate a cautious approach to redevelopment of sites A and B pending further refinement of the Plan. Co-location of waste management facilities with landfill may not be the optimum solution for a Green Belt site. I also feel that a reappraisal of the future of the site defining proposals for its redevelopment more closely for

the 5 year Plan Review would be appropriate. Boundaries for buildings and plant need to be shown on site A as has been done for site B. As an interim measure it seems more appropriate for the huge area of site A to be an area of search rather than a specific allocation for its whole extent. This would sit more comfortably with Structure Plan policy GB1 and seems to reflect the WPA's long term aim for site restoration (WPA 11 paragraph 4.9).

- 4.20.12 Because site B has buildings upon it already in use as a waste transfer station and it is a compact site, then it seems in a more advantageous category than site A. However, proposals to change the use of site B from waste transfer to commercial Class B2 and B8 in the Site Profile could lead to pressure for its waste facilities to transfer to site A, with prejudice to the Green Belt objectives, unless this function is accommodated elsewhere. The lawful use of site B, said by Wellington Park Properties Ltd to date from World War II origins, may also need clarification to avoid inappropriate prejudice to the Green Belt in the long term.
- 4.20.13 In view of my conclusions I feel it is inappropriate to construct permanent buildings on site A. This would tell against a waste to energy plant on site A but a modest plant may be feasible on site B. Other uses listed in Schedule 1 could be undertaken in demountable buildings, as the WPA acknowledges. There could be some consolidation of the buildings on site B. The Site Profile should mention this.
- 4.20.14 All the Wingmoor Farm sites are very visible in the wider landscape of the Severn Vale from higher ground, especially from the public viewpoint on Cleeve Hill along the Winchcombe Road (B4632). Close by the sites the flat land, hedges and embankments largely shield the sites from view. However, from the Cotswolds Area of Outstanding Natural Beauty they form part of an attractive and important landscape near to where people live. The sites are therefore sensitive to built development. This landscape prominence does not of itself rule out waste development but acts as a constraint on how, and where, it is undertaken and its extent.
- 4.20.15 As the extension to site 1 proposed by Deconstruct does not appear, on the brief evidence submitted, to be better than the extensive area already identified, I agree with the WPA that it should not be a preferred site. However, this does not preclude the Deconstruct site being proposed and considered under policy 6 of the Plan.
- 4.20.16 My overall conclusions on the objections to this site is that it should remain in the Plan with the potential waste management methods proposed but that development should not, without very good justification, extend built development in this Green Belt location beyond the life of landfill void space. I accept that the site is well placed strategically and is reasonably close to arisings but it has significant shortcomings in its highway approaches and its Green Belt limitations. The highway approaches are not that good for a strategic facility. The site also has competition from other strategic sites in the Plan that do not have these problems. Site B with its buildings seems to have better potential than site A, which is larger than necessary. Railway linkage could be of clear advantage if it were to be feasible.
- 4.20.17 There is a clerical error in the site location description referring to it as being at Stoke Orchard rather than Bishop's Cleeve.

## RECOMMENDATIONS

- 4.20.18 **Amend the site title in Schedule 1, the Inset Map, the Site Profile and Policy 4 by replacing "Stoke Orchard" with "Bishop's Cleeve".**
- 4.20.19 **Site Profile: Location: First sentence second line amend "south west" to read "south east".**
- 4.20.20 **Site Profile: Constraints: Access, delete the first sentence and substitute "Main access to the site by road is from Stoke Road from the A435 to the east. Stoke Road to the west is restricted to vehicles passing through of less than 17 tonnes."**

4.20.21 **Site Profile: Constraints: Proximity to Dwellings:** add “Settlements of Bishop’s Cleeve and Gotherington nearby to the north east, Brockhampton, Stoke Orchard and other small settlements around the south and west of the site.”

4.20.22 **Site Specific Criteria for Development:** add 3 new paragraphs after that on Hyde Brook as follows:

“New waste management facilities should be designed, and if necessary contained, to ensure that dust, odour, fumes, noise, litter and other effects do not have a materially adverse impact on nearby residents and businesses.”

“Stoke Road requires improvement from the site to its junction with the A435. Improvements are needed to Stoke Road for pedestrians and cyclists including to the railway bridge. A Transport Assessment for any application for planning permission will be sought in accordance with PPG13 paragraphs 23 to 27 assessing routes to connect with the M5, Cheltenham, Gloucester and Tewksbury.”

“The Green Belt status of the site may require demountable buildings to be provided on site A and their use limited to the duration of the landfill operations. Buildings on site B may need to be consolidated with those existing.”

4.20.23 Amend the **Inset Map 1** to show a broken line around Site A and in the decode box at the bottom of the map add an explanation of the dotted line “[ - - - Area of Search]” below “[ ----- Preferred Site]”.

4.20.24 Review the future waste management role of Site 1 in relation to the completion of its landfill function and in the context of Green Belt policies. Further develop the Site Profile in the light of the conclusions of this review.

4.20.25 The Deconstruct site should not be added to the list of preferred sites in Schedules 1 or 2.

4.20.26 Add anaerobic digestion to the list of potential waste management options in Schedule 1.

## 4.21 Site 2 (Wingmoor Farm East, Stoke Orchard/Bishop’s Cleeve)

### Comments

| Comments No. | Status (See Key) | Name                          |
|--------------|------------------|-------------------------------|
| 60509/8      | DO               | Grundon (Waste) Ltd           |
| 61865/2      | DO               | Stoke Orchard Parish Council  |
| 62012/2      | DO/W             | Highways Agency               |
| 89808/18     | DO               | Robert Hitchins Ltd           |
| 61921/4      | DLS              | Bishops Cleeve Parish Council |
| 61921/2      | DLO              | Bishops Cleeve Parish Council |
| 90090/3      | DLO              | Watterston Dip LA C Ms        |
| 88825/5      | DO               | Weyers Janet                  |
| 89722/3      | DO               | Reed KJ Mr                    |
| 88683/2      | DO               | Stewart Roy                   |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) Traffic problems will result from the Plan.

- (ii) The Plan should say that the site satisfies the Structure Plan criteria for strategic sites
- (iii) The Plan does not recognise the range of potential benefits on the site
- ~~(iv) Impact on M5 and trunk road network~~
- (v) Incinerator plants would cause unacceptable pollution and infringe Human Rights
- (vi) 10,000 residents of Bishops Cleeve and Stoke Orchard would suffer health risks from an incinerator.
- (vii) Access via Stoke Orchard is impracticable because of weight restriction and the narrow bridge.

### Inspector's Reasoning and Conclusions

- 4.21.1 Site 2 has similar attributes and disadvantages to site 1 but differs from it in one very important way. Site 2 is used for the extraction of minerals. This may offer longer term opportunities for waste development in worked out areas of the site pending restoration than for site 1 area A.
- 4.21.2 This site is that much closer to Bishop's Cleeve, so more people are potentially vulnerable to harmful emissions than for site 1. Nevertheless, for the reasons explained for site 1, I see no need to rule out waste to energy as a waste management method in principle. Closer proximity to a heat client makes this more feasible than otherwise and Grundon (Waste) Ltd points to energy use and other benefits from its production on site of light aggregates and building blocks plus the availability of plant to deal with special waste residues. I feel that the description of existing operations and Schedule 1 say enough to cover this.
- 4.21.3 My comments on amenity for site 1 apply here, as do those for highway, Green Belt and landscape concerns except that the railway bridge will not be directly affected by traffic accessing the site from the wider area. Site 2 has the railway running beside it so the possibility of rail connection seems to exist as for site 1. The site, at over 48 ha, is much larger than necessary and needs refinement as for site 1 area A. Anaerobic digestion could have potential on this site.
- 4.21.4 My overall conclusions on the objections to site 2 is that it should remain in the Plan with the potential waste management methods proposed but that development should not, without very good justification, extend built development in this Green Belt location beyond the life of the minerals working and landfill/landraise void space. I accept that the site is well placed strategically in the County, and it is reasonably close to arisings, but it has significant shortcomings in its highway approaches and in its Green Belt limitations. The highway approaches are not that good for 2 very extensive strategic facilities. It also has competition from other strategic sites in the Plan that do not have these problems. The worked out minerals void(s) could provide better potential than site 1 area A. Railway linkage could be of clear advantage if it were to be feasible.
- 4.21.5 There is a clerical error in the site location description in relation to Stoke Orchard.

### RECOMMENDATIONS

- 4.21.6 Amend the site title in Schedule 1, the Inset Map, the Site Profile and Policy 4 by replacing "Stoke Orchard" with "Bishop's Cleeve".
- 4.21.7 Site Profile: Location: First sentence second line amend "south west" to read "south east".
- 4.21.8 Site Profile: Constraints: Access, delete the first sentence and substitute "Main access to the site by road is from Stoke Road from the A435 to the east. Stoke Road to the west is restricted to vehicles passing through of less than 17 tonnes."
- 4.21.9 Site Profile: Constraints: Proximity to Dwellings: add "Settlements of Bishop's Cleeve and Gotherington nearby to the north east, Brockhampton, Stoke Orchard and other small settlements around the south and west of the site."

**4.21.10 Site Specific Criteria for Development:** add this category to the notes with the following paragraphs:

“New waste management facilities should be designed, and if necessary contained, to ensure that dust, odour, fumes, noise, litter and other effects do not have a materially adverse impact on nearby residents and businesses.”

“Stoke Road requires improvement from the site to its junction with the A435. Improvements are needed to Stoke Road for pedestrians and cyclists. A Transport Assessment for any application for planning permission will be sought in accordance with Policy 39 assessing routes to connect with the M5, Cheltenham, Gloucester and Tewksbury.”

“The Green Belt status of the site may require demountable buildings to be provided and their use limited to the duration of the minerals workings and landfill/landraise operations.”

**4.21.11 Amend the Inset Map 2 to show a broken line around Site 2 and in the decode box at the bottom of the map add an explanation of the dotted line “[ - - - Area of Search]” to replace “[ ----- Preferred Site]”.**

**4.21.12 Review the future waste management role of Site 1 in relation to the completion of its landfill function and in the context of Green Belt policies. Further develop the Site Profile in the light of the conclusions of this review.**

**4.21.13 Add anaerobic digestion to the list of potential waste management options in Schedule 1.**

**4.22 Site 3 (Gloucester Business Park, Brockworth)**

**Comments**

*For list of objectors and supporters see Appendix 1: Figure 5*

**Summary of Objections**

*Initial Deposit*

- (i) The Gloucester Business Park is not available or appropriate for waste use.
- (ii) Badgeworth Parish would suffer undue traffic and other environmental impact
- (iii) House prices would be depressed
- (iv) ~~Impact on M5 and A417~~
- (v) Waste facilities are inconsistent and incompatible with business uses on the Park
- (vi) Effect on countryside, nature conservation and landscape designations
- (vii) Impacts of pollution on health and the environment
- (viii) Vermin and insect infestation
- (ix) Hempsted would be a more economical location
- (x) The proposal sets a precedent in favour of waste to energy recovery; materials recovery; inert recovery and household waste; anaerobic digestion; waste transfer and composting – all inappropriate for the area
- (xi) Precautionary principle should pertain and presumes against this site
- (xii) The incinerator should be put on Sites 1,2,4,6,9 and 10 which are already blighted
- (xiii) Purchasers of properties have not been informed through local searches
- (xiv) Consultation and media advertising has not been sufficient
- (xv) The site would better used as a hotel, leisure centre, supermarket etc
- (xvi) Compensation should be paid to local residents
- (xvii) Reference to a strategic facility should be deleted, however the inclusion of an ‘other’ waste management facility at the site could be retained

*Revised Deposit*

- (xviii) Object to removal of site 3 as a strategic site in RDGWLP

**Inspector's Reasoning and Conclusions**

- 4.22.1 The Revised Deposit version of the Plan removed this site from Schedule 1 as a strategic facility and instead categorised it as a smaller facility in Schedule 2 of the Plan. I deal with most of the objections to site 3 under site RD3 at section 4.30 of my report. Other objections I deal with below.
- 4.22.2 Please see my report at section 4.24 on site 4, Sudmeadow, Hempsted.
- 4.22.3 Please see my report on sites 1, 2, 4, 6, 9 and 10 on incineration on those sites.
- 4.22.4 The Plan seems to have gone through its statutory stages and complied with the relevant legislation. Public consultation and publication of its proposals has taken place, which I believe has been adequate. The public inquiry has been held which has enabled representations to be made by those who wish to do so. If searches and other investigations during conveyancing transactions have not revealed the existence of this Plan this seems to be a matter for those involved with the transactions and the appropriate local authorities. It is not a matter for me to comment upon. It is difficult to see what more could have reasonably been done to brief the public than has been done.
- 4.22.5 The Planning legislation does not provide for compensation for those affected by the development proposed in this Plan.

**RECOMMENDATIONS**

- 4.22.6 No change to the Plan except as under section 4.30 of my report.

**4.23 Site 4 (Sudmeadow, Hempsted)**

**Comments**

| Comments No. | Status (See Key) | Name                                      |
|--------------|------------------|---|
| 63039/5      | DO               | Vision 21 Waste & Pollution Working Group |
| 62016/2      | DO               | Gloucestershire Wildlife Trust            |
| 62043/2      | DO/W             | Gloucester City Council                   |
| 88658/6      | DO               | Hannaford John                            |
| 92465/1      | DLO              | Forest of Dean Conservative Association   |
| 88713/4      | RDS              | Friends of the Earth (Gloucestershire)    |
| 62041/5      | DS               | Stroud District Council                   |
| 86845/1      | DO               | Compton J N Mrs                           |
| 87283/1      | DO               | Cotswold Business Supplies                |
| 65393/2      | DO               | Cypher S N Mr                             |
| 62613/33     | DO               | Hempsted Residents Association            |
| 62613/28     | DO               | Hempsted Residents Association            |
| 62613/51     | DO               | Hempsted Residents Association            |
| 61610/2      | DO               | Minsterworth Parish Council               |
| 61768/7      | DO               | Friends of the Earth (FoD)                |
| 88662/5      | DO               | Phelps Bros                               |
| 62043/9      | DO               | Gloucester City Council                   |
| 89749/1      | DLO              | Goscomb P M                               |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

- (i) Fly and rat infestation
- (ii) Waterfront redevelopment incompatible with incinerator
- (iii) Support removal of incineration from Deposit version of Plan
- (iv) Highway system is unsuitable
- (v) Location on floodplain
- (vi) Pollution impacts unacceptable
- (vii) Effect on environment, nature conservation designation and landscape setting of Severn
- (viii) Visual impact unacceptable
- (ix) Delete potential for scrap yard

## Inspector's Reasoning and Conclusions

- 4.23.1 The allocation of this site has changed in 2 respects between the Deposit and Revised Deposit versions of the Plan. In the RDGWLP, waste to energy has been removed as a potential waste management method. Also, the designation of the north eastern corner of the site, beside the lower parting of the River Severn, as a Key Wildlife Site has been added to the Map.
- 4.23.2 Stroud District Council supports site 4 as a strategic facility with waste to energy amongst its potential waste management methods. I therefore feel I should comment on the exclusion of waste to energy from this site as a matter of principle in response to Stroud District Council's submission.
- 4.23.3 I explain my view on the principle of waste to energy technology at various parts of my report but particularly at section 4.7. My view conflicts with that of Gloucester City Council, which is vehemently against waste to energy technology in the County and particularly so for all the City sites and particularly Sudmeadow. I believe the City's opposition to be heavily influenced by the bad experience with its old hospital incinerator that is no longer operational and by suspicions about waste contracts having an inappropriate influence on waste management methods. I do not bring either of these matters into my approach except to the extent that I am aware that many old incinerators are unable to meet modern standards and have become obsolete.
- 4.23.4 It seems to me that removal of waste to energy technology on a strategic site is to deny an important potential option that may well be in the general public interest to provide. This could reduce the value of the site as a strategic facility. It certainly does not improve it. Energy in the form of gas is being recovered from Sudmeadow now and will be for some time. If the waste to energy option is to be excluded here then it should be excluded for cogent reasons. The reasons given are its impact on the flood plain and visual amenity. As I explain below, it is unclear to me why, with such an extensive site and industrial and waste development taking place in and around the site and likely to do so for some time, that flooding and visual impact rule out the potential of waste to energy technology but have not ruled out other forms of development, a point picked up by the City Council.
- 4.23.5 I believe the issue needs to be looked at in the light of the Plan as a whole. All the Schedule 1 strategic sites have come in for a barrage of criticism. All the Schedule 2 sites are subject to objection. The Gloucester Business Park and other urban sites have all been fiercely objected to leading to site 3 being downgraded from Schedule 1 to Schedule 2. Amongst those who have felt strongly enough to want to make submissions to the Plan, few are content with waste development near people. Yet waste needs to be dealt with in a sustainable way. Strategic sites such as Wingmoor Farm sites 1 and 2 have an important Green Belt obstacle to substantial strategic development. This places more importance on Sudmeadow and other sites. I feel that a judgement needs to be made whether Sudmeadow is going to be a strategic waste site for a long enough term to attract the facilities appropriate to such a site. If so I believe it should have a full range of options including waste to energy. However, I have reservations about the long-term suitability of this site which I believe needs further consideration by the County and City Councils. I explain this further in section 4.24 of my report.

4.23.6 The other objections made to site 4 are also addressed in section 4.24 of my report.

## RECOMMENDATION

4.23.7 When the Plan is formally reviewed, reconsider whether Sudmeadow should remain a strategic site. If it is to remain a strategic site then waste to energy should be included in its range of potential waste management methods.

## 4.24 Site RD4 (Sudmeadow, Hempsted)

### Comments

| Comments No. | Status (See Key) | Name                    |
|--------------|------------------|-------------------------|
| 62043/5      | RDO              | Gloucester City Council |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) The area of the site designated as a Key Wildlife Site and Site of Nature Conservation Interest does not have any consent for use, it is a greenfield site and should be deleted.
- (ii) The site is not suitable for a Schedule 1 use.
- (iii) Landscape and flooding issues are as pertinent to other waste uses besides EfW.

### Inspector's Reasoning and Conclusions

- 4.24.1 It is clear that the **landscape impact** of development at Sudmeadow is very important from the report of my colleague on the City of Gloucester Local Plan 1993 and from the comments of the Structure Plan EIP Panel cited by the City Council and from the local plan itself. However, from my critical viewing of Sudmeadow from a range of near and distant viewpoints on different occasions, it seems to me that parts of this very large waste site, all of which is designated as a Landscape Conservation Area, are of less importance than others. This designation has been applied in the Gloucester Local Plan notwithstanding the extensive, and continuing, use of Sudmeadow for waste facilities. There is thus an element of conflict inherent in the 2 plans and the 2 authorities are clearly not in harmony on the issue.
- 4.24.2 Much of the site has the backdrop of a mass of Class B2/B8 industrial development which is set for expansion in the City's Local Plan (1996) (CD28) under policy E1 and as site EC2 in the emerging plan (CD22). There is housing proposed in a prominent and higher location on land at the Ministry of Defence Oil Storage Depot towards Hempsted village. Gloucester Cathedral and Robinswood Hill occupy narrow sections of the landscape and there are other parts of the City's townscape that do not seem to be of similar aesthetic value. The waste development on the southern end of the site has large prominent mounds around a bowl where development could be hidden from view. This is where the Civic Amenity Site is now located and where the WPA now says any major waste development of the site will be confined (WPA13a & WPA31a). Distant views of the City from some points along the A48 and the Gloucestershire Way are shielded by trees and hedgerows in the intervening countryside. Pylons detract from some aspects. Pylons also seem to dominate views from Telford's overbridge and hedgerow trees also provide a degree of screening.
- 4.24.3 There are thus areas of this extensive strategic site where waste development would not seem to fatally compromise the quality of important views of the City. However, my perception seems to be at variance with the City Council's reported appraisal in preparation for the emerging City Local Plan (which was not submitted as evidence). It would be



helpful if any less important areas, and strategic views, were more clearly defined in the Local Plan and given effect in the GWLP. They do not seem to be confined to the Civic Amenity Site bowl, which is designated as landfill void space at present (CRY/W/1). I also believe that an imaginative and carefully planned landscaping scheme on the restored waste sites would complement waste development and help to achieve the City Council's aim of environmental improvement under policy BE4 of its 1996 Plan (CD28) - brought forward into policy BE2 of the emerging plan (CD22). No such landscape plan is apparent from the evidence. Achievement of a satisfactory arrangement from a landscape viewpoint is made easier by Sudmeadow lying relatively low, below general views of the City's prominent buildings and important locations.

- 4.24.4 In this way the requirements of the WPA for waste management and those of the City Council for environmental improvement may be reconcilable. This does not invite general urban sprawl. My conclusion assumes that there is a continuing need for waste development of this site and that it will be sensitively designed, sited and landscaped. This includes any waste to energy facility if my recommendation on this is accepted. It follows from this analysis that these less sensitive areas should be identified by the 2 Councils and delineated in the GWLP in place of the whole site area. The remainder of the site area will simply continue under existing permissions.
- 4.24.5 The site is within the 1947 flood plain. Given climate change predictions, aired particularly by Friends of the Earth (Forest of Dean), I have misgivings about the long-term future of the site for waste development. It also seems that the low-lying bowl favoured by the WPA could be at the greatest risk of flooding which would seriously undermine its selection as a favoured location for landscape reasons. This risk applies to any development and not just waste to energy and is potentially polluting as objectors say.
- 4.24.6 Nevertheless, the evidence of flood risk does not demonstrate that the potential facilities in the RDGWLP could not function effectively on some parts of the site during the relatively short Plan period. The Landfill Directive will need to be complied with in any event. I also note from the emerging City Local Plan that further (undefined) flood defence work is to be undertaken. Works are also intended to restore some of the flood plain in the Key Wildlife Area. I therefore do not have grounds to suggest that flood risk is sufficient to warrant removing the site from the Plan other than the Wildlife Area. On the other hand, the risk, and the potential need for further flood prevention works, tells against the sustainability of the site compared to others and makes it less likely to attract sufficient investment for a strategic range of facilities unless the risk can be eliminated by better evidence, or measures, than have been submitted to me. As PPG25 paragraph 51 and Structure Plan Policy F1 advise, flood risk areas should be shown on Local Plans.
- 4.24.7 Safeguarding amenity is a key concern of Hempsted Residents Association. Although waste operations have improved since 1994 decreasing smells, flies and noise, before that time it was bad. A proposed increase in activities on a strategic site are seen by HRA as having the potential to bring back serious problems for local residents. Friends of the Earth Forest of Dean are also concerned for walkers of the Severn Way passing on the riverside of the site. The impact of development would be exacerbated by the atmospheric characteristics of the riverside location according to HRA.
- 4.24.8 I agree with the WPA that HRA's concerns, although understandable, are largely unfounded. For the Plan period this site will continue under present permissions, industrial development will expand, and the road will be improved before strategic waste facilities are permitted. Any new facility will then need to conform to a good standard of environmental impact under the BPEO regime. As HRA suggests, noise emissions may require a restriction on hours or levels, or acoustic insulation or some other measure may be needed even though there is a prevailing climate of noise experienced now in Honeythorne Close, for example, from road, rail and waste and industrial activities. Likewise, odour, fumes, smoke, dust, vibration and other emissions may need controls, especially given the prevailing downwind direction of the urban area. I agree with the WPA that many waste uses need to be contained within buildings to achieve best results. However, these are

matters to be considered at the stage of detailed applications in the context of policies 36 and 37 (sections 5.74 to 5.78 of my report).

- 4.24.9 On the other hand I am concerned about the part of the site adjacent to proposed housing at the Old MOD Oil Depot. I feel it is inappropriate to place industrial uses other than Class B1 so close to housing and I would not put waste uses into that category. This is yet another example of where the 2 authorities are at odds. If the proposed housing goes ahead I believe this part of site 4, erroneously excluded from the Landscape Conservation Area, should be removed. For the remainder of the site, its size, shape, contours, and the distance to housing provide sufficient protection so that people's amenity would not be materially harmed provided new facilities are carefully and sensitively designed in compliance with the Plan's objectives. This includes hygiene standards to deter infestation by vermin and flies.
- 4.24.10 My only reservation on amenity apart from proximity to the proposed housing is the alleged unusual atmospheric characteristics of this site which traps smells, fumes and dust. I received only anecdotal evidence of this from Rev. Newell of HRA. However, I respect his opinion based upon his professional knowledge and long local experience. Temperature inversion is not an uncommon phenomenon in river valleys as I know from my own experience. Nevertheless, this factor will need to be supported by cogent evidence to establish and define its effects when an application is considered if it is to restrict development. Dispersion modelling of any discharge to air of potential pollutants will also be required to take account of the local environmental characteristics.
- 4.24.11 Threats to nature conservation are alleged by development of the Key Wildlife Site and Site of Nature Conservation Interest beside the Lower Parting of the River Severn and from airborne pollution or by pollution from floodwater. Sudmeadow is part of the river identified as a Prime Biodiversity Area for the emerging Gloucester Local Plan.
- 4.24.12 Incineration is of particular concern to some objectors, which I have addressed at section 4.23. This would be for the Environment Agency to regulate. I see no special reason to preclude waste to energy on this site for an effectively regulated process.
- 4.24.13 My comments above on flooding apply equally to pollution caused by it. A risk analysis would be needed in any application for planning permission or a process permit. The WPA does not see the Wildlife Area being developed for waste. I support this and propose it be excluded from the Plan. The present waste uses do not seem to have materially harmed nature conservation interests so I see no other reason to preclude the site from Schedule 1.
- 4.24.14 It is common ground that access is a problem until the Gloucester South West By-pass is completed. The Plan expects a new access for a strategic facility. At the inquiry completion of the by-pass was estimated to be in 2005 (WPA13b). Its design is likely to allow free flow of traffic during normal office working hours but congestion is predicted during peak commuting times. There could also be congestion resulting from cost balance decisions and if there is not a modal shift to more sustainable forms of transport. This means that a strategic facility will not become operational until well into the Plan period at the earliest and that transport links to this site may not be without difficulty.
- 4.24.15 Friends of the Earth (Forest of Dean) point to local planned improvements such as regeneration of the Docks and the move of Gloucester College to Llanthony Priory and the importance of the locality for tourism. I acknowledge these points but the context for the site is also continuing extensive waste development under present permissions, significant existing and planned industrial development beside the site, and a need to find major waste sites near arisings. Therefore, while waste development on this site should respect these factors as far as possible, they do not preclude the site as a candidate for further waste development in competition with other sites.
- 4.24.16 I do not agree with Gloucester City Council that the allocation of relevant parts of this site for waste use will cause blight. Please see paragraphs 4.15.3-4 of my report. The extensive waste activities have not put off present and proposed local industrial and housing

development. I saw no signs of blight in the neighbourhood and I believe that the criticism is overstated. I accept that people would prefer not to have waste uses near them and that in the past, waste development has not achieved the standards that are now being sought and met. I believe the WPA is determined to do its best to restore public confidence in waste development. Alleged failures by the Environment Agency as Regulating Authority are not a matter for me (PPG23 paragraph 1.34).

- 4.24.17 Cory's concern that the WPA does not regard the Plan as conferring upon this, and other, preferred sites a **presumption in favour of development** is, I believe, misplaced. As paragraph 4.13 of RDGWLP states, "...inclusion in the list (of preferred sites) does not imply that a planning permission will automatically be granted ....." What the Plan does in selecting these sites is to publish a range of sites that appear to be the best selection at the time the Plan is adopted and that merit safeguarding in accordance with RDGWLP policy 7. The problem is, particularly for this first site-specific Plan, that it is not clear that the selected sites are, or will remain, the best. This is either because the site selection process may have overlooked, or not credited, better sites, or because of such changes as advancing technology, in the environment or in policy. A presumption in favour of development seems therefore to go further than the Plan intends. However, because the selected sites have been subject to some scrutiny in the face of objections, they will have some advantage to the extent that they are not obviously found wanting. They are the preferred sites pending any better sites being identified.
- 4.24.18 My **overall conclusion** on Site 4 Sudmeadow is that, like the Wingmoor Farm sites, it has grown from historic waste use origins, it is in a very sensitive location and, at 142 ha, is a much larger area of land than is needed for a strategic range of facilities. The City Council's argument that the site should be restored after landfill/landraise is complete and should become a landscaped area because of its ecological and amenity importance under policy NL1(g) of the 1996 Local Plan seems a cogent one. Further strategic waste facilities also need to await the major road improvement scheme. The site may well have a serious shortcoming for the longer term in flood risk and atmospheric conditions. It could be prone to structural difficulties and extra expense for a major facility because of its load bearing characteristics. Undertakers of major development need to make decisions that exceed the duration of the Plan.
- 4.24.19 I therefore feel that the area should be one of search, rather than comprehensive allocation; that the favoured location of waste facilities should be more closely identified in the Review of the Plan; and that the long-term future of the site should be reconsidered as a strategic facility. The conflict between the County and City Councils over the future of Sudmeadow should be resolved through the emerging Gloucester Local Plan. I do not recommend deletion of site 4 from Schedule 1 of the GWLP now because it is a very active waste site, it has excellent proximity to arisings and it seems to have significant potential for the Plan period employing demountable facilities. The City of Gloucester also needs to have good, and ready, access to a sustainable strategic facility. However, the Sudmeadow landfill may be complete by 2013, or earlier, and there is an excess of sites over requirement, so the justification for a range of permanent major facilities at Sudmeadow is not convincing on present evidence. In 5 years time the position may well be very different, including completion of the road improvements, progress of landfill and possible development of strategic waste facilities elsewhere. Just because the site has historic origins and current waste activities tied to landfill does not seem a good reason to perpetuate waste activity if it is unsustainable in this location. The suggestion of my colleague in his preamble to recommendation 17 of his report on the Gloucester Local Plan 1993 (GCY/W/2 paragraph 2.3) may well be the best way forward. I have recommended at paragraph 4.23.7 of my report that the potential of waste to energy should be reconsidered for this site when the Plan is eventually reviewed if it is to remain a strategic site. The fact that the WPA considers waste to energy unsuitable for this strategic site suggests to me that site selection is not robust in this case.
- 4.24.20 This analysis should be read with those for the other strategic sites.

## RECOMMENDATIONS

- 4.24.21 Show Flood Risk Areas on the Site Plan for Sudmeadow and give a clearer explanation in the Site Profile about flood risk to the site.
- 4.24.22 The long term future of Site 4 be reviewed to decide whether it should be restored after landfill/landraise operations and landscaped to serve a planning purpose as an amenity and, or, ecological area, or whether it should be permanently developed for specified uses in whole or in part.
- 4.24.23 The site area on Inset Map RD4 should exclude the Key Wildlife Area and should be delineated by a dotted line and designated an area of search. The box describing the delineation as a “preferred site” should be replaced by “area of search”.
- 4.24.24 Include the area of land on the eastern flank of the site opposite the MOD Oil Storage Depot within the Landscape Conservation Area as designated in the 1996 City of Gloucester Local Plan.
- 4.24.25 Amend the Site Profile to indicate the estimated completion of landfill; that the site's long term future is under review; until that review is completed development will be restricted to the life of the landfill; and that landscape impact and flood risk assessments will be required.

#### 4.25 Site 5 (Javelin Park – former Moreton Valence Airfield)

##### Comments

| Comments No. | Status (See Key) | Name                      |
|--------------|------------------|---------------------------|
| 61777/1      | DO               | Haresfield Parish Council |
| 61652/1      | DO               | Drew MP David Mr          |
| 62041/3      | DO               | Stroud District Council   |
| 62012/4      | DO               | Highways Agency           |
| 62043/10     | DO               | Gloucester City Council   |
| 88658/4      | DO               | Hannaford John            |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

##### Summary of Objections

- (i) Incineration is unacceptable on this site
- (ii) This should not be a strategic site
- (iii) The site is too close to Gloucester and planned housing nearby
- (iv) It would harm nature conservation interests and views from the Cotswolds AONB
- (v) Traffic will increase in rural villages and roads
- (vi) Consider this site only after all other proposals have been decided
- (vii) The impact on trunk road network must be established before development is permitted
- (viii) The site is not well related to waste arisings

##### Inspector's Reasoning and Conclusions

- 4.25.1 The Plan allocates this former part of Moreton Valence Airfield site for a strategic (or County-wide) facility with potential for all waste management facilities except for landfill/landraise. There is said to be a waste transfer/materials recovery facility on the site but I did not see it. The 11.2 ha site accommodates very large hangar buildings and an extensive strip of tarmac runway and open land. The site is in use for storage and distribution purposes. It is an industrial estate known as “Javelin Park”. It lies very close to junction 12 of the M5 in flat open countryside and next to a garden centre. RAF Quedgley,

where 2,000 or more houses are planned, is situated about 1 km to the north east. Hunts Grove, where 1500 houses are proposed, is a similar distance to the west/south west.

- 4.25.2 Mr Drew MP very strongly advocates that incineration should not be employed on this site (and at Sharpness) because of the lack of general public acceptance of this waste management method. A comprehensive network of recycling and composting facilities would be a better way in his view. This proposition is an attractive way forward when it can be made economic and implemented and the Plan reflects this as a priority through application of the waste hierarchy in assessing projects. However, as I conclude at sections 4.7 and 4.9 and elsewhere in my report, I do not feel that the case is made out that incineration (or other forms of waste to energy) is fatally flawed as a waste management method, or that it will be practicable to rely entirely on recycling and composting during the Plan period. Furthermore, the prospect of a large mass of housing near this site makes a waste to energy plant a much more feasible proposition because it would be easier to recover the energy for use in the proposed development. The proximity principle will also apply more strongly than it does at present with substantial arisings close by.
- 4.25.3 A waste to energy plant, or any other waste management facility, would need to establish its credentials as the BPEO at any given time as compared to other sites and would have to comply with the safe operating limits imposed and regulated by the Environment Agency. The Agency's requirements will allow for new and present housing, and for harm to animals in agriculture and in nature.
- 4.25.4 The site's ready access to the M5 is another very strong point in its favour as a strategic site accepting waste from wider distances over arterial roads. The site is close to Gloucester and the M5 provides links to Stroud, Cheltenham and Tewksbury. The Highways Agency would need to be satisfied that the operational efficiency of the M5 would not be impaired as a result of any scheme and measures would be needed to protect the B4008 connecting rural villages from being used by heavy traffic instead of major routes. Restrictive measures have been considered for the B4008, including imposing a weight limit, as have the need for highway improvements close to the site. Upgrading work to junction 12 now underway is due to complete at the end of 2002. An application would be subject to a Transport Assessment in accordance with PPG13 paragraphs 23 to 27 and RDGWLP policy 39. The site therefore seems potentially feasible from a highway viewpoint.
- 4.25.5 The site is in an open landscape and the substantial ex-hangar buildings are conspicuous from viewpoints such as Haresfield Beacon and from the M5. It is allocated as industrial land so further large scale industrial development on the site can be expected. In that context I do not feel that a sensitively designed waste management facility should be objectionable, particularly if appropriate landscaping was also undertaken to mitigate visual impact. To my mind the large area of the site remaining for development provides considerable scope for a range of schemes appropriate for a strategic facility. Five ha is said to be an ample area for this.
- 4.25.6 I therefore feel that the waste management facility is capable of conforming to Structure Plan policies WM2 and WM5, RPG10 policies RE5 (third bullet point) and RE6, and PPG10 and has the potential, in the general public interest, to become a strategic site for the methods listed.

## RECOMMENDATIONS

- 4.25.7 **Retain Site 5 and its waste management options in the Plan.**
- 4.25.8 **Add to the Site Profile for Site 5 under "Constraints" and "Access" at the end of the present paragraph, "A Transport Assessment for any application for planning permission will be sought in accordance with Policy 39 assessing routes to connect with the M5, Cheltenham, Gloucester and Stroud."**

trips. Sharpness is also served by a railway in current use and with potential for expansion. Water and rail infrastructure offers the potential for a wide waste catchment.

- 4.26.3 A capacity of 100,000 tonnes per year is necessary to achieve viability, which exceeds Gloucester's arisings. Cory envisages a capability of 150,000 tonnes of MSW per year from various sources.
- 4.26.4 The objections to incineration on the site raised by the WPA, supported by the Wildfowl & Wetlands Trust, FEG, Mr Drew MP and others in writing, include harm to the ecology of the Severn Estuary; harm to local residents, to tourism, to regeneration and to the visual appearance of the Docks area. A public perception of fear of harm appears to be prevalent. I address objections to the principle of incineration and waste to energy technologies in sections 4.7 and 4.9 of my report. I also refer to the merits of Sharpness as a regional facility at sections 2.11 and 2.15 of my report in the context of the proximity principle. I feel it is relevant in the context of the local plan to consider the potential of the site as a candidate for a regional facility for the future should that accord with the strategy and conclusions of the RTAB. This is because, if the site is rejected after consideration of its potential as a strategic site, then its regional potential could also be lost.

#### Nature Conservation

- 4.26.5 Doubt is cast on the accuracy of the demarcations and designations of environmental information on the RDGWLP Inset Map. There are several designations. It appears that the proposed revision in WPA 31 is incomplete. The Inset Map for RD23 is better but still contains errors of detail. The WPA should recheck these designations and revise the Inset Map for Sharpness accordingly.
- 4.26.6 During the inquiry FEG and Mr Drew presented a strong case that incineration has the potential to be extremely harmful generally and specifically on this site. The WPA's expert had reservations. They all believe that incineration needs to be approached with the utmost care and the application of the precautionary principle. They point to a plethora of local sensitive receptors such as local flora and fauna, drinking water and agricultural land. In FEG's view that makes incineration unacceptable. Mr Drew focused chiefly on the effects on people but for FEG, nature conservation interests were seen as being at particular risk. The WWT Slimbridge sanctuary nearby is an important ecological resource (WPA15 Appendix 8) for the estuarine RAMSAR/SPA sites and there is a small proposed wildlife area within the port in the emerging Stroud Local Plan that overlays potential housing and employment areas.
- 4.26.7 The importance of, and the need to protect, the ecology of the area and the need for application of the precautionary principle are not at issue. They are emphasised by English Nature. I have concluded elsewhere in my report on the acceptability of waste to energy technologies as a matter of general principle. I believe that modern plants are capable of meeting the required safety standards. The question here is whether waste-to-energy technologies are fatally flawed in Sharpness because of local conditions. Incineration is not the only waste to energy technology. However, I do not find evidence that harm is likely to be caused due to the local ambient air quality levels or the prevailing character of this site.
- 4.26.8 Sharpness is a working port and no harmful effects of current industrial and waste practices are evident in the estuary, either from Sharpness, or from other working facilities nearby that are cited by objectors. The same applies to the wildlife site within the port. While I recognise that the debate about emissions from incinerators is ongoing, for the purposes of the GWLP it is not clear from the evidence presented that waste to energy should be precluded on the grounds of ecological harm. There will need to be careful and thorough scrutiny of the details of any specific proposals that come forward for approval but I am confident that it will be possible to make the necessary judgement on the consideration of an EIA. An EIA should include detailed information on background air quality levels, waste management plant emissions and likely ecological impacts.

- 4.26.9 Except for landfill, which is not a proposed option for this site, no other waste management option is objected to on ecological grounds. The Site Profile would be more complete if it drew attention to the need for compliance with the Conservation (Natural Habitats, & c.) Regulations, 1994 (SI 1994 No. 2716).

#### Local Residents

- 4.26.10 Sharpness Docks is a working port, with a long history of noise, smells, dust, fumes and traffic generation. It continues to be allocated for employment in the emerging Stroud Local Plan (CD25). This allocation will generate further activity and traffic. I do not consider that any of the waste management options listed in Schedule One or Schedule Two, other than landfill, or any of the potential impacts, would represent a departure from the well established industrial character of this location. On a number of occasions I experienced the noise, smells, dust, smoke and stack emissions from ships, plant, machinery, buildings and materials in the port. Local facilities include waste management and cement and fertiliser handling. I do not believe that it is a fair presumption that the physical effects of any waste management facility would have a detrimental impact on the quality of life for local residents. Indeed, it is by no means inconceivable that a well-designed facility (such as the Plasmega building) could have the potential to enhance the quality of the Docks environment, which is in need of regeneration. I do not suggest that because pollution has been experienced in the past that measures should not be sought to ameliorate impacts for new development in the future. The Plan seeks environmental improvement as an objective. Residential impacts will require careful assessment at the planning application stage and being limited to acceptable levels. Anaerobic digestion and composting will need particular care if they are to be implemented.
- 4.26.11 My comments on waste to energy facilities under ecology apply equally to residential impact. It is imperative that any planning and licensing applications demonstrate that the process would prevent harm to human health either through airborne contact, water pollution or through the food chain. The EIA should establish this as would the Environment Agency before a permit was issued. Use of waterborne and rail transport would reduce road traffic.

#### Public Perception

- 4.26.12 Much of the concern expressed about proposals for incineration at Sharpness is based on the public perception of harm. While this is a relevant planning consideration I feel it should be soundly based or have likely land-use effects if it is to carry any weight. My conclusions are based on the balance of cogent evidence.
- 4.26.13 The sheer volume of objections to incineration, including a campaign by FEG precipitating a large block of uniform objections, seems to have caused the WPA to withdraw this site from Schedule One. However, the public's perception of harm is a common feature of debate about waste management proposals generally, and especially about incineration. This is perhaps not surprising, when waste plants have caused serious pollution in the past and the emissions from such plants are potentially very harmful.
- 4.26.14 I firmly believe that all sites should be treated in the same way unless local conditions justify a difference. However, I find no reason for the Sharpness site being treated differently from other sites in the Plan. There may be a perception of harm by some but I believe that perception is likely to be unfounded for any new plant. I also firmly feel that this fear is outweighed as a material consideration by the benefits that a wide range of waste facilities at this location would bring to the wider population, many of whom have not objected to the Plan. I emphatically reject as unjust, the notion that unpopular facilities should be located where there are fewer people or objectors and this plays no part in my reasoning. Giving way to unfounded objections could also prejudice achievement of the BPEO.

## Tourism & Recreation

- 4.26.15 A number of objectors have questioned the effect of a waste management facility on the tourist economy of the area and on recreation facilities. Much of the concern is based on the visual impact of a waste facility and the cumulative impact of emissions from an incinerator on the particular ecological features attracting visitors to this part of the Severn Estuary. As I conclude above, I do not believe that the estuary's ecology would suffer. I also do not believe that walkers would be adversely affected by an appropriately designed and managed facility in this working port complex.
- 4.26.16 The implications of transporting waste by canal on recreational boat users have also been a key area of concern. There is a marina and boat club by the Old Docks. However, during the Inquiry it was conceded that it is common and appropriate for leisure and commercial uses to operate in tandem on the canal, including occasional opening of overbridges. There is forecast to be one waste barge passing in each direction daily. There may be working at the canal side. Taking account of my earlier conclusions and my marine experience, I remain of the view that a waste management facility in this working port would not have a materially negative impact on recreation facilities or on the tourist economy of the area. Indeed, for some people, such a facility may provide a further point of interest.

## Regeneration

- 4.26.17 Sharpness Docks is designated in the emerging Stroud Local Plan for regeneration. Present employment uses will be protected and new allocations made under policies E1 and E3 of that plan. There are buildings and structures that need refurbishment and there are spaces for new construction. The rail system into the port is in small-scale use but old sidings and track ways lie derelict. The canal connects to Gloucester but is not in commercial use. The emerging Stroud Local Plan seeks to encourage development that can use waterborne freight.
- 4.26.18 Waste uses can be categorised as industrial within Class B2 when they are encompassed by its definition and, given good design, can be compatible with industrial and port development of the sort found at Sharpness. The Council's witness, Alan Cave, acknowledged that Plasmega is an acceptable waste development, re-using incinerator ash, because it is enclosed within a building and has little environmental impact. I believe the same can be true of incinerators and other proposed waste management options. Waste facilities would not necessarily have a negative effect on regeneration or prejudice the emerging Stroud Local Plan. Rather, I believe the investment that waste facilities would bring could greatly enhance the port as a whole and particularly the water, rail and road infrastructure. This would benefit all users of the port. It therefore follows that if an incinerator (or any other waste management facility) is well designed, contained and effectively regulated, it would encourage regeneration rather than obstruct it. Cory Environmental Ltd already manages waste using waterborne transport in the River Thames.
- 4.26.19 Because there is disagreement about unemployment levels, and the evidence is unclear, the levels have not been a material factor in my reasoning.

## Visual Impact

- 4.26.20 Sharpness is in a prominent position in the estuary landscape and the estuary has many viewpoints where the public can appreciate the attractiveness of the area. However, the high quality of much of the landscape must be balanced by the need for working facilities that need to use the estuary and its associated road, rail and canal infrastructure. The port has a long history and forms a compact and isolated block of working facilities. It seems to me to be important that the visual character of the port area remains compact and coherent and does not sprawl sporadically into the countryside.
- 4.26.21 Design will be a very important feature in securing appropriate development. However, there are substantial buildings already in the port complex, and particularly the tall silo building behind the mound to the west. Some distance to the south of the port the mass of



the Berkeley Power Station can be seen. There is an interspersing of industrialised development in the landscape. I therefore find no objection in principle to a waste management facility, even though that may include a substantial building with a stack in the port complex, subject to appropriate siting and other design details.

- 4.26.22 Three areas are proposed for the waste facilities in the Deposit Version of the Plan. The areas are designated A, B and C from north to south. Area B is sub-divided into B1 and B2, B2 being site RD23.
- 4.26.23 Area A covers an area allocated for employment in the emerging Stroud Local Plan south of the canal, docks and old rail track overbridge, an area designated as part of the Sharpness – Gloucester Canal and Docks Conservation Area, and an open area of grassland proposed to be part of an Area of High Quality Landscape in the emerging Stroud Local Plan (Table 8.1). This open and sloping grass land is contained between the disused railtrack that used to cross the canal and estuary, the canal, and the Docks Conservation Area. It has canal frontage.
- 4.26.24 The proposed changes to the Stroud Local Plan (June 2001) and the Plan itself, at paragraph 8.7.16, acknowledge that some overlap exists between built development and this landscape designation. However, I can see some conflict in this and the GWLP requirements. This estuarine landscape area is very extensive as shown on the Proposals Map and would still be taken into account even if the GWLP area for site 6 were to be coterminous with it. As it is the landscape area is drawn tightly around the northern (and southern) part of the present port complex.
- 4.26.25 I feel that, if investment is going to be made in bringing water and rail infrastructure back into productive use, and also to improve the roads, then enough land with the right characteristics needs to be made available for the facilities that will finance these initiatives. The port complex is not large and some parts of Areas A and B are more prominent in the landscape than others and more distant from wharfs and the remnants of rail track. Given the range of facilities that may be appropriate to a strategic site then some flexibility is needed to achieve the best environmental and transportation solution. To my mind that means including all of Area A even though it would be an expansion of the port complex beyond its present boundaries. This, now open, area is at least physically contained by the historic infrastructure development of the old railway embankment, the canal and the port. To leave the open parts of Area A out would probably leave too little of it to be viable.
- 4.26.26 Bearing in mind that BPEO needs to be satisfied, it would be appropriate for the Site Profile to include the proviso that the green field area should not be encroached upon without cogent justification and that any facility will require careful design and siting to ensure compatibility with the estuarine landscape and the Sharpness Old Dock Conservation Area.
- 4.26.27 The Conservation Area element of Area A used to be occupied by a gas or chemical works and probably some rail track. This is helpfully shown in CRY/BWW/Doc/4. This construction has been demolished and the site now contains a derelict shed and rough grass in very poor condition at my site visit. The land today does not seem to contribute to the Conservation Area in any positive way. It is by the new port rather than by the Old Dock and it does not seem to reflect the historic origins that prompted its conservation designation (CRY/BWW/Doc/16.1). Bearing in mind the intention of Cory Environmental and British Waterways to use this land as part of the port complex and to use the canal and rail facilities as they were many years ago, it seems very appropriate to include it in Area A. This also seems consistent with Stroud District Council's intentions when designating the Conservation Area as explained in CRY/BWW/DOC/16.
- 4.26.28 The southern part of Area A is designated as employment land in the emerging Stroud Local Plan so industrial development is acceptable in principle.
- 4.26.29 Area B wraps around the Plasmega building and is designated as employment land in the emerging Stroud Local Plan. The whole area forms a mound. The western part comprises open fields down to grass. The northern area used to be the "Pleasure Grounds" occupied

by the Sea Cadets of TS "Vindicatrix" which shows signs of old buildings, roads and other construction. Although the "Pleasure Grounds" are excluded from the employment areas in the emerging Stroud Local Plan, there is a woodland area above the Old Dock to the north west which screens this higher land from the river.

- 4.26.30 The southern and eastern parts of Area B, equating to B2 on illustrative plans or RDGWLP RD23, comprise part fields and part waste ground with signs of an old railway passing through it. B2 is near the tall silo. Area B is set back off the dockside and on the opposite side of the port from the operational railway lines. It is also above the buildings beside the wharves so a substantial and tall building could present a greater visual impact on this site than on the other 2 sites, depending on its precise location. A low building would seem to be able to be accommodated sympathetically on Area B, depending again on details, in the same way as a building in employment use.
- 4.26.31 **Area C** lies beside the dock entrance and is open and largely unused land. It is designated as employment land in the emerging Stroud Local Plan. A waste building would be prominent but, again, not necessarily more so than a building in employment use other than waste. In the wider landscape there is the tall silo to the north and the very large Howard Tenens warehouse or factory development close to the south.
- 4.26.32 My overall conclusion on visual impact is therefore of no objection provided details are sensitively drafted. This is on the basis that the waste development is the BPEO in this location, and it is safeguarded as a required land-use in this compact and important port complex. FEG concedes that it has taken the worst case but I am confident that, on all sites proposed at Sharpness Docks, there is the potential to achieve a standard of design which respects the surrounding open landscape and enhances the visual appearance of the Docks area itself, even for a substantial waste facility. I feel that the 5 year review of the Plan should try to reduce the 3 areas of the site to one so that the land is not unnecessarily safeguarded for waste development.

#### Implications on Netheridge

- 4.26.33 Netheridge (site 13) is as essential component in the canal development and would need to become a Schedule One site on the basis that it would handle over 50,000 tonnes of waste per annum. I consider its suitability at section 4.38 of my report.

#### Need

- 4.26.34 In justifying the deletion of Site 6 from the Plan, the WPA submits that there is no need for the allocation given that sufficient sites have been identified to meet Schedule One requirements (paragraph 4.17 WPA 15). However, the WPA also says that it is appropriate to allocate more sites in the Plan than are needed because this gives sufficient flexibility to achieve the BPEO for each potential use against each potential location. I agree with this excess of potential capacity as it is also prudent to cope with unreliable predictions of arisings and growth rates and to help facilitate the Waste Strategy by reducing pressure on land values.
- 4.26.35 Given the obvious potential of Sharpness Docks to provide a range of facilities (including the possibility of waste to energy and/or as a regional facility), it seems to me that the WPA's approach this site is contradictory. In my judgement, the deletion of Site 6 represents a limitation of the flexibility of the WPA to attain the BPEO for Schedule One sites, some of which (eg Sudmeadow and Wingmoor Farm) have very significant shortcomings.
- 4.26.36 Some objectors are concerned that the allocation of the site under Schedule One might provide a presumption for its development, however I am confident that the provisions of the Plan (paragraph 4.13 & Policy 4), including the requirement to demonstrate that the site is the BPEO (under policy 1), will provide a sufficiently rigorous assessment of any site specific proposals that may come forward. Furthermore I would be concerned that if the allocation of Sharpness is rejected in the Plan, its obvious potential may be lost. It would

not be safeguarded by Policy 7. Furthermore, Policy 4 clearly places Schedule 1 sites above others and puts a substantial burden on applicants of excluded sites by virtue of the site selection procedure and consideration during the Plan process, although I recommend that this be amended (section 5.12 of my report).

### Sustainability

- 4.26.37 I address application of the Proximity Principle to Sharpness in section 2.11 of my report. In summary, proximity is only one aspect of sustainability and, where rail and water transport is available, as at Sharpness, these infrastructure benefits may overcome proximity disadvantages. Trains and barges are capable of carrying much greater quantities of freight per journey than road vehicles. They are quieter overall and avoid adding to road congestion. These transport modes, identified in PPG 10 paragraph A14, and their potential for connection to sources of major arisings, are in my view a key feature of Sharpness as a long-term location for waste facilities. The merits of Sharpness' infrastructure that are unique to the County are acknowledged by Mr Drew MP.
- 4.26.38 Cory Environmental Ltd and British Waterways see early feasibility of connection to Gloucester via the Gloucester & Sharpness Canal to Netheridge. They also foresee the possibility of connection by re-opening the canal to Stroud and by crossing the estuary to Lydney. Clearly other navigable parts of the estuary could be served too, given appropriate facilities. Although connections other than via Netheridge are speculative at this stage, I nevertheless feel that they cannot be discounted and, to be realised, they require some initiative which the GWLP can, and should, give. Moreover, these major infrastructure improvements may never be undertaken unless major development takes place to finance them. Such improvements are sought by the strategies in the Local Transport Plan (CD17).
- 4.26.39 FEG criticises water transport as having less benefits than advocates claim based upon the Belgian Study (FEG/P/1.1); the need for road transport from the points of arising; and the need for return trips for incinerator residues. If Sudmeadow closes in, say, 12 years time, an alternative facility will need to be found and the Highways Agency and others have not assessed Netheridge on the basis of a throughput in excess of 50,000 tonnes per annum.
- 4.26.40 The Belgian Study is acknowledged as showing less advantage for water transport than earlier studies but the Belgian Study does not take noise effects into account and congestion costs posed conceptual difficulties for the authors. These are significant factors. Nevertheless, the study still shows a clear balance of advantage for water transport over road, so I do not consider that it negates the advantages of canal use for the purposes of this Plan. The BPEO will need to be established for a detailed scheme with an EIA addressing transport from various arisings to the points of final disposal. The Netheridge facility will form part of such an assessment as will dealing with arisings in Cheltenham, Tewksbury Stroud and the Forest of Dean.
- 4.26.41 It is also clear to me that the proposals for the development of waste management facilities at Sharpness have significant advantages in terms of the potential to make use of the rail network for the transportation of waste. The use of the rail network may be a longer term option than road or water transport as more work needs to be done, including land acquisition, to provide linking facilities. However, recent discussions seem to show good promise (CRY/BWW/Doc/17). Sites 1 and 2 (Wingmoor Farm), 10 (Railway Triangle, Gloucester) and 11 (Myers Road, Gloucester) all have potential local rail links. In the future, other rail links near arisings may become apparent but longer distances may be needed for economy of use. I therefore consider the presence of the railway at Sharpness to be a significant asset to sustainable waste facilities, adding to the waterway potential. Furthermore, it accords with the Local Transport Plan Objectives EC1 and EC3 and the emerging Stroud Local Plan paragraph 9.11.5.

### BPEO

- 4.26.42 Doubt is cast by some on the BPEO of the Sharpness sites. At this stage in the planning process, the assessment of the Best Practicable Environmental Option for the relevant waste

streams has to be undertaken at somewhat crude level because the information required is not available in sufficient detail. Nevertheless, I have needed to make a broad assessment of BPEO in order to determine the potential of this and other sites by virtue of their location, character or other attributes. To achieve BPEO, the best sites need to be identified and selected in the GWLP and then safeguarded.

- 4.26.43 I have come to the view that, on a broad assessment, there is no obvious reason why this site should be excluded from Schedule 1. Moreover, it seems to me to have conspicuously good long-term potential because of its ability to use rail and waterway infrastructure connections to sources of major arisings and its location within a working port complex. Mr Drew MP conceded that the site is unique in the County and has benefits because of its infrastructure. It does not suffer from Green Belt constraints like Wingmoor Farm and it is excluded from the Severn estuary flood plain unlike Sudmeadow, Gloucester. Sudmeadow has visual constraints too. Waste facilities at Sharpness would seem to have no worse impact due to emissions than would be the case for other sites although environmental designations differ. All sites in the Plan have people, flora and fauna nearby. Sharpness has reasonable road connection and road improvements likely to be needed by the Stroud Local Plan seem feasible in the absence of contrary evidence.
- 4.26.44 Given the evidence before me, the Sharpness site areas have sufficient merits and insufficient deficiencies to preclude the possibility of achieving the BPEO for some waste streams in the Plan period. However, water or rail infrastructure are crucial to this. There is also a need to devise a method of capturing and using the energy from a waste to energy plant if that management method is to be employed.

#### Regional Self Sufficiency

- 4.26.45 Many objections to the site concerned issues of whether Sharpness is a suitable location for a regional waste facility. This assessment awaits the deliberations of the Regional Technical Advisory Body for the South West which intends to publish information on regional waste facilities soon.
- 4.26.46 Needless to say, the fact that Gloucester (Sudmeadow) is already processing between 25,000 and 35,000 tonnes of waste per year transported by road from Bristol, and given the good water access; dock facilities; rail opportunities; and the potential for the provision of a mix of facilities, I have no doubt that the Sharpness site could provide a regional facility if desired. Mr Drew MP foresees Bristol, South Wales and South Gloucestershire as potential arisings. Subject to details on energy saving, Sharpness would seem to have better potential as a regional or strategic facility, using rail and water transport, than as a local facility using road. Therefore, I feel it would be premature to exclude the possibility of providing a regional facility at Sharpness pending guidance from the Regional Technical Advisory Body. Sharpness site areas therefore merit safeguarding in accordance with Policy 7 of GWLP and as advised by PPG 10 paragraph 33.

#### Other Matters Raised

- 4.26.47 I have responded to the following objections and comments elsewhere in my report or in the GWLP:
- (i) Waste collection, recovery and recycling (P1.1.5 to P1.1.7 and RDGWLP paragraph 2.13);
  - (ii) Environmental standards (4.7.1 to 4.7.11).
- 4.26.48 The risk of nuisance from vermin seems to be a function of the design of the facility. I would expect such risks to be minimised in any proposed facility to the degree that nuisance is unlikely to be caused.
- 4.26.49 Safety is an issue that will be considered in any application for a permit or planning permission once details are known. I have no cogent evidence to demonstrate that safety

would be materially prejudiced by a waste facility at Sharpness because of the presence of the fertiliser plant or because of road conditions for example.

- 4.26.50 **Devaluation of property**, if it occurs, is not a material planning consideration. Likewise for **taxation**.

### Overall Conclusions

- 4.26.51 In the light of the conclusions above, I consider the Sharpness site areas to hold significant potential as a strategic facility for the management of waste and accord with the Structure Plan as modified by the Waste Strategy 2000 subject to use of water or rail infrastructure. The benefits in waste terms will be to the wider community of the County, and perhaps beyond, many of whom have not objected to the Plan and the Sharpness proposal. There would also be local benefits in regeneration and supporting infrastructure. I do not believe that fears of harm would be realised if schemes are well designed, managed and regulated in accordance with the precautionary principle. There is no justification for treating Sharpness any differently to other locations in the County. Thus, I have no hesitation in concluding that the Sharpness sites should be reinstated to Schedule 1 of the Plan.

### RECOMMENDATIONS

- 4.26.52 Reinstatement Site 6 Sharpness Docks in Schedule 1 with the following waste management options: Waste to Energy Recovery; Materials Recovery Facility; Inert Recovery and Recycling; Metals Recycling; Household Waste Recycling; Anaerobic Digestion, Waste Transfer Station, Composting.
- 4.26.53 Reinstatement Inset Map 6 and Site Profile for Sharpness revising the type and extent of all environmental designations as necessary and designating the 3 allocated areas A, B and C from north to south for ease of identification and reference.
- 4.26.54 Add to the Site Profile under Site Specific Criteria for Development:
- “The green field area A should not be encroached upon without cogent justification in relation to areas B and C. Any waste facility will require careful design and siting to ensure compatibility with the estuarine landscape and the Sharpness Old Dock Conservation Area.”
- “The Conservation (Natural Habitats, & c.) Regulations, 1994 (SI 1994 No. 2716) must be complied with.”
- 4.26.55 Reinstatement Sharpness Docks, Sharpness under Policy 4 Schedule 1.
- 4.26.56 At the 5 year review of the Plan reconsider the need for all 3 site areas to be allocated and safeguarded.

### 4.27 Schedule Two

#### Comments

| Comments No. | Status (See Key) | Name                            |
|--------------|------------------|---------------------------------|
| 62040/6      | DO               | Forest of Dean District Council |
| 61998/3      | DO/C             | British Waterways               |
| 62043/4      | DO/W             | Gloucester City Council         |
| 89808/10     | DO               | Robert Hitchins Ltd             |
| 89808/8      | DO               | Robert Hitchins Ltd             |
| 89364/4      | DO               | Duncliffe P E                   |
| 88905/1      | DO               | Reeves C                        |
| 65984/1      | DO/W             | Lydney Land Resources           |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

- (i) Too many sites close together
- (ii) Omit reference to the City Council's aspirations
- (iii) Schedule 2 is unnecessary
- (iv) ~~Site 14 should read 'Reclaimed canal land Netheridge' and not 'Monk Meadow Dale.'~~
- (v) Site 13 is not Monk Meadow Dock. *(amended in RDGWLP)*
- (vi) ~~Reflect the potential of Site 17a by including Household Waste Recycling, Waste Transfer Station or Composting options~~
- (vii) ~~Site 16 has planning permission to operate as a scrapyards, inert recovery and recycling and waste transfer station~~
- (viii) Proposed sites will be potentially noisy and need strict regulation.
- (ix) Wind borne pollution is likely from this range of sites.
- (x) Adverse effect on ability to attract employment
- (xi) Phoenix House is an inappropriate facility in the countryside and Green Belt.

## Inspector's Reasoning and Conclusions

- 4.27.1 I agree with the objection that there are too many sites clustered in, and around, Gloucester. The distribution is unbalanced and compares unfavourably with Cheltenham which seems to have few facilities for its scale of arisings. Outlying areas do not seem to be well served. I comment at sections 4.14 and 4.15 of my report about site selection and recommend that the Plan is progressed to achieve a better disposition of sites and facilities. However, at this early stage in the Waste Plan's evolution, and as a survey and some consideration of sites has taken place, I believe it right to retain the sites selected unless any are obviously unsuitable. In the future the list of sites will be better justified and refined as more sites are identified but eliminating potential sites prematurely could prejudice sustainability and the County's ability to manage its waste.
- 4.27.2 Gloucester City Council's aspirations are material and I have given them weight appropriate to their nature in the same way as other authorities, organisations and individuals.
- 4.27.3 As explained at RDGWLP paragraph 4.12 Schedule 2 lists sites appropriate for smaller facilities to serve a more local catchment of arisings. Identifying these sites provides greater certainty than a criteria-based approach. The schedule is more logical, clearer and more comprehensive than an adaptation of Policy 5.
- 4.27.4 Proximity of waste development to housing and other land uses is bound to require care in assessing risk of noise and other forms of pollution and traffic generation and the imposition of controls to ensure that an acceptable environmental standard is achieved. This will take place when applications for planning permission and permits are made. My appraisal simply looks at the broad position to rule out obviously inappropriate sites where those sites are subject to objection.
- 4.27.5 The Lydney sites 16 and 17 are considered at sections 4.42 to 4.45 and the Phoenix House site 8 at section 4.33 of my report.

## RECOMMENDATION

- 4.27.6 No change to the Plan resulting from these objections other than those made in section 4.14 and other sections of my report mentioned above.

## 4.28 RD Schedule Two

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 63115/2      | RDO              | Hucclecote Parish Council              |
| 89837/2      | RDO              | Holmes E Mr                            |
| 88538/4      | RDO              | Westbury Homes Ltd                     |
| 88537/4      | RDO              | Bovis Homes Ltd                        |
| 89716/2      | RDO              | Church D Mrs                           |
| 88641/2      | RDO              | Price A Mrs                            |
| 88640/2      | RDO              | Price M Master                         |
| 88639/2      | RDO              | Price Hannah Miss                      |
| 88638/2      | RDO              | Price B J Mr                           |
| 98059/2      | RDO              | Varnam B Mrs                           |
| 98038/2      | RDO              | Varnam A Mr                            |
| 87715/3      | RDO              | Arlington Property Developments Ltd    |
| 61953/2      | RDO              | North Cerney Parish Council            |
| 62041/4      | RDO              | Stroud District Council                |
| 62041/3      | RDO/C            | Stroud District Council                |
| 88797/7      | RDO              | Federal Mogul Corporation              |
| 62637/8      | RDO/W            | Cory Environmental (Glos) Ltd          |
| 62637/7      | RDO              | Cory Environmental (Glos) Ltd          |
| 98640/7      | RDO              | Trustees of W. J Liddington (Deceased) |
| 89985/2      | RDO              | Farthing J M                           |
| 62040/1      | RDO              | Forest of Dean District Council        |
| 87290/2      | RDO              | Price K E                              |
| 87287/2      | RDO              | Price Margaret Christina               |
| 88195/2      | RDO              | Price J E Mr                           |
| 89719/2      | RDO              | Varnam R Mr                            |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) Pollution will be caused by facilities in these locations.
- (ii) Amenity of local residents will suffer from these facilities.
- (iii) There is conflict with the economic strategies of the County and the broader economic, social and environmental objectives of the planning system
- (iv) The AONB will be harmed.
- (v) Non-vehicular modes of transport will not be encouraged and sympathetic integration of uses achieved.
- (vi) The schedule has excessive capacity.
- ~~(vii) Site 13 – Add MRF and Waste Transfer Station to the schedule in relation to Netheridge.~~
- (viii) Objection to certain potential uses of Sites 15,16 and 17.
- (ix) Impact of site 17 on roads
- (x) Amend schedule to show revisions to Lydney
- (xi) Site 19 - exacerbation of traffic through Calmsden and effect on nearby residents
- (xii) RD20 – type of facility unclear
- (xiii) Site 23 – the use of this site should be restricted.

### Inspector's Reasoning and Conclusions

- 4.28.1 I have dealt with objections concerning **individual sites** in the sections of my report on the sites concerned. I have also considered whether it is inevitable that the individual sites will

be found to be unacceptable because of pollution, harm to amenity or damage to other environmental interests.

4.28.2 For the reasons set out in Chapters 1 to 3 of the Plan, as commented upon in my report and subject to my recommendations, I believe this Plan to properly address waste planning in the County. It is essential that waste is dealt with in a sustainable way and this Plan seeks to achieve the balance between economic, social and environmental objectives. The discipline of BPEO, required for all new waste development, is an integral part of that exercise. Use of more sustainable transport modes is encouraged by Key Objectives 7 and 10 of the Plan at paragraph 2.13. Sympathetic integration of uses is at Key Objectives 3 and 8. The Plan overall has safeguards in its framework of policies that augment the Schedules and site details.

4.28.3 I have commented on excessive capacity at sections 4.14, 4.15 and 4.27 of my report.

4.28.4 Amendments to Schedule 2 will be proposed by the sections of my report dealing with the list of sites and other objections. I agree with the clarifying minor amendments proposed in WPA31.

## RECOMMENDATION

4.28.5 No change to Schedule 2 except as recommended elsewhere in my report.

4.28.6 Amend the Key to the Inset Maps on page 67 of RDGWLP by adding the word "Proposed" before "Area of High Quality Landscape" and "/Watercourses" after "Estuarine".

## 4.29 GDC for Other Facilities

### Comments

| Comments No. | Status (See Key) | Name                            |
|--------------|------------------|---------------------------------|
| 88417/3      | DO               | Gloucestershire Royal NHS Trust |
| 62637/5      | DO/W             | Cory Environmental (Glos) Ltd   |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) ~~The need for flexibility should be recognised in the text.~~
- (ii) Smaller facilities could still have a significant risk of adversely affecting the local environment

### Inspector's Reasoning and Conclusions

4.29.1 The check list for Schedule 2 facilities under the General Development Criteria appear to be comprehensive. Taking all the provisions of the Plan there seem to be adequate safeguards for all waste development from the small to the large scale.

## RECOMMENDATION

4.29.2 No change to the Plan from the objection to this section.



### 4.30 Site RD3 (Gloucester Business Park, Brockworth)

#### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 63115/1      | RDO              | Hucclecote Parish Council              |
| 61849/1      | RDO              | Badgeworth Parish Council              |
| 62044/1      | RDO              | Tewkesbury Borough Council             |
| 87715/5      | RDO              | Arlington Property Developments Ltd    |
| 62041/6      | RDS              | Stroud District Council                |
| 98640/14     | RDO              | Trustees of W. J Liddington (Deceased) |
| 88797/14     | RDO              | Federal Mogul Corporation              |
| 88537/5      | RDO              | Bovis Homes Ltd                        |
| 88538/5      | RDO              | Westbury Homes Ltd                     |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

#### Summary of Objections

- (i) Extra traffic through Badgeworth on the overloaded A46.
- (ii) Pollution would be caused.
- (iii) Conflict with national and local economic, environmental and social objectives.
- (iv) Conflict with Tewksbury Borough and Stroud District Local Plans and Structure Plan.
- (v) Amenity of local residents present and future and setting of Cotswold AONB would be damaged.
- (vi) Facility would prevent sympathetic integration of land uses
- (vii) Reinstate as a strategic waste management site as it conforms to national guidelines.
- (viii) Recent information reinforces the objections.
- (ix) Waste use inconsistent with high quality industrial development being progressed.

#### Inspector's Reasoning and Conclusions

- 4.30.1 After the inquiry session dealing with objections to the allocation of Site RD3, the WPA conceded that the RDGWLP should go further to protect the certainty and amenity of the Business Park. It proposed that, if I felt it appropriate, the site area in RDGWLP should be an area of search with notes or amendments to the effect that only one waste management facility be developed at the site, inert recovery and recycling be deleted, hazardous waste be excluded, and the requirement for waste management facilities to be wholly enclosed in a building (WPA 31a). Schedule 2 allocates the site for all waste management options except for landfill.
- 4.30.2 The Gloucester Business Park is a strategically important and prestigious commercial development. It needs to compete regionally for business and to bring investment into the local area. Its competitors in Birmingham and Bristol have good travel links. APD imposes a comprehensive framework of covenants on its tenants to preserve a high degree of environmental quality according to a Masterplan. It is also a factor in my consideration that a substantial housing development of some 1,900 houses is planned as an urban extension by Stroud District and Tewkesbury Borough Councils on the land adjoining the Business Park to the west and south. These factors raise the main issue of whether the waste management facilities proposed can be satisfactorily integrated with the Business Park and with nearby housing.
- 4.30.3 Because this essentially local waste facility is, or will be, so close to substantial arisings; it is so close to good highway links; and it is well placed relative to other present and proposed waste facilities to serve the eastern sector of Gloucester, I am clear that it is very well located strategically for waste management functions that lend themselves to road transport. I therefore believe it accords with Structure Plan Policy WM2 as a potential secondary facility and would contribute to the Regional Waste Management Strategy

(RPG10 paragraph 9.27). I do not read the Structure Plan policy as limiting secondary facilities to rural locations although this site is on the present rural fringe of Gloucester. The overriding concern is to achieve the most sustainable network possible. This requires a spread of facilities such that travel is minimised overall. However, this is one of many factors to be considered in a BPEO exercise.

- 4.30.4 I agree with objectors that the WPA's site selection exercise has shortcomings (please see section 2.18 of my report). I am only able to deal with those sites proposed in the Plan and as omission sites. However, I accept the value of the type of site comparison exercise carried out in APD/P/1 Appendix 3 and BWY/DOC/1 Appendices 11 & 12. These show Site RD3 to be poor. I do not agree with the weighting given, particularly to compatibility with existing and proposed uses and proximity to sensitive receptors. The analysis is also simplistic because it treats all waste management facilities the same and as a worst case. Mitigation measures and improving technology are not considered. I explain this further below.
- 4.30.5 It is a valid point made by Bovis/Westbury that urban locations should be able to provide an integrated range of facilities on one or more sites, which should be more efficient than a spread of smaller ones. However, achievement of optimum sustainability strikes me as a complicated exercise given the range of existing facilities, the shortcomings of many sites, and the difficulty of making small local sites integrated yet economic. I therefore support the WPA's approach in identifying and safeguarding a range of sites, as advised by PPG10 at Paragraph 33, even if that exceeds the capacity requirements of the Plan. I explain the need for extra sites further at section 4.15 of my report. I see no need to limit Site RD3 to a single waste management option although integration would be preferable within a single facility. APD has a valid point that the Business Park's critical mass should not be compromised. Commitment of a single site/plot to waste management should not do this.
- 4.30.6 Outline planning permission was granted for the Gloucester Business Park in 1992 for a 10 year period for Use Classes B1, B2 and B8. Thirty one ha (77 acres) of the site were restricted by condition 8 for Class B2/B8 only. This requirement was reiterated in clause 6.1 of the associated S106 Agreement. In 2001, the condition imposing the 10 year limit on reserved matters was varied by planning permission 01/7689/0095/FUL dated 19/10/01, extending the period by 10 years. Note 3 states that all conditions attached to the outline planning permission, which I take to include the requirement for Class B2/B8 use in condition 8, continue to apply (APD/P1 Appendix 1). A further S106 Agreement was, at the time of the GWLP inquiry being finalised that deleted clause 6.1 of the earlier S106 Agreement. Tewksbury Borough Council reported that a resolution had been passed to vary the S106 Agreement to permit as great a proportion of Class B1 units as the developer desires. This was in 1998 before the GWLP was published. However, from the documents provided (APD/DOC/2) I do not read the deletion of this clause as amounting to the local planning authority granting planning permission for a variation of condition 8 and therefore negating the requirement in the planning permission for 31 ha Class B2/B8 development on the site. Tewksbury Borough Local Plan identifies the Business Park for Class B1, B2 and B8 uses.
- 4.30.7 Construction of the Business Park is now steadily progressing. Appendix A to APD/DOC/1 shows the housing and Business Park layout on the Masterplan including Business Park plot numbers to which I refer based upon my site visits during the inquiry period. The main access ways have been laid and a good quality of landscaping has been planted and constructed and is becoming established. Several plots in the eastern part of the Park are in operation involving very large, but good quality, buildings. These include car body manufacture by Takao (Plot 6000), St Ivel (Plot 6100), Wincanton Logistics (Plot 8000), and Royal Mail in a smaller plot (Plot 8300). Three newly constructed small units on Plots 8400 and 8500 were unoccupied at my site visit. Further, smaller business units occupy the north western part of the Park. The southern central and western parts of the Park, earmarked for Class B1 development on APD's plan, are vacant as are several Plots earmarked for Class B2/B8 to the east and south east part of the site. These B2/B8 plots are Plot 6110 by the Du Pont works, Plot 6200 between St Ivel and Wincanton Logistics, and Plots 8100, 8200 and 8350 in the southeast corner by Wincanton Logistics and Royal Mail.

- 4.30.8 APD wishes to promote the Business Park through Class B1 uses as a mixed use centre or “village”. It regards the Business Park development as being effectively in Use Class B1, as constructed to date, even for the units on Class B2/B8 sites, but I do not agree. There are noisy areas around, and from within, the Takao and St Ivel buildings including reversing sirens. There is noise of heavy vehicles manoeuvring and of crates being handled in outside areas. Steam rises from the St Ivel building. This is no criticism. It is a natural consequence of Class B2/B8 uses and is outside Class B1. Golf Club Road, beside the Du Pont works, is clearly industrial in character. So is Hurricane Road as I saw it. The land is relatively high quality industrial and business land but not so high that waste uses can be ruled out altogether. I see these industrial parts of the Business Park as conforming to PPG10 paragraph A51a.
- 4.30.9 The qualitative character of this waste site, like Site 9 (Dowty), lends itself only to waste management options that can conform to similar high environmental standards. I believe it would be bad planning to encourage APD to produce a prestige industrial and business development of high environmental quality, including for Class B2/B8 uses, and then impose a requirement on the partially implemented project that undermines APD's effort and investment. APD's concern is understandable based upon many waste management practices and methods but I feel that the local waste dimension needs to be taken more fully into account in planning the Business Park. This also means that waste operators need to achieve and maintain best practice to be acceptable here and these practices will have costs. The WPA accepts that standards need to improve and past attitudes need to change. It cites the Tilzely facility in Birmingham as an example of good waste management practice.
- 4.30.10 The WPA has rightly ruled out inert recovery and recycling because of its “dirty” nature and its need for outside operational space for waste handling. The objectionable problems are illustrated in the appeal decision T/APP/M1900/A/99/1028880/P5. For the same reasons I would exclude waste transfer based upon the process description in RDGWLP Chapter 4. Other processes will need to be excluded unless they can be enclosed and the traffic servicing them can comply with high standards. The Site Profile needs to state this. However, given improving technology and handling methods I do not believe the evidence demonstrates that it is not possible for a range of well designed, sited, constructed and regulated waste management facilities to integrate satisfactorily on this site at some stage during the Plan period. Waste uses have been found to be within Class B2. Special and hazardous wastes would fall to be given particular scrutiny under RDGWLP Policy 15. It is interesting to observe how Takao (Plot 6000) has organised its building and industrial operations to a relatively good level of environmental impact. In the interests of sustainability I see no reason to exclude the possibility of more than one waste facility on the site.
- 4.30.11 An important ingredient in achieving sympathetic integration of any waste management facility with other development is the access arrangements. A Civic Amenity Site would attract smaller vehicles but it would be undesirable to have residential and waste traffic comprising heavy lorries sharing the same access. The same applies to industrial traffic servicing the present units although this segregation is unlikely to be put into effect given the earmarking of the northern area of the Business Park for housing. If waste traffic used the easternmost access to the site (Golf Club Lane) and the waste facility were to be on the eastern or southeastern part of the Business Park (Plots 6110, 6200, 8100, 8200 and 8350) this would achieve the best, and I believe an acceptable, result for most enclosed waste management options although Plot 8350 is rather small. These arrangements are considerations when details for housing and further development of the Business Park fall to be considered. The present access layout does not rule out a Schedule 2 site given its potential range of traffic generation which some put at 100 lorry movements a day. The same applies to the impact on the A46 and local roads. A Transport Assessment may be required in accordance with Policy 39.
- 4.30.12 Because the Business Park layout and its accesses are well advanced, and it would be essential to segregate waste from prestige business and residential traffic for the traffic

generated by a strategic waste facility, I feel that restoration of the suggested strategic option is inappropriate for the Business Park.

- 4.30.13 Although a landscape barrier is mentioned in the housing Masterplan, which would provide reasonable amenity protection for less intrusive waste uses, such as an enclosed Civic Amenity Site, other uses would be better located north of Plots 3200 and 7400 and east of plots 2000 and 2100 if they could not be accommodated elsewhere. Class B1 uses would then provide an effective buffer for residential occupiers. It may be necessary to assess any potential conflict between waste management proposals and “hi-tech” uses.
- 4.30.14 Given the present planning permission for the Business Park, the presence of the Du Pont plant and other development, the housing proposals, and the absence of design details of a proposal, I see no visual grounds to support an objection to this waste site. Sensitive design will be important given the character of the Business Park and the sensitivity of its surroundings but I believe that a waste project could achieve this.
- 4.30.15 Pollutants would be controlled by conditions on a process permit. My comments on waste to energy technology and process regulation are at sections 4.7 and 4.9 of my report. This site has a major benefit with potential energy users so close. I do not find evidence to support prejudice to drainage or proposals to open up Wotton Brook.
- 4.30.16 The concerns about blight because of apprehension of pollution by prospective local residents and companies is, I believe, overstated and, for an appropriate scheme, not well founded. I accept that there is some prejudice, coloured for some by “the Sandhurst incident”, but what is important in my view is to get the right type of waste scheme on this site that is subject to appropriate requirements for siting, design and management through planning permission and a process permit coupled with good public presentation of the facts. GWLP Policy 36 would apply. It would be better if the sites to the south east of the Business Park were used but the release of sites is in the hands of APD. Waste facilities of the right type are badly needed close to arisings and are employers. I see no conflict with the Structure Plan policies E2 and E6. An appropriate waste facility in this location would also provide more integrated and better planned community infrastructure than otherwise.
- 4.30.17 APD is strongly opposed to a waste use on this site and raises the question of whether any land will be made available for this purpose. While, short of compulsory purchase, landowners have freedom to dispose of their land as they see fit, the local planning authority, when considering any development requiring planning permission or approval of reserved matters on the designated waste site, will need to take account of the GWLP allocation and policy 7 safeguarding sites to the extent that the grant of planning permission for the Business Park is not prejudiced. Future choices by the landowner in changed circumstances cannot be predicted. Thus Site RD3 does not seem to me to be ruled out on grounds of non-availability from a land-use planning viewpoint.
- 4.30.18 I do not agree that the Plan should apply a criteria-based approach. It is Government policy to achieve site specific waste plans in order to achieve more certainty and sustainability through selecting, allocating and safeguarding appropriate sites as outlined in PPG12 paragraph 3.12 and PPG10 paragraphs 29f and 33.
- 4.30.19 My overall conclusion is that Site 3 has the potential to provide a very valuable waste management facility to meet the strategy described at paragraph 9.27 of RPG10 and its Policy RP5 and Structure Plan policy WM2. But, to accord with current waste policy, that facility needs to conform to the general standards of environmental quality of the Business Park. It will be a prestigious waste facility. Costs, and the need to wait for better waste practices, could limit the value of this site to the Plan in the short term but could become feasible in the longer term. This seems consistent with the duration of APD's aspirations.
- 4.30.20 Because the development is progressing, APD opposes the allocation, and some reconsideration and reorganisation of the Park and adjacent housing may be necessary once the GWLP is adopted, I believe a larger site area should be maintained in this particular case to give flexibility. This causes some uncertainty, which is very undesirable, but I see it

as being necessary to enable the safeguarding provisions of policy 7 to be effective with discretion being exercised by the WPA and Tewksbury Borough Council on how it is applied as the waste management network, the Business Park and housing schemes evolve. An area of search may not achieve this. For the reasons explained above, the preferred area should be drawn around those plots which could accommodate a secondary waste facility at some stage during the Plan period. This includes plots 6110, 6200, 8100, 8200, 8350, 3100, 7200, 7300. I also feel it should include plots 6100 and 8000 should a change of use ever be sought for those buildings. The preferred area could, and should, be reduced if a smaller area could be agreed with APD and Tewksbury Borough Council. I foresee only one plot of reasonable size being required on the Business Park.

## RECOMMENDATIONS

**4.30.21 Retain Site RD3 in the Plan but drawn on the Inset Map around Plots 8000, 8100, 8200, 8350, 6110, 6100, 6200, 7200, 7300, 3100.**

**4.30.22 Delete the following waste management options from Schedule 2 site RD3:**

Inert recovery and recycling  
Waste transfer station

**4.30.23 Add Plot 6110 to the preferred site on the Inset Map for Site RD3.**

**4.30.24 Add to the Site Profile for Site RD3 under Site Specific Criteria for Development:**

Because of the relatively high environmental quality of the site area and surrounding land uses and the strategic importance of the Business Park it will be necessary for operational areas to be fully enclosed and for vehicles servicing the facility to conform to appropriate environmental standards. The type and volume of traffic generated and access arrangements will be scrutinised for compatibility with other land uses.

## 4.31 Site 7 (Moreton in Marsh)

### Comments

*For a list of objectors and supporters see Appendix 1: Figure 7*

### Summary of Objections

- (i) Traffic generation, noise, dust and odours would be harmful
- (ii) Sewage smell is bad enough
- (iii) Access for Thames Water must be preserved
- (iv) Vermin and flies would be attracted and litter caused by the facility
- (v) Expansion of the high quality Cotswold Business Village would be deterred
- (vi) There are better locations for a waste facility
- (vii) Contrary to Local Plan policy
- (viii) Timescale is unclear and the preparedness of the site owner to release the site is in doubt
- (ix) The site is unlikely to satisfy a BPEO analysis
- (x) Proximity to cemetery is insensitive
- (xi) Question the site selection criteria used

### Inspector's Reasoning and Conclusions

- 4.31.1** The Revised Deposit version of the Plan retained the original Site 7 but added 3 areas of search, including the Playing Field Services Depot off Evenlode Road. The site has been selected in the Plan for the single purpose of a household waste recycling centre (or Civic Amenity Site) to bulk up household non-putrescible waste arising locally for onward transportation. The glossary to RDGWLP defines a Civic Amenity Site as a site operated

by the County Council in accordance with the Environmental Protection Act 1990 to which the public may deliver non-business waste and at which a range of materials (eg metals, paper, glass, engine oil) is recovered for recycling. The facility does not therefore lend itself to accepting waste from the businesses on the Cotswold Business Park without some flexibility and arrangement for bulking up commercial waste.

- 4.31.2 The strategic location of the site seems very good on the face of the evidence before me. The plan of licensed sites at RDGWLP Appendix 5 shows the lack of Civic Amenity Sites in this area of the County although it is a material shortcoming of the Plan that it does not show facilities along the fringes of neighbouring counties so that the proximity principle can be sensibly applied. The nearest Civic Amenity Site in the County appears to be some distance away at Fosse Cross north of Cirencester and there seems to be a lack of facilities in the large rural area in this part of the County. The WPA, Cotswold District Council and others accept that there is a need for a facility of the sort proposed in the Moreton in Marsh area. The WPA and District Council feel that waste facilities in this location need improvement if possible to increase the efficiency of waste operations generally. However, Shipton on Stour, across the County boundary, is said by Cotswolds Seeds Ltd to provide better potential than Moreton in Marsh but it is some 16 km away. Unfortunately, as I have said elsewhere in my report (see sections 2.18 and 3.10), the RDGWLP lacks cogent and comprehensible analysis of site selection.
- 4.31.3 Because of the lack of facilities in this part of the County and Moreton in Marsh's ability to serve its own community and the local rural catchment I feel that a facility here is justified for the Plan. I am reinforced in this view by the fact that more housing is proposed for Moreton in Marsh in the emerging local plan, the agreement of the County and District authorities with a local waste management site, and the difficulty of finding suitable sites in this part of the County. However, any planning application should consider any appropriate sites in neighbouring counties to establish BPEO.
- 4.31.4 Turning to the preferred site occupied by business units of the Cotswold Business Village, the adopted Cotswold District Local Plan (1999) (CD21) Area 2 Policy 2.9 sets out guidance for employment development. The site chosen for the waste facility is identical to site G in the District Local Plan which proposes development within use class B1, provided the use does not generate significant numbers of trips by employees, and, so long as there is no likelihood of harm to residential amenities or to existing businesses, and no unacceptable increase in the volume of traffic, use class B2. It is envisaged that conditions attached to any planning permission would regulate impact to ensure compatibility with the qualitative business environment sought. Because the site is ostensibly available for class B2 uses, the WPA regards it as being appropriate for this waste facility because such facilities can be located and managed in a sensitive way.
- 4.31.5 Waste would be brought into the site by householders in cars, perhaps with trailers, and other vehicles. The wastes would be deposited in skips or containers and then bulked including by compaction. Lorries would then remove the bulked waste.
- 4.31.6 The facility would not be of greater capacity than 50,000 tonnes/year by virtue of Schedule 2 of the waste local plan but a capacity in the order of 3,000 tonnes/year is more likely in the WPA's view. This is based upon experience of the facility at Fosse Cross. The WPA foresees the facility being sited in the south east corner of the site towards the sewage treatment works and away from the cemetery and housing
- 4.31.7 It is common ground that the facility could generate noise, although this should be mitigated by enclosing activity within a building. Objectors point to the risk of litter and rubbish that could become an eyesore and the relatively high traffic generation from such a facility. The character of such a use would degrade and be incompatible with the quality of the business park. A food business is one of those on the site at present. The ability to put the waste facility effectively under cover is also questioned.
- 4.31.8 Three alternative sites are proposed in the Revised Deposit Plan as areas of search. The Plan does not preclude other sites being proposed and being granted planning permission if

they are suitable. The proposed site east of Mosedale living quarters for the Fire College is being actively considered for some 50 houses in the review of the District Local Plan. The present housing is in fairly close proximity to the site and access to it is through a residential area. This site therefore has material disadvantages.

- 4.31.9 The two proposed sites on opposite sides of Todenham Road to the north are both considered by the WPA, Cotswold District Council and NMB/Porsche to be particularly suitable for the proposed facility. They are near enough to the urban area to be convenient and minimise travel and they have reasonable access. They are sufficiently far from housing to ensure that any impact on amenity could be regulated to an acceptable level. The land is already developed to a degree on both sites. Furthermore, these sites have potential scope for waste transfer, inert recovery and recycling and perhaps other waste facilities that seem to be needed. I support these extra facilities but they have not been publicly proposed for comment.
- 4.31.10 In the light of the merits of these northern sites the WPA now regards the Cotswold Business Park as being no more than an area of search. Given the quality of the Business Park as it now stands, I see no case to identify and safeguard the Cotswold Business Park for the Waste Local Plan, even as an area of search. I agree with the WPA that businesses cannot simply reject having waste facilities near them, especially when Class B2 use is allocated, however, the District Local Plan does not really appear to permit Class B2 as such in this case. The District Plan seems to effectively align Class B2 with Class B1 for this site. I therefore find incompatibility between the allocated use of this site and the waste use proposed.
- 4.31.11 I am in no doubt that the 2 northern sites adjoining Todenham Road are most appropriate for the household waste recycling facility. I also believe these sites are capable of sustaining more extensive waste facilities subject to careful design, layout, location and landscaping of any facility to ensure that the residents of the nearest houses to east and west do not suffer undue effects. In view of proposals for further housing, it is not clear which of the 2 sites is preferable. In the circumstances I feel that both sites merit safeguarding pending review of the Plan.
- 4.31.12 Because the area of search east of Mosedale has the disadvantages noted above, it does not seem to be an appropriate candidate to be retained in the Plan in the light of the merits of the 2 northern sites.

## RECOMMENDATIONS

- 4.31.13 Show licensed waste facilities along the fringes of neighbouring counties that could reasonably be used by residents and businesses in Gloucestershire in Appendix 5 of, or a supplement to, the Plan.
- 4.31.14 Delete the Cotswold Business Park from the Inset Map for RD7 as a preferred site.
- 4.31.15 Delete the area of search east of Mosedale from the Inset Map for RD7.
- 4.31.16 Amend the Inset Map for RD7 to show the 2 northern areas adjoining Todenham Road as "preferred sites" instead of areas of search and delete "areas of search \_ \_ \_ \_ \_" from the annotation box.
- 4.31.17 Amend the details in the Site Profile to apply solely to the 2 northern areas.

## 4.32 Site RD7 (Moreton in Marsh)

### Comments

| Comments No. | Status (See Key) | Name |
|--------------|------------------|------|
|--------------|------------------|------|

|         |     |                           |
|---------|-----|---------------------------|
| 62042/1 | RDS | Cotswold District Council |
|---------|-----|---------------------------|

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

#### 4.33 Site 8 (Phoenix House, Elmstone Hardwicke)

##### Comments

| Comments No. | Status (See Key) | Name                                 |
|--------------|------------------|--------------------------------------|
| 62044/2      | DO               | Tewkesbury Borough Council           |
| 88655/1      | DO               | Tallon Shaun                         |
| 61985/1      | DLO              | Elmstone Hardwicke Parish Council    |
| 89750/1      | DLO              | Neale A R Mr & Mrs                   |
| 62604/10     | DO               | Gloucestershire Health Authority NHS |
| 89808/9      | DO               | Robert Hitchins Ltd                  |
| 61605/1      | DO               | Boddington Parish Council            |
| 88678/2      | DO               | Tufnell Town & Country Planning      |
| 63118/1      | DO               | Uckington Parish Council             |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

##### Summary of Objections

- (i) Increased use of the animal crematorium is unacceptable.
- (ii) Question the licensing of the facility for incineration.
- (iii) Facility is too close to houses, the pub and a guesthouse.
- (iv) Access is poor and dangerous.
- (v) The range of lawful uses of the site is not acknowledged.
- (vi) The facility would be better positioned at Wingmoor Farm.
- (vii) The site is unsuitable for the use of 'other' waste management facilities.

##### Inspector's Reasoning and Conclusions

- 4.33.1 The site is envisaged by RDGWLP for its presently permitted use of incineration, with waste to energy recovery, plus options within a 50,000 tonne per year ceiling for the site overall of materials recovery, anaerobic digestion, waste transfer and composting. This seems adequate acknowledgement of the site's **lawful uses**. Schedule 2 requires correction to show waste to energy as a potential option rather than occurring at present as no energy has been recovered from the incineration process to date. The Site Profile also requires amendment to correctly reflect the proximity of dwellings, the "Gloucester Old Spot" public house and a guest house (Stanboro Cottage).
- 4.33.2 This is a relatively small site which is already well developed in open countryside but it is outside the **Green Belt**. It is well located because of its juxtaposition with Cheltenham, Gloucester and smaller local settlements, and its accessibility to arisings via the A38, A4019 and M5, albeit limited at junction 10 of the latter. The scope envisaged by the WPA is for potential changes of use within the present site and contained within the present buildings. Encroachment beyond the site into open countryside is not planned. The site is reported to have had a history of problems associated with incineration in support of the BSE cull of cattle. It is now under different management and the authorisations have lapsed.
- 4.33.3 I agree with objectors that the **proximity of people** to the site makes them vulnerable to impacts from the facility if it is not regulated effectively. The reports of past problems suggests that regulation has not been adequate in the past. Tewksbury Borough Council



regards the 400m distance from housing applied to permitted agricultural development as being relevant to waste development by analogy but I do not agree. I believe that the requisite standards can be achieved by application of new technology and containment of processes. Such standards are being achieved elsewhere and it would be wrong to exclude this site simply because of its history of failures of management and regulation. I see no reason why in the future this facility should not be able to comply with conditions on any permit for its presently permitted use, or on any permit and planning permission for new development to ensure that neighbours are not adversely affected by noise, fumes or any other effect. As PPG23 paragraph 1.34 makes clear, from a planning viewpoint I must rely upon the pollution control regime being properly applied and enforced. There are people living near all waste sites in the Plan and it would be wrong to apply different standards to different locations without good reason.

- 4.33.4 The **road safety and access** objections are overstated in my view. I looked critically at the short length of road between the site and the A4019 and the A4019 in each direction, driving the route on a number of occasions. I found the sight lines and space in the road to be adequate even when the road was busy with relatively fast flowing traffic. This is a modest facility attracting say 20 x 10 tonne lorries per day on average taking a 5 day week (2.5 vehicles/5 return trips per hour for an 8 hour day). It is already a permitted facility. The accident statistics (WPA22b) do not support access to this site being dangerous. I therefore find no objection on this ground.
- 4.33.5 The availability of the **Wingmoor Farm** sites is a factor when considering whether new development at Site 8 is BPEO, and is therefore justified. Residues may need to be disposed of to landfill. However, because Site 8 has a permanent building and, as I have observed at sections 4.20, 4.21 and 4.46 of my report, Wingmoor Farm sites have a problem for long term built development because of their Green Belt status, Site 8 has merits that may outweigh the advantages of relying upon Wingmoor Farm. There are also facilities at other sites to be considered such as Moreton Valence, Netheridge and Sudmeadow.
- 4.33.6 Accessibility is also a factor bearing in mind too that Site 8 is essentially a local and not strategic site. The location and waste management options seem consistent in principle with the network of secondary facilities envisaged by Structure Plan policy WM2. Nevertheless, any application would need to be assessed when its details were known. In the meanwhile, I do not feel that the presence of Wingmoor Farm should cause this site to be excluded from the Plan despite its apparently limited scope for the future.
- 4.33.7 The facility at Phoenix House appears not to have been adapted for energy recovery. The Site Profile needs to clarify this.

## RECOMMENDATIONS

- 4.33.8 **Retain Site 8 in the Plan.**
- 4.33.9 **Amend Schedule 2 Site 8 to show waste to energy as a potential option.**
- 4.33.10 **Amend the Site Profile Existing Operations by inserting “adaptation for” after “without”.**
- 4.33.11 **Amend the Site Profile Constraints – Proximity to Dwellings to read “A number of dwellings, a public house and a guest house lie within 500m of the site.”**

## 4.34 Site 9 (Land rear of Dowty, Staverton)

### Comments

| Comments No. | Status (See Key) | Name                       |
|--------------|------------------|----------------------------|
| 62044/3      | DO               | Tewkesbury Borough Council |

|         |     |                                      |
|---------|-----|--------------------------------------|
| 88596/1 | DO  | Dowty Sports & Social Society        |
| 88642/1 | DO  | Messier-Dowty Limited                |
| 61606/1 | DO  | Down Hatherley Parish Council        |
| 62012/5 | DO  | Highways Agency                      |
| 89843/1 | RDO | Dowty Group Plc                      |
| 88596/1 | RDO | Dowty Sports & Social Society        |
| 88642/1 | RDO | Messier-Dowty Limited                |
| 89843/1 | DO  | Dowty Group Plc                      |
| 88643/1 | DO  | Ashville Commercial Developments Ltd |
| 88644/1 | DO  | Alfred McAlpine Developments Ltd     |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

### Initial Deposit

- (i) Delete in view of the proposals for housing development
- (ii) Would blight a site of strategic importance for employment
- (iii) Waste incompatible with Class B uses permitted and high standard of amenity sought
- (iv) Site needed for essential aerospace business expansion
- (v) Pollution by dirt, grit and smells incompatible with adjacent uses
- (vi) Sports and social club requires environmental quality
- (vii) Access inappropriate for waste traffic
- (viii) Would be impact on adjoining Green Belt
- (ix) There is a high water table, mists form and Hatherley Brook could be polluted
- (x) Vermin would be attracted by the facility

### Revised Deposit

- (i) Contribution for M5 improvements is inappropriate.
- (ii) An airport crash scenario must be considered.

## Inspector's Reasoning and Conclusions

- 4.34.1 The site forms part of a compact island of industrial and business development mainly associated with the aeronautics industry surrounded by open Green Belt land. The site is mostly open grassland on the northern fringe of the development next to a golf course and sports club.
- 4.34.2 A number of key points persuade me that this site should be retained in the GWLP as a site allocated for a local waste management facility. Firstly, the facility being considered would be relatively small scale being in schedule 2 and would require only a modest proportion of the site. Secondly, the site is strategically well located for domestic and commercial arisings from Gloucester and Cheltenham and in relation to other sites in the Plan as required by Structure Plan policy WM2. Thirdly, the site has been allocated for industrial use for many years and is allocated for Class B2/B8 industrial uses in the Deposit Draft Tewksbury Borough Local Plan (1998). It adjoins a compact group of industrial uses. Some waste uses are capable of displaying the same, or very similar, character to this use class. Fourthly, the site seems to be served by a reasonable road network for this urban area, bearing in mind that the present access will need to be improved substantially if the site is to be developed for any use and it is a minor facility being potentially proposed. I note the 7.5 tonne restriction on Down Hatherley Lane, occasional congestion on the B4063, and the disagreement about the extent of access works that might be required for different uses (DTY/W/4 & 5).
- 4.34.3 On the other hand, I support objections concerning the vulnerability of the local environment to degradation from dust, dirt, grit, fumes and smells and from excessive noise

and heavy traffic. I have in mind the interests of the aerospace industry and the range of well laid out recreational facilities close by in the Green Belt. Reasonable use of the public footpath should also be preserved in any new development in accordance with policy 40.

- 4.34.4 The character of the locality suggests to me that, if this site is to be used for waste management facilities, the facilities need to be of good design and they, and the vehicles servicing them, should conform to high environmental standards. Facilities will need to be enclosed and the presence of water and the atmospheric conditions may need to be allowed for. I do not believe that inert recovery and recycling and waste transfer would be acceptable here because, by their nature as described in Chapter 4 of RDGWLP, they would be noisy and dusty in an open area and would generate very disturbing traffic such as skip lorries. Heavy or dirty industrial type uses would clearly be incompatible with the adjoining recreation area and, seemingly, aerospace industry. These options should therefore be excluded from the Plan. My colleague describes the objectionable effects in his decision T/APP/M1900/A/99/1028880/P5 (DTY/W/3 Enclosure 1). Other types of facility would need to be well regulated to achieve and maintain satisfactory environmental standards but the evidence does not suggest that such standards are not achievable with ever improving technology and handling methods. In these circumstances I do not believe that new or existing employment uses on the site would be blighted. I have commented on waste to energy points at sections 4.7 and 4.9 of my report. There are potential energy clients close by.
- 4.34.5 If major highway improvements are needed other than immediate access arrangements they will be identified during the course of a planning application. RDGWLP Policy 39 covers the need for transport assessment. I see no need to alter the notes on this in the Site Profile. Any assessment will need to demonstrate the effects of development upon the M5 before a contribution for the junction can be considered appropriate.
- 4.34.6 The site is allocated for housing in the Revised Deposit Tewksbury Borough Local Plan (2001) to meet the regional housing requirement set out in RPG10. That Local Plan is at an earlier stage than the GWLP. The proposed allocation of 120 houses is also subject to objection, although the extent and detail of objection beyond that contained within DTY/W/1 Appendix 7 is not entirely clear. The Public Local Inquiry into the Borough Plan was due to open in March 2002. It seems to me that if the housing allocation is upheld to displace the industrial use allocation then the proximity of housing further constrains the environmental standards that need to be met by any waste use. Only one access to the site seems feasible. To my mind it would be inappropriate for heavy waste traffic and residential uses to share this access.
- 4.34.7 If housing is constructed on the site a Civic Amenity Site, which could be enclosed and serviced mainly by light vehicles, is the only potentially feasible waste management option I foresee being acceptable here. But, this would be a very valuable and appropriate secondary facility in this location. The site is well spaced in the urban area between Wingmoor Farm to the north east, the Cheltenham Borough Council Depot at Swindon Road, Cheltenham (see paragraph 4.1.18 of my report) and Sudmeadow to the south west. This is apparent from the Plan at Chapter 8 of DTY/W/1 – Alternative Site Appraisal. All Scheduled sites will not be appropriate for use as Civic Amenity Sites as other facilities are needed and it is not always appropriate for facilities to be integrated. These are factors not fully accounted for in this appraisal. Appendix 5 of RDGWLP reveals a marked lack of Civic Amenity Sites locally and throughout the County. Site 9 could thus greatly help to achieve a more sustainable waste network by serving its locality.
- 4.34.8 The buffer treatment in space, bunds and landscaping that could be necessary to adequately protect residents from the industrial type effects of the proposed range of waste uses would not be an efficient use of land. I therefore conclude on this issue that only a Civic Amenity Site could be an acceptable option given careful design. Thus, if the housing allocation of this site is upheld in the Borough Local Plan, then all waste management options other than a Civic Amenity Site, should be removed from Schedule 2 of the GWLP.

- 4.34.9 As I have commented above, the comparative appraisal of Site 9 with other sites shows it to have sufficient merit for it not to be excluded from the Plan. It is not an ideal site, as the appraisals in DTY/W/1 chapter 8 and DTY/W/2 Tables suggest although, as my various site appraisals show, I do not agree with the weighting given in all cases in these appraisals. It is the case that all sites in RDGWLP have some disadvantages. A BPEO exercise would be necessary for any planning application which I foresee including comparing the proposed facility with the existing facilities such as the MRF's at sites 9, 13 and 16 of RDGWLP (Appendix 5). As I have also commented elsewhere in my report (section 4.15), having an excess of potential sites over requirement is prudent in my view, provided a reasonable balance is struck, and will help to achieve a sustainable network of facilities. I have also commented upon the lack of comparative appraisal in RDGWLP (section 2.18 of my report). On present evidence I do not believe the number, or concentration, of Schedule 2 sites and waste management options is such that Site 9 should be excluded at this stage.
- 4.34.10 Whether the land will come forward or not is, short of compulsory purchase, a matter for landowners. Interests in land change over time. I do not feel that the present inclinations of landowners should dictate the planning status of the land drawn up in the public interest in the relevant Local Plans. I note the advice in PPG12 paragraph 6.27 on realism in terms of availability of the land. I regard this land as available because it is vacant and because the owner seems to wish to develop it in the foreseeable future to extend present works in accordance with the 1995 Masterplan and to construct housing. He will need to develop it with regard to its planning status. I have concluded that a waste element should be considered to have potential whether the land is developed for housing or industry. I believe it would be contrary to the public interest for recent transactions of land to negate waste use in favour of housing use.
- 4.34.11 I do not see how the proximity of the airport tells against waste management facilities in principle, especially as policy 43 of the Plan will apply to any development proposals.

## RECOMMENDATIONS

- 4.34.12 Delete from Schedule 2 for Site 9 potential waste management options for inert recovery and recycling and waste transfer station.
- 4.34.13 If the housing allocation is upheld in the Tewksbury Borough Local Plan delete all waste management options from Schedule 2 of the GWLP except for Household Waste Recycling Centre.
- 4.34.14 Amend the Site Profile as follows:

Site Specific Criteria for Development, add the following bullet points:

“The route of public footpath EDH 10/A”

“The site has a good environmental standard that will require enclosed facilities and a high standard of control of noise, dust and other potential pollutants.”

“The site access requires substantial improvement. A Transport Assessment will be required.”

## 4.35 Site 10 (Railway Triangle, Gloucester)

### Comments

| Comments No. | Status (See Key) | Name                            |
|--------------|------------------|---------------------------------|
| 88417/4      | DO               | Gloucestershire Royal NHS Trust |
| 88658/7      | DO               | Hannaford John                  |
| 62043/11     | DO               | Gloucester City Council         |

|         |    |                              |
|---------|----|------------------------------|
| 62500/1 | DO | Barton Residents Association |
| 86843/1 | DO | Kendall C A Mrs              |
| 87286/1 | DO | Tandy Group                  |
| 88753/1 | DO | Tracey P Veal & Mr M G Ms    |
| 62008/1 | DO | Railtrack Property Plc.      |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

- (i) Narrow access and busy traffic locally.
- (ii) Close to housing, offices and hospital which need protection.
- (iii) Railway facilities would be displaced prejudicing future improvements.
- (iv) Landfill capacities will dictate continuing transport problems.
- (v) This site will encourage waste importation.
- (vi) Incineration should take place where electricity is generated.
- (vii) It is doubtful that incinerator standards will be maintained.
- (viii) Rats, seagulls and toxic gases will result.
- (ix) EfW sites and scrap yards are inappropriate for this densely populated location and are not comparable to Class B1, B2 or B8 uses.
- (x) Access should be taken from Metz Way.
- (xi) Anaerobic digestion, waste to energy recovery and waste transfer are inappropriate here.
- (xii) Employment and mixed commercial use would be prejudiced.

## Inspector's Reasoning and Conclusions

- 4.35.1 It seems to me that this is an excellent site because it is well within the City and very close to substantial commercial and residential arisings; it is a good size and comprises derelict land; it has ready access to rail infrastructure; via Metz Way it would have good access to the City's arterial road system; it is in a fairly busy noise environment beside industrial development and the site is allocated for employment uses in the Gloucester City Local Plan.
- 4.35.2 The proximity of housing off Myers Road (Barton Residents) and Armscroft, the presence of a day nursery and schools and the Gloucester Royal Hospital are very important factors to be considered, but their location does not suggest to me that the site is inappropriate. What is important is that any waste facilities are designed to a good standard and well regulated so that they are sympathetic to their surroundings. I believe adequate protection of amenity and control of pollution and vermin to be possible. Containment of operations within a building seems of crucial importance to control dust, smells, noise and other effects. Thus higher environmental standards would be achieved by new development than are exhibited by some sites that are understandably mentioned by objectors. The Site Profile could be expanded to mention the housing and hospital but precautions in development to protect neighbours would be no different for this site than others in the Plan. Site-specific criteria are therefore unnecessary for this purpose. All sites have people living near them.
- 4.35.3 I comment on the acceptability of EFW plant at sections 4.7 and 4.9 of my report. I am aware of hospital and other incinerators in other parts of the country that seem to perform satisfactorily in urban areas although I am keenly aware of the reported bad experience with the Gloucester hospital incinerator which is bound to have tainted local views. I refer to this in section 4.23 of my report (Sudmeadow). I believe it would be wrong and unjustified to rule out EFW as a potential future option for this site.
- 4.35.4 In coming to this conclusion I note the City Council's concern that a tall stack would mar views of the cathedral and that waste facilities would degrade a prestige site at the gateway to the City. The City has a similar criticism of Sudmeadow with which I have sympathy (section 4.24 of my report). However, I do not have the same sympathy for this site. The townscape factor is certainly relevant here, and should be added to the Site Profile, but,

because of the character of the railway, the commercial and industrial development already in place, the site's size, shape and low lying nature, and the scope for good design of any facility, I do not see why waste facilities should not be capable of construction and operation appropriate to the environment in this location.

- 4.35.5 The Plan states that access via Metz Way is a pre-requisite for waste facilities and I agree that this is essential. The present road access is very poor and unacceptable for waste use. There may need to be some transportation to landfill if residues cannot be recovered for other uses. If export of residues is not by rail it would be by road but this would be so for any facility not co-located with landfill/landraise. Gloucester's landfill, Sudmeadow, is subject to objection and has a life expectancy of 2013 or earlier. Wingmoor Farm does not seem to have such good access to Gloucester's waste arisings as Site 10 and is limited by Green Belt constraints. Thus a detailed assessment is necessary of any proposed scheme to achieve the BPEO and the most sustainable option for the future but Site 10 has very good potential in my opinion. An EFW plant is likely to generate its power at the site and has potential energy users very close by.
- 4.35.6 I do not share Railtrack's lack of confidence in the ability of waste development to satisfactorily exploit this site together with other commercial uses for the reasons I have explained. For waste development to be truly sustainable I believe its co-location with other uses in an urban environment is essential. The evidence does not suggest that future rail potential will be prejudiced. Waste uses are likely to help to support rail infrastructure improvements.

## RECOMMENDATIONS

4.35.7 Retain Site 10 in the Plan.

4.35.8 Add to the Site Profile for Site 10:

Under "Proximity to Dwellings" delete the comment and replace it with "There are areas of housing to the north and northeast of the site and Gloucester Royal Hospital to the northwest."

Under Site Specific Criteria for Development add: "The site is located in a "gateway" to the City and is prominent to public view. Waste development will need to ensure that key views of the cathedral are not prejudiced and to be of a standard that will not discourage other employment uses on the site."

## 4.36 Site 11 (Transfer Station, Myers Road, Gloucester)

### Comments

| Comments No. | Status (See Key) | Name                              |
|--------------|------------------|-----------------------------------|
| 88417/5      | DO               | Gloucestershire Royal NHS Trust   |
| 86842/1      | DO               | Eldridge Sylvia                   |
| 86844/1      | DO               | Perrett C G Mr                    |
| 87896/1      | DO               | Blackstock Jacqueline             |
| 88658/8      | DO               | Hannaford John                    |
| 62043/12     | DO               | Gloucester City Council           |
| 88753/2      | DO               | Tracey P Veal & Mr M G Ms         |
| 88677/2      | DO               | Allstone Sands Gravels Aggregates |
| 88677/1      | DS               | Allstone Sands Gravels Aggregates |
| 88663/1      | DO               | Allstone Sand & Gravels           |
| 88338/1      | DO               | Price John R Mr                   |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

- (i) Site merits Schedule 1 status.
- (ii) Opportunities of the site should be more clearly recognised.
- (iii) Harmful to nearby residential areas and discouragement to tourists.
- (iv) Would spoil view of the cathedral.
- (v) Present uses are bad enough and this would be worse, especially more heavy lorries, poor road surface, pollution from noise and other emissions and vermin.
- (vi) Rail integration would be problematic.
- (vii) The handling of waste should be undertaken away from populated areas.

## Inspector's Reasoning and Conclusions

- 4.36.1 As my site visits revealed, access to this site is particularly poor. The route from Myers Road is narrow, poorly surfaced and prone to obstruction. The road network from the urban area generally does not seem to lend itself to generation of fleets of heavy lorries. The rail crossing already causes congestion on Horton Road which is a busy urban route. The urban access route compares unfavourably for the future with Site 10 via Metz Way and Netheridge and Sumeadow (site 14) via the new by-pass (when constructed) for example.
- 4.36.2 The site also has housing of Swallow Park and Armscroft Park at each end and its size and shape limits its scope to provide ameliorative measures to protect amenity or to place additional facilities. For these reasons I consider the site to be clearly unsuitable for expansion and diversification as a strategic facility even though the site is licensed for an annual throughput of 75,000 tonnes per year now and is undertaking some activities exempt from waste management licensing. These shortcomings will also tell against the site in its comparison with other sites during BPEO and sustainability assessments for waste development proposals to serve the City, notwithstanding its advantages of a central urban location and its potential for rail connection. Because connection to Metz Way together with Site 10 would involve crossing the railway, access improvement does not appear feasible at present.
- 4.36.3 Amenity impacts of waste operations are reduced by a large covered waste transfer and recycling area. The site seems to be well managed, with qualified management staff, but any new or expanded facilities would require careful assessment and regulation to ensure that residential amenity is protected. Some objectors (eg Gloucester City Council and Mr Price) refer to breaches of conditions and what they report is understandably annoying. Other City sites in the Plan do not place waste facilities so close to housing. Selected sites normally have scope for a buffer of some sort with residential development. Residents near this site are very vulnerable to reversing sirens and other external noise which, even if experienced now, should not be made worse and should be improved if at all possible in accordance with the Plan's Key Objectives (RDGWLP paragraph 2.13).
- 4.36.4 Given the industrial development now in place locally and the low lying character of the site I do not find townscape or spoiling of views of the cathedral to be cogent objections. The site adjoins a Landscape Conservation Area which I would expect to influence a good standard of design. My comments on Site 10 (section 4.35 of my report) apply on this issue.
- 4.36.5 If rail connection were to be problematic as the City Council suggests then this would rob the site of a potential point of advantage. However, even with rail use, lorry transportation may be required at some stage on a relatively poor route.
- 4.36.6 The reasons for seeking sites close to waste arisings is explained in RDGWLP at paragraphs 2.15 to 2.27 and the way sites were selected at paragraphs 4.8 to 4.13 (as recommended to be amended in my report).
- 4.36.7 My overall assessment of the objections to Site 11 is therefore that some are well founded. The site does not seem to be a strong candidate for expansion even though it is currently

functioning as a valuable and diverse waste management site and may be well managed. Management could change and the site could well be causing legitimate objections now even though it is working below capacity. The site obviously has a continuing part to play in waste management for the City as a permitted facility but it seems unlikely to compare favourably with other City sites as a sustainable location for new waste facilities in the future. The GWLP is looking for a short list of sites with good potential from which to choose the best.

- 4.36.8 The appeal decision T/APP/U1620/A/98/294844/P7 dated 9 October 1998 was based upon a comparison of the waste use proposed with the warehouse use permitted previously on that site (the "fall back" position). These permissions derived from a lawful development certificate based upon historic long user, all before a waste plan was drawn up. The site reached its current stage of evolution before the present high degree of emphasis on sustainability in land-use planning. I clearly distinguish development permitted on the basis of historic user in one location from sites identified in the GWLP for new uses in the future selected from the whole County. It does not seem appropriate to place Site 11 in the Plan as a site selected as having potential for new waste facilities in the long term. As the WPA says, exclusion from Schedules 1 and 2 does not preclude an application for new facilities if the objections and limitations can be overcome and the site can be demonstrated to be sustainable. The site is already included in RDGWLP as site no. 165 in Appendix 5 (existing licensed waste management facilities).

## RECOMMENDATION

- 4.36.9 Delete Site 11 from Schedule 2 of the Plan and do not include it as a Schedule 1 site.

## 4.37 Site 12 (Horton Road Depot, Gloucester)

### Comments

| Comments No. | Status (See Key) | Name                                     |
|--------------|------------------|--|
| 88417/1      | DO               | Gloucestershire Royal NHS Trust          |
| 62043/13     | DO/W             | Gloucester City Council                  |
| 89830/1      | DO               | Gloucestershire Community Health Council |
| 88664/1      | DO               | Horton Road Depot Objectors Consortium   |
| 86411/1      | DO               | Feasey Mr & Mrs                          |
| 86844/2      | DO               | Perrett C G Mr                           |
| 87286/2      | DO               | Tandy Group                              |
| 62500/2      | DO               | Barton Residents Association             |
| 62043/7      | RDS              | Gloucester City Council                  |
| 88905/1      | RDS              | Reeves C                                 |
| 88658/9      | DO               | Hannaford John                           |
| 62008/2      | DS               | Railtrack Property Plc.                  |
| 88753/3      | DO               | Tracey P Veal & Mr M G Ms                |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

Objections relating to :

- (i) Proximity to residential development, offices and hospital
- (ii) Upgrading of public services
- (iii) Capacity of landfill
- (iv) Importation
- (v) Use for electricity
- (vi) Incineration standards



- (vii) Rats and seagulls
- (viii) Environmental awareness
- (ix) People will be driven away from the area (62500/1)
- (x) Storage to the rear of Great Western Road
- ~~(xi) Gateway to city & need for high quality development~~
- (xii) Site should simply record the existence of existing basic waste transfer facilities
- (xiii) Increased traffic
- (xiv) Noise pollution

## Inspector's Reasoning and Conclusions

- 4.37.1 The site was withdrawn from RDGWLP. There is only support and no objection to this change.

## RECOMMENDATION

- 4.37.2 No recommendation is necessary.

## 4.38 Site 13 (Reclaimed Land, Netheridge)

### Comments

| Comments No. | Status (See Key) | Name                           |
|--------------|------------------|--------------------------------|
| 62016/5      | DO               | Gloucestershire Wildlife Trust |
| 62043/8      | RDS              | Gloucester City Council        |
| 86845/2      | DO               | Compton J N Mrs                |
| 62637/10     | RDO              | Cory Environmental (Glos) Ltd  |
| 61998/6      | RDO              | British Waterways              |
| 88658/10     | DO               | Hannaford John                 |
| 62043/14     | DS               | Gloucester City Council        |
| 62043/5      | DO/W             | Gloucester City Council        |
| 62569/21     | DO/W             | Environment Agency             |
| 61998/2      | DO               | British Waterways              |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

### Initial Deposit

- (i) The site is unsuitable for a waste transfer station
- (ii) There would be smell, noise of lorries, birds and blow flies.
- ~~(iii) The canal is a source of drinking water which it would contaminate~~
- ~~(iv) Land at Hempsted Lane is not identified for housing~~
- (v) The canal is identified as a Key Wildlife Site

### Revised Deposit

- (i) Object to the deletion of 'strategic facility'
- (ii) Objection to deletion of reference to structure plan policy

## Inspector's Reasoning and Conclusions

- 4.38.1 As I made clear in section 4.26 of my report, on present evidence, the use of the Sharpness and Gloucester Canal is an essential feature of the use of Sharpness Docks as a strategic waste management facility to serve Gloucestershire and I recommend that Site 6 be re-instated in the Plan. Barges would run between Sharpness and Netheridge. No other

locations on this canal have been mentioned as being likely loading points in the near future. Netheridge would therefore serve Site 6 as a bulking up and initial recovery/sorting and waste transfer facility. It has 2 waste management options, namely for household waste recycling and as a waste transfer station. Because the throughput would need to exceed 50,000 tonnes per year, Netheridge would also need to become a strategic facility included in Schedule 1 rather than Schedule 2. If the Sharpness site were not available then another port facility would need to be found, or road transport used, to dispose of those elements of the waste streams that were not recovered or recycled.

- 4.38.2 The site will be alongside the Gloucester South West By-pass due for completion in 2005 (WPA 13b). Reclamation work and re-routing of the canal will be required for the road. In view of the likelihood of continuing congestion on the new by-pass at certain times (see my report paragraph 4.24.14 - Sudmeadow), traffic generation and access appear to require special attention when drafting proposals for a strategic site including householders' waste. Nevertheless, the improved road should enhance the accessibility, and so sustainability, of this site to serve Gloucester and the wider area. With its water transport potential and proximity to the by-pass, Netheridge would seem to have advantages over some other sites in the City.
- 4.38.3 The site is close to industrial and commercial development so impacts from noise, dust, smells, visual and nature conservation impacts should be within acceptable levels given good design of the facilities. Requisite standards of development and process management will be important for the restaurant close by the site and the housing in the locality. However, this seems achievable pending any new evidence which may be brought forward as a result of further advertising this site for inclusion in Schedule 1.
- 4.38.4 I find no objection to the site's inclusion in Schedule 2 as a candidate site to compete with other sites in Gloucester to achieve BPEO. It is also encouraging that this site has the support of the City Council.

## RECOMMENDATIONS

- 4.38.5 Advertise the site's inclusion in Schedule 1 as ancillary to Sharpness Site 6.
- 4.38.6 Subject to overriding objection as a result of advertising, include Netheridge in Schedule 1 and reinstate the deleted text in RDGWLP Site Profile.
- 4.38.7 If Netheridge is not included in Schedule 1, retain it in Schedule 2.
- 4.38.8 Add the following note to Site Specific Criteria for Development in the Site Profile if the site is included in Schedule 1:

**"A Transport Assessment will be needed for the likely sources of waste passing through the facility and the types of road vehicle delivering and collecting them. The impact of traffic on the new by-pass and associated roads should be given particular attention."**

## 4.39 Site 14 (Land adjacent to Sudmeadow, Hempsted, Gloucester)

### Comments

| Comments No. | Status (See Key) | Name                                      |
|--------------|------------------|---|
| 63039/6      | DO               | Vision 21 Waste & Pollution Working Group |
| 86845/3      | DO               | Compton J N Mrs                           |
| 62613/17     | DO               | Hempsted Residents Association            |
| 88658/11     | DO               | Hannaford John                            |
| 62043/15     | DO               | Gloucester City Council                   |
| 62043/6      | DO/W             | Gloucester City Council                   |

62016/3

DO

Gloucestershire Wildlife Trust

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

- (i) There is already smell, noise of lorries, flies, birds and blow flies from existing waste facilities.
- (ii) Sudmeadow Key Wildlife Site is not identified
- ~~(iii) Page 74 : LCA – the land identified does not concur with the industrial commitment~~
- ~~(iv) Page 75 : the site is adjacent to the LCA not within a SPA. It does not adjoin the Severn~~
- (v) Amenity of local residents of nearby properties need protection.
- (vi) The site is inappropriate for EfW use and use as a scrap yard gives rise to concern
- (vii) Avoidance of double handling of waste is fallacious
- (viii) Discharge from ventilation would be at the height of some houses unless a high stack was incorporated.
- (ix) Harmful effects would be caused to Severn flood meadows

## Inspector's Reasoning and Conclusions

- 4.39.1 Many of my comments on the strategic Sudmeadow Site 4 apply to this adjoining site. However, many of the effects of development would be less because Site 14 is identified in the adopted and emerging Gloucester Local Plans for employment uses, expanding the industrial uses now present; it is set back from the river and the Sudmeadow; and the facilities proposed would be of a smaller scale and exclude landfill. Please see section 4.24 of my report. Gloucester City Council foresees industrial (Class B2) uses on this site, subject to appropriate safeguards, but wishes to preserve the employment potential of the land. This is logical, but waste facilities generate employment too. Closer proximity to housing and other uses would need to be allowed for when considering noise, smells and other non-visual aspects of amenity and to ensure that other employers are not deterred. It is a Key Objective of the Plan to preserve or enhance environmental quality (RDGWLP paragraph 2.13).
- 4.39.2 I foresee waste facilities being constructed with similar, or identical, characteristics to Class B2 use. This may include a metals recycling facility or relocating the Civic Amenity Site at some stage if waste use of Site 4 ceases (see recommendations 4.23.7 and 4.24.22 of my report). I do not see why in-vessel composting should be ruled out as a potential option (see paragraph 4.1.21 of my report). I also see no cogent reason why a small energy from waste plant should not remain an option for the reasons explained in section 4.23 of my report. The stack height of any EFW plant will need to be designed appropriately. Any plant must be shown to be BPEO and it must gain a permit for use. The Plan and legislation provide these safeguards. It seems to me that high standards of design and management are crucial to successful development of waste facilities in the future here and elsewhere. Given that proviso, I do not believe that site 14 should be excluded from the Plan, neither should the waste management options be amended except for the addition of composting.
- 4.39.3 I agree with the WPA that consolidation of complementary waste facilities is efficient and more sustainable than spreading them about requiring increased transportation.
- 4.39.4 The Sudmeadow Key Wildlife Site has been identified on RDGWLP and I have commented on it in section 4.23 of my report.

## RECOMMENDATIONS

- 4.39.5 Add a Potential Waste Management Option notation to Schedule 2 of composting for Site 14.

#### 4.40 Site 15 (Forest Vale Industrial Estate, Cinderford)

##### Comments

| Comments No. | Status (See Key) | Name                                    |
|--------------|------------------|---|
| 62040/7      | DO               | Forest of Dean District Council         |
| 92465/4      | DLO              | Forest of Dean Conservative Association |
| 62013/3      | DO/W             | English Nature                          |
| 88827/2      | DO               | Dean J Mr                               |
| 61768/1      | DO               | Friends of the Earth (FoD)              |
| 88827/1      | DO               | Dean J Mr                               |
| 62016/6      | DO               | Gloucestershire Wildlife Trust          |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

##### Summary of Objections

- (i) Planning conditions on surface water drainage must be enforced.
- (ii) The site is too close to housing.
- (iii) Identify and safeguard the Key Wildlife Site and the Reserve at Laymore Quag.
- (iv) There is flood risk on these sites and risk to the aquifer.
- (v) The sites are inappropriate for the proposed uses
- (vi) Harmful impact on the Special Landscape Area and on the forest.
- (vii) Cinderford is not strategically well placed to serve the Forest of Dean.

##### Inspector's Reasoning and Conclusions

- 4.40.1 The preferred locations for waste management facilities within the industrial estate were altered in the Revised Deposit version of the Plan, although some locations remained the same. I have assumed that the unwithdrawn objections therefore remain but I deal with them under Site RD15 in the following section of my report.
- 4.40.2 No-one supports maintaining the areas in DGWLP in preference to those proposed in RDGWLP, including the WPA.

##### RECOMMENDATION

- 4.40.3 The site areas shown in the Deposit Version of the Plan should be considered superseded by those in RD15 of the RDGWLP.

#### 4.41 Site RD15 (Forest Vale Industrial Estate, Cinderford)

##### Comments

| Comments No. | Status (See Key) | Name                            |
|--------------|------------------|---------------------------------|
| 62040/2      | RDO              | Forest of Dean District Council |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

##### Summary of Objections

- (i) The sites are not appropriate for the proposed uses.

##### Inspector's Reasoning and Conclusions

- 4.41.1 As a result of pre-inquiry negotiations the WPA proposes to vary the preferred waste management areas in the industrial estate (WPA 31). Areas B, D and E are omitted. Area F, now occupied by the obsolescent sewage treatment works, is added as an area of search. The Site Profile is amended to require area A to be screened and for waste management operations on all areas to take place within a building. As drafted in RDGWLP, Schedule 2 proposes the options of a materials recovery facility and inert recovery and recycling on these areas. Metals recycling already takes place within the industrial estate.
- 4.41.2 FED points out that paragraph 4.12 of RDGWLP states that the waste management options in the Schedules are only indicative of those that may be appropriate, inferring that other options may well be implemented. The basis for selection of these options is unclear. Although the WPA does not foresee other options, I feel it would be premature and unsound to exclude them. To do so would deny potentially appropriate opportunities to waste operators and flexibility to the WPA to achieve BPEO as circumstances change. I therefore agree with FED that a broad approach to the appropriateness of the areas on the industrial estate should be taken. I thus consider all waste management options except landfill/landraise for Cinderford.
- 4.41.3 Cinderford seems to be a good location for appropriate waste facilities to complement those licensed facilities shown in RDGWLP Appendix 5, although I do not have details of the distribution of arisings (section 3.10 of my report). The WPA reports that the Forest of Dean's waste is currently processed in Gloucester. After reduction of waste, the Plan seeks recovery and recycling of waste as near its point of arising as possible. There seems plenty of scope for Cinderford to play an important role in this.
- 4.41.4 The adopted Forest of Dean Local Plan 1996 promotes employment opportunities and encourages regeneration in Cinderford under policy FE1. Environmental improvement is sought in the Forest Vale Industrial Estate under policy F Cinderford 4. Policy F Cinderford 7 reserves part of the Forest Vale Industrial Estate for Class B1 uses. The Plan reaffirms the estate's allocation overall for a mix of Class B1, B2 and B8 uses. This strategy is carried forward in the emerging local plan (First Deposit) as policies (R)FE.1 and (R)F. Cinderford 1,2 & 5 and other policies.
- 4.41.5 Waste management seems to me to be an employment use within policy FE.3 and should be seen as an integral part of any industrial development allocation in principle at least. This seems to me to reflect the guidance of PPG10. I do not therefore agree with the District Council's contention that waste uses would effectively displace valuable employment uses. What seems to me to be important is to require good environmental standards of waste developments to secure compatibility within industrial estates like Forest Vale and to identify and safeguard appropriate sites for the purpose. On the other hand provision needs to be made in plans for the less attractive industries.
- 4.41.6 As regards impacts, it is a very important consideration that waste operations would be enclosed. Although there are examples of "dirty" uses on the estate, especially by areas A and C, they contrast with the good quality buildings and generally "clean" uses elsewhere. The District Council is concerned about blight from waste management uses that could stifle regeneration initiatives and environmental improvement and I would support that concern if a good standard of environmental quality were not going to be required for new facilities. The Site Profile should make this clear. Please also see section 4.16 of my report (Wilderness Quarry, Mitcheldean).
- 4.41.7 Given an enclosed environment, noise, dust, fumes and smells should be able to be controlled at a reasonable level within the building which should not exceed the effects of neighbouring industrial development and should not degrade the environment of the sports field by Area C. Similar parameters are necessary for external operations and traffic. The waste areas are some distance from housing outside the estate so these effects should not be objectionable for a Civic Amenity Site, MRF, metals recycling and waste to energy plant given careful design and regulation. These areas build on existing waste uses. I comment on objections to waste to energy technologies at sections 4.7 and 4.9 of my report. Any

application for waste to energy plant would need to take account of a possibility of temperature inversion affecting gas emissions. There are energy clients on hand.

- 4.41.8 Inert recovery and recycling and waste transfer as described in RDGWLP Chapter 4 appear to be incompatible with the aspirations of the WPA and the District Council for this location because of their “dirty” nature, their need for outside apron space, and the noise and dust made by the operations and by the vehicles that service them. Anaerobic digestion and in-vessel composting may also be unacceptable here from the point of view of risk of smells. However, Area F enjoys a degree of isolation from the industrial development and housing which could lend itself to these options. Nevertheless, the substantial disadvantage of Area F is that such development would seriously degrade the quality of the Statutory Forest, the Special Landscape Area, the Key Wildlife Site and the proposed recreation use of the Forest fringe Linear Park (under policy (R)F. Cinderford 16 in the emerging local plan) through visual, noise and dust impacts. The sewage treatment plant on Area F is a low key use without visually obtrusive structures as compared with more intensive and obtrusive waste facilities. I find it a key point that Area F is not designated for industrial use in the adopted or emerging District local plans despite Biffa’s reported current use of the site as a maintenance base. I therefore feel that allocation of Area F, and the options of inert recovery and recycling and waste transfer, are not acceptable on Site RD15. Site F may also have the complication of the Crump Meadow Colliery mineworkings below it which could rule out anaerobic digestion and in-vessel composting. The possibility of mineworkings is mentioned in the Site Profile for the area generally.
- 4.41.9 On the other hand the site proposed by the District Council at the Bell Waste Transfer Station among derelict buildings by the A4136 and by its junction with the proposed route for the new access road into the industrial estate (under policy (R) F. Cinderford 14 in the emerging local plan) would seem to be a far better option than Area F for future consideration. It could be better than Areas A and C for waste management options generating less environmentally friendly traffic. Areas A and C could usefully serve better quality waste management options. The Bell Waste Transfer Station was not put forward as an omission site so it is not for me to comment further, except to say that this will need careful planning and early identification and allocation in view of the present mixed use allocation proposed under policy (R)F. Cinderford 5 in the emerging local plan.
- 4.41.10 The possibility of an aquifer, or ecology, being affected by pollution is accepted by the WPA if adequate precautions are not taken. Groundwater plans produced by FED show local vulnerability which could rule out anaerobic digestion and in-vessel composting as described in Chapter 4 of RDGWLP. Policy 34 of RDGWLP is designed to prevent flood risk. However, the provision of buildings, impervious surfaces, operating procedures and drainage requirements can prevent pollution. The Site Profile highlights this requirement and I do not have cogent grounds to suggest that it is likely that waste management options will be unable to take effective precautions as technology improves, or will be granted planning permission or a process permit if a proposal is unlikely to meet required pollution standards.
- 4.41.11 The traffic generated by a Schedule 2 use could vary from smaller vehicles using a Civic Amenity Site to large lorries servicing the other options. I do not see this as generally exceeding the traffic potential of Class B2 and B8 uses as a matter of principle. However, any development proposal will be considered against GWLP policy 39 to ensure that traffic problems are not caused and the Site Profile draws attention to the relevant points. Area F is outside the industrial estate and would need substantial access improvement.
- 4.41.12 I believe that landscape impact concerns on Areas A and C could be met in the regulation of the details of any scheme. There are very large buildings and emission stacks in and around the industrial estate, especially towards the south of Area C. I do not feel I can rule out an appropriate and acceptable design being proposed on Areas A and C for the waste management options that could be acceptable. I have concluded above that landscape impact on Area F would be unacceptable in my view as contended by FED.

- 4.41.13 I do not feel that a **criteria-based approach** suggested by the District Council is right for the reasons explained in paragraph 4.30.18 of my report. The safeguarding provisions for sites and the **excess of sites over capacity** requirement are also necessary and sound for reasons I explain in my report at paragraphs 4.30.5 and 4.15.2.
- 4.41.14 For the reasons given, my **overall conclusion** is therefore that Areas A and C are acceptable but that Area F is not. Also, inert recovery and recycling and waste transfer would be unacceptable waste management options on these 2 areas as these processes are currently described and understood. Anaerobic digestion and in-vessel composting appear to have potential pollution risk so I do not recommend them on present evidence.

## RECOMMENDATIONS

- 4.41.15 Retain Site RD15 areas A and C in the Plan and delete areas B, D and E.
- 4.41.16 Not to add area F to the Plan as a preferred area or area of search.
- 4.41.17 Delete from Schedule 2 the potential waste management options of inert recovery and recycling and add Waste to Energy, Civic Amenity Site, MRF and Metals Recycling, advertising these additions if accepted.
- 4.41.18 Consider adding the Bell Waste Transfer Station site and its associated proposed employment area to Schedule 2 of the Plan.
- 4.41.19 Amend the Site Profile as follows:
- Site Specific Criteria for Development: add “To preserve a good environmental standard on the industrial estate, operations should take place within a building and screening should be considered in appropriate locations.”

## 4.42 Site 16 (Canal Works, Lydney)

### Comments

| Comments No. | Status (See Key) | Name                                    |
|--------------|------------------|---|
| 62040/8      | DO               | Forest of Dean District Council         |
| 86914/1      | DO               | Proctor S Mrs                           |
| 92465/2      | DLO              | Forest of Dean Conservative Association |
| 89808/13     | DO/W             | Robert Hitchins Ltd                     |
| 89808/6      | DO               | Robert Hitchins Ltd                     |
| 62043/7      | DO/W             | Gloucester City Council                 |
| 61768/3      | DO               | Friends of the Earth (FoD)              |
| 88797/4      | DO               | Federal Mogul Corporation               |
| 62016/7      | DO               | Gloucestershire Wildlife Trust          |
| 62040/10     | DO/W             | Forest of Dean District Council         |
| 62013/6      | DO/W             | English Nature                          |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) Reference should be made to all designated wildlife sites and their correct extent
- (ii) Strategic context of Lydney and transport by canal does not apply
- (iii) Employment development would be blighted.
- (iv) Residential and recreation areas downwind are too close and would suffer harmful effects.
- (v) Coastal policy FNE6 of the Local Plan restricts development.

- (vi) Flood plain location is inappropriate for this development.
- (vii) The site may be required for further landraising.
- ~~(viii) Drafting errors~~
- (ix) Transporting waste across the Severn may not be feasible.
- ~~(x) Page 79 the site is adjacent to a SSSI, SPA, Ramsar Site and SAC~~
- (xi) Lydney Marsh, Railway Sidings and other designations of the River Severn are omitted.
- (xii) Incorrect extent of land allocated for housing development and recreational use is shown.
- (xiii) Bullet point 3 should refer to the A38 (T) not the A48

### Inspector's Reasoning and Conclusions

- 4.42.1 The WPA amended the Plan to reflect environmental designations more correctly in RDGWLP. It proposes further amendments in WPA 31 to more correctly show estuarine designations which I support. These designations need to be correct so that they can be properly applied to any proposals. I believe the designations proposed at the close of the inquiry are correct.
- 4.42.2 Because the objections to Site 16 are common to the Harbour Road locations for Sites 17 and RD17, I have commented on them all together under Site RD17.

### RECOMMENDATIONS

- 4.42.3 Amend the environmental designations on the Inset Map for Site 16 as proposed in RDGWLP as amended by WPA 31.

### 4.43 Site RD16 (Canal Works, Lydney)

#### Comments

| Comments No. | Status (See Key) | Name                            |
|--------------|------------------|---------------------------------|
| 62040/3      | RDO              | Forest of Dean District Council |
| 62040/5      | RDO/W            | Forest of Dean District Council |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) The site has limited potential for additional fill.
- ~~(ii) Incorrect coastal zone boundary on RD16~~

### Inspector's Reasoning and Conclusions

- 4.43.1 Because the objections to Site 16 are common to the Harbour Road locations for Sites 17 and RD17, I have commented on them all together under Site RD17.
- 4.43.2 For the reasons explained in section 4.45 of my report I conclude that this site should be retained in the Plan.

### RECOMMENDATIONS

- 4.43.3 Retain Site RD 16 in the Plan.
- 4.43.4 Amend the environmental designations on the Inset Map for Site RD16 as proposed in RDGWLP as amended by WPA 31.



#### 4.44 Site 17 (Lydney Industrial Estate)

##### Comments

| Comments No. | Status (See Key) | Name                                    |
|--------------|------------------|---|
| 88924/2      | DO               | Kynaston I L                            |
| 88926/2      | DO               | Smith G H                               |
| 88925/2      | DO               | Rogerson L J Miss                       |
| 88349/2      | DO               | Davis E Miss                            |
| 88348/2      | DO               | Davis R Mr                              |
| 88347/2      | DO               | Smith A Mrs                             |
| 86914/2      | DO               | Proctor S Mrs                           |
| 87713/1      | DO               | Holmes David                            |
| 89808/14     | DO/W             | Robert Hitchins Ltd                     |
| 89808/7      | DO               | Robert Hitchins Ltd                     |
| 89877/3      | DO/W             | Ramblers Association FoD Group          |
| 88346/2      | DO               | Gee C R Mr                              |
| 88344/2      | DO               | Gee K M Mrs                             |
| 88355/2      | DO               | Martin D Mr                             |
| 88354/2      | DO               | Barnard D Mr                            |
| 88353/2      | DO               | Barnard W A Mrs                         |
| 88352/2      | DO               | Davis M Mrs                             |
| 88351/2      | DO               | Davis W Mr                              |
| 62013/4      | DO/W             | English Nature                          |
| 88999/2      | DO               | Martin A R Mrs                          |
| 88932/2      | DO               | Lamb Ted                                |
| 88931/2      | DO               | Lamb C                                  |
| 88930/2      | DO               | McKie A Mrs                             |
| 88929/2      | DO               | McKie Ian                               |
| 88928/2      | DO               | Newton M J Mr                           |
| 62606/1      | DO               | Post Office                             |
| 92465/3      | DLO              | Forest of Dean Conservative Association |
| 61768/4      | DO               | Friends of the Earth (FoD)              |
| 88797/5      | DO               | Federal Mogul Corporation               |
| 62016/8      | DO               | Gloucestershire Wildlife Trust          |
| 62040/11     | DO/W             | Forest of Dean District Council         |
| 62040/9      | DO               | Forest of Dean District Council         |
| 88927/2      | DO               | Newton A C Mrs                          |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

##### Summary of Objections

- (i) Object to incineration at Sharpness Docks and attendant waste collection sites at Lydney
- (ii) Blight would be caused to employment, tourism and leisure and regeneration.
- ~~(iii) Reference should be made to all designated wildlife sites and their correct extent should be marked on the map~~
- (iv) The residential environment would be degraded.
- (v) Conflict with Policy FNE6 of the Local Plan
- (vi) The site is within the flood plain
- (vii) The need to ensure high quality development
- ~~(viii) Drafting errors~~
- (ix) Access to 17B should be directly off the Lydney Bypass roundabout
- (x) Traffic impacts would be unacceptable
- (xi) Pollution concerns would be caused to humans and to wildlife in the SAC/Ramsar
- (xii) The type of facility to be provided is unclear.

- (xiii) ~~Failure to show public footpaths on either site~~
- (xiv) The extent of land allocated for housing development and recreational use is omitted
- (xv) ~~Bullet point 3 should refer to the A38 (T) not the A48~~
- (xvi) Sites able to maximise the development opportunities provided by major waste facilities should be favoured.

## Inspector's Reasoning and Conclusions

4.44.1 Site 17 in the Deposit GWLP comprised 2 large areas A and B adjoining industrial development off Harbour Road and, to the west, south of the A48(T) known as Mead Lane. These areas extended over the employment areas proposed in the emerging District Local Plan. RDGWLP retained Areas A and B but substantially reduced them in size. The objections to the Deposit GWLP seem to concern the principle of waste development in these 2 areas so I deal with them under Site RD17 in the next section of my report.

## RECOMMENDATION

4.44.2 Amend the details of Site 17 as per section 4.45 of my report.

## 4.45 Site RD17 (Lydney Industrial Estate)

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 98940/1      | RDO              | Dean Forest Railway                    |
| 88797/10     | RDO              | Federal Mogul Corporation              |
| 88797/1      | RDO              | Federal Mogul Corporation              |
| 98640/10     | RDO              | Trustees of W. J Liddington (Deceased) |
| 98640/1      | RDO              | Trustees of W. J Liddington (Deceased) |
| 62040/4      | RDO              | Forest of Dean District Council        |
| 62012/1      | RDO              | Highways Agency                        |
| 89808/3      | RDO              | Robert Hitchins Ltd                    |
| 61898/1      | RDO              | Woolaston Parish Council               |
| 65984/3      | RDO              | Lydney Land Resources                  |
| 65984/1      | RDO/C            | Lydney Land Resources                  |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

- (i) Siting of this dirty use would undermine efforts to improve the area.
- (ii) Designated nature conservation interests would be harmed.
- (iii) Water contamination, noise disturbance, associated transport activity, pollution from emissions, landfill gas etc require a precautionary approach.
- (iv) Residential amenity would be harmed.
- (v) The setting of Lydney Park Estate would be harmed.
- (vi) Local roads would be congested and existing employers' operations interfered with.
- (vii) Contrary to national planning guidance
- (viii) Requirements of BPEO should be included in the text.
- (ix) Present permissions and capabilities of existing waste sites are limited.
- (x) Concern over effects on A48(T) north of site A.
- (xi) Only the most low key facility would be acceptable
- (xii) Composting could be carried out on this site
- (xiii) The site off Harbour Road has flood problems.
- (xiv) Waste facilities would be intrusiveness at historic Lydney Harbour
- (xv) Land off Mead Lane is allocated for employment and is at risk from flooding.
- (xvi) Land adjoining the foundry is not suitable.

## Inspector's Reasoning and Conclusions

- 4.45.1 Because Sites 16/RD16, 17 and RD 17 have many common issues I deal with them together in this section of my report, differentiating the areas where appropriate.
- 4.45.2 The areas of Sites 16 and RD16 on Harbour Road are identical. Site 17 comprised 2 large areas A and B adjoining industrial development off Harbour Road and, to the west, adjoining the Mead Lane development south of the A48(T). RD17 retains Areas A and B but substantially reduces them in size. RDGWLP also designates 3 areas between the Federal Mogul foundry and the railway crossing at Harbour Road and an area of search around the industrial estate at the eastern end of Harbour Road. However, the WPA's proposals in RDGWLP are further modified by WPA31 in which it seeks to withdraw 2 (D and E) of the 3 areas between Federal Mogul and the Harbour Road rail crossing, retaining the area beside Federal Mogul north of the A48(T) (Area C). The withdrawals are because of conflict with designation as Key Wildlife Sites. WPA31 also inserts more detail of environmental designations for the Severn Estuary. WPA31a suggests further amendments by adding criteria for development to the Site Profile for Site RD17 areas A, B and C.
- 4.45.3 The WPA seeks the following waste management options under Schedule Two. Site RD16: Materials Recovery Facility; Household Waste Recycling Centre; Waste Transfer Station; and Anaerobic Digestion. Inert Recovery and Recycling and Inert Landfill are already undertaken on the site. Site RD17: Waste to Energy Recovery; Materials Recovery Facility; Inert Recovery and Recycling; Metals Recovery; Household Waste Recycling Centre; Waste Transfer Station; Anaerobic Digestion. Area A adjoins Site RD16. Site B adjoins the Mead Lane industrial estate. Site C is currently being tipped with foundry material by Federal Mogul but is designated as a Key Wildlife Site. Site F is an industrial estate in need of regeneration.
- 4.45.4 The adopted **Forest of Dean Local Plan** (December 1996) allocates Site RD16 and RD17 Areas A and B for employment use. There are flood storage requirements under policy F.Lydney 4 for Area A and the Plan seeks high quality proposals sensitive to the landscape under policy F.Lydney 2 for Area B. Site RD17 Area C is unallocated and undesignated open land next to an important recreation area. Site RD17 Area D is allocated recreation/public open space under policy F.Lydney 11 and Area E is allocated for business or industrial use under policy F.Lydney 1. The historic quality of Lydney Harbour area is safeguarded by policy F.Lydney 10 which envisages some development, including housing, to finance restoration work. The adopted Local Plan carried forward a substantial area of allocated employment land not previously taken up. This Plan sees Lydney playing an increasingly important role in the planned economic development of the South Forest because of its accessibility and because of the varied development opportunities it could offer. Policy FE.1 promotes this. Policies FE.4 to FE.6 seek to ensure that new employment development is of good environmental quality and is sympathetic to neighbours.
- 4.45.5 The emerging Forest of Dean First Deposit Local Plan Review (July 2000) promotes a concentration of development in the southern part of the District including major housing and employment allocations in Lydney. Policy (R)FE.1 is particularly relevant. Redevelopment to achieve environmental improvements is carried forward in policies (R)FE.2 and 3. Site RD16 and Site RD17 Areas A and B are carried forward for Classes B1, B2 and B8 employment use, subject to flood storage requirements under policy (R)F.Lydney 7 for Site RD16 and Site RD17 Area A, and under policy (R)F.Lydney 6 for Area B. Area B continues to seek high quality proposals sensitive to the landscape. Site RD17 Area C remains unallocated open land next to important recreation areas. Housing land is allocated to the east of Federal Mogul under policies (R)F.Lydney. 1 & 2. Site RD17 Area D continues to be allocated for recreation/public open space under policy (R)F.Lydney 13 and Area E's allocation is changed to regenerate use of the railway under policy (R)F.Lydney 9. The historic quality of Lydney Harbour area is safeguarded by policy (R)F.Lydney 14 but through an allocation for recreation, leisure and tourism and not housing. All the areas relevant to the GWLP are within the Developed Coastal Zone and

are subject to policy (R)FNE.6 which seeks to safeguard the environmental quality and recreation value of the coastal zone and prevent flood risk, erosion and damage.

- 4.45.6 I agree with the removal of **Areas D and E from Site RD17** at this stage of the Plan's evolution because of the conflict with nature conservation interests and with allocations in the emerging District Local Plan, and because other sites proposed have good potential as I explain below.
- 4.45.7 The proximity principle seeks to place waste facilities as close as possible to arisings. The areas proposed in RDGWLP fulfil that role. Lydney is a significant and expanding settlement. It has an operational rail link with potential for improvement. It has a harbour, although in need of renovation, with potential for transport via the Severn Estuary to Sharpness and other ports. Rail and water transport could play an important part in achieving optimum sustainability in the long term. I observed no obstacle to navigability in the estuary. I report on Sharpness at section 4.26 of my report. Lydney therefore needs to have a range of waste management facilities to meet the objectives of the GWLP. No alternative locations to those proposed in the 2 versions of the GWLP are proposed by the District Council or other parties.
- 4.45.8 The emerging policies specify use classes in making employment allocations. Some waste uses could be within Use Class B2 but others may be sui generis. Nevertheless, waste uses are employment uses and need to find appropriate sites for facilities. Some waste uses take place now on Site RD16 and on Site RD17 Areas A and C. The adopted and emerging Local Plans do not preclude waste uses as such but seek to ensure that appropriate environmental standards are achieved. Bearing in mind the increasing requirement to enclose waste activity in buildings and improving standards and technology, I do not see why, during the period to 2012, and from a district local plan viewpoint, Site RD16 and Site RD17 Areas A, B, C and F should not be able to accommodate those waste management options that can integrate sympathetically with their surroundings. I consider these options below to see if any should be excluded on the basis that it is unlikely that they would be appropriate.
- 4.45.9 I am also mindful that the emerging District Plan is further from adoption than the GWLP. It seems unnecessarily inflexible to exclude appropriate waste management, and other, options from employment areas by defining acceptable development simply in terms of the Use Classes Order without making provision for sui generis uses that could be compatible with those Use Classes.
- 4.45.10 **Site RD17 Area C** is still being used by Federal Mogul for disposal of arisings from their foundry and this seems likely to continue for the foreseeable future. If disposal by Federal Mogul were to take place elsewhere, transportation would be required which would be less sustainable. The area is sufficiently removed from present and proposed housing to enable the less noisy and less dusty waste management options to be implemented although the housing would often be downwind. The adjacent recreation areas also need careful design and regulation to avoid them being environmentally degraded.
- 4.45.11 Direct access could be made from Area C onto the A48(T) although a proliferation of accesses should be avoided. It seems therefore that this area, which is already in use for landfilling, and which the District Council views as having employment potential in future, could be adapted to other waste management uses in due course. However, there are other locations that are suitable now and this site has the material disadvantage of being designated as a Key Wildlife Site. By constructing buildings on the land and probably increasing operational activity, all the waste management options are likely to prejudice nature conservation interests. For these 2 reasons, and the continuing need of Federal Mogul for a convenient disposal facility, I conclude that Site RD17 Area C is not suitable for any of the waste management options at this stage. However, this area could be reconsidered in the 5 year review of the Plan by which time circumstances may have changed.

- 4.45.12 **Site RD17 Area B** has been earmarked by the District Council for prestigious industrial and business development for some years. Landscape impact is an important factor in the adopted and emerging policies. These factors limit the waste management options appropriate to those taking place within buildings, which are served by haulage traffic of a presentable character and which do not risk emitting smells. Waste to energy, inert recovery and recycling, waste transfer, anaerobic digestion and in-vessel composting seem unlikely to be acceptable. Landscape impact would be mitigated by Area B being relatively low lying and distant from the most public viewpoints with heavy industry adjoining on rising land. Area B does not seem to be covered by the flood plain but is on its edge (FED/Doc/4). I therefore conclude that Area B should be retained in the Plan subject to guidance in the Site Profile about the sensitivity of the location. I agree with the amendment proposed in WPA 31a subject to minor changes.
- 4.45.13 **Site RD17 Area F** is proposed as an area of search but I believe it has the best potential of all the areas proposed in Lydney for a range of waste management options enclosed in buildings. It is close to the harbour with potential for access to the Severn Estuary in the future. It seems to have potential access to the railway over disused track. For the most part it is not within the flood plain, unlike Site RD16 and Site RD17 Areas A, C, D and E. It is most distant from housing. It is an industrial area in need of renovation that may have included an old incinerator. It is not affected by especially restrictive policies or environmental designations other than those also affecting Site RD16 and RD17 Area A. The District Council seems to accept allocation of Area F as an area of search for waste management in contrast to other proposals in RDGWLP.
- 4.45.14 Area F is criticised by objectors because waste uses there may have an adverse effect on **tourism and leisure** use but that seems inconsistent with the need for waste uses to go somewhere; the presence of this and neighbouring present or proposed industrial areas; and that much needed local regeneration is likely to come from investment in industry. Besides, I do not believe that many waste uses appropriately designed, sited and regulated would prejudice tourism and leisure uses of the harbour area. The harbour area is historically a working area and that is being carried forward into the future by the industrial development existing and planned off Harbour Road. Proposals to regenerate Lydney Harbour, including the maintenance of the Harbour North Scheduled Ancient Monument, through Lottery Funding are naturally welcome. However, from my reading of the District Local Plans and looking at waste requirements, it seems to me that tourism and leisure must co-exist with industry and business at this important waterside area concerning Area F and Area A of Site RD17 and Site RD16.
- 4.45.15 Because of the degree and nature of objections to RDGWLP, and the good potential of Area F, I believe it should be an allocated area and not an area of search so that the safeguarding provisions of policy 7 will apply effectively.
- 4.45.16 **Site RD16 and RD17 Area A**, including the larger Area A proposed in Site 17 and suggested by Lydney Land Resources, all suffer from being in the flood plain. This is a significant disadvantage given likely climate change effects. The larger Area A, much of which has not been raised by landfill, seems to be particularly important to alleviate flooding. However, its proximity to the railway along its northern side could be of particular value if flood compensation measures and flood prevention in construction could enable this larger area to be used. This in effect is what is said in emerging District Local Plan policy (R )F.Lydney 7 which designates this larger area for employment, although it is seen as being of limited value for the time being pending flood prevention works. The sequential test in Table 1 of PPG25 would need to be applied once a risk assessment has been carried out.
- 4.45.17 Because of the importance of rail and water transport to waste, and the potential compatibility of waste uses with those in Area F, I see no reason why the preferred waste area A should not enclose the fringe of the large Area A to the north, east and south terminating a reasonable distance from housing at Cookson Terrace where Class B1 use is appropriate. The detail of the area is shown clearly on the plan attached to LLR/Doc/1. I do not suggest including the whole of the proposed industrial area because I feel it would be

unnecessarily inhibiting to apply the safeguarding provisions of the GWLP to any greater area of land than is required and to areas in the centre and near housing that are likely to be less acceptable.

- 4.45.18 Site RD16 and Site RD17 Area A have been landfilled and raised to a level above the flood plain. Landraise operations continue and are envisaged to do so for an extended period in Area A under transport restrictions. Given adequate distance from the housing at Cookson Terrace, and subject to flood risk constraints, these seem appropriate areas for waste management uses in parallel, and consistent, with the landraise operations. Waste transfer and inert recovery and recycling seem particularly suitable given appropriate design and controls, including adequate protection to Class B1 uses at Marina Park. No other location in Lydney is proposed that is more suitable at this stage of the evolution of GWLP.
- 4.45.19 I now turn to general issues. **Landscape impact** is important in all areas under consideration, not least under District Local Plan policy (R)FNE6, however all of the sites I recommend to be retained are now industrial or are proposed to be industrial in the adopted or emerging District Local Plans. Area C is close alongside the substantial mass of the Federal Mogul foundry building. The area displays an established but evolving industrial character. For these reasons I do not consider it unusual or inappropriate for waste management uses to be proposed here. I have mentioned Area B earlier. Given good design and suitable landscaping, which would be required of any other industrial development, I do not see why the proposed sites and areas off Harbour Road or Site RD17 Areas B and C should be excluded from the Plan for reasons of landscape impact.
- 4.45.20 As to **traffic impact**, designated and constructed employment areas including Site RD17 Areas A and F and Site RD16 are all served by Harbour Road. The road continues as a track to the harbour lock entrance which is an ancient monument, and the Lydney Yacht Club. Harbour Road is susceptible to interruption and congestion because of the railway level crossing, however this is a problem common to all employment uses so this is not an objection in principle to rule out any particular waste management option. The District Council considers that employment allocations can be accommodated although some waste uses may have relatively high generation. However, assessment will be needed of proposals under RDGWLP policies 38 and 39 once details are known to ensure that traffic generation does not exceed the capacity of Harbour Road. This would include consultation with the Highways Agency if traffic flows on the A48(T) were likely to be materially affected. In the longer term rail and water access may have potential.
- 4.45.21 Needless to say, while I cannot rule out the sites along Harbour Road on highway grounds, it should be noted that the potential problem for congestion due to the level crossing highlights the need to retain Area B which, once access improvements have been constructed to alleviate the problems in Church Road highlighted by Mr Holmes, has less obvious traffic constraints. This advantage also applies to Areas C, D and E if ever they were to be considered acceptable for waste in other respects.
- 4.45.22 I have addressed objections to **incineration and waste to energy technology** at sections 4.7 and 4.9 of my report. Subject to proper controls in construction and management, I find no objection in principle to locating such a facility on Site RD16 or on Site RD17 Areas A, B and F. This is on the basis that the locations are currently or proposed for industrial uses and seem capable of affording adequate distance from housing and accepting the traffic which would be generated. My only reservation is that arrangements could be made to ensure that any facility on Site RD17 Area B did not detract from the quality of the Mead Lane employment area by, for example, the character of its waste transportation.
- 4.45.23 I have some sympathy with the District Council's concern that its efforts on regeneration and attracting inward investment could be **blighted** by the waste management facility allocations. Hence my comments above on Site RD17 Area B. This is because many waste operators have not achieved very good environmental standards. However, if waste is to be managed in a sustainable way, and be more integrated with other uses that generate arisings, then waste management standards need to improve. Similar fears have been expressed about some of the other proposals in the Plan and my conclusions on this matter remain the

same. I do not agree with arguments that waste management facilities would by definition have a negative effect on regeneration. Many modern waste management facilities can be contained within buildings of a design that is compatible with, and complementary of existing industrial uses in the area. Transportation and handling methods are improving. To my mind, provided that a waste management facility is well designed, contained and effectively regulated, it should not have a negative effect on regeneration in future. However, until techniques for some waste management methods improve, there will still be a need to accommodate those uses at greatest risk of emitting smell, dust and noise.

- 4.45.24 It has been suggested that the proposals may be in conflict with Local Plan housing policies and the amenity of existing residential areas. From my examination of the proximity of existing dwellings and housing allocations to all sites, I feel that an objection on these grounds is weak. I recognise the vulnerability of residential development to dust, smell, noise and other effects from waste management facilities in close proximity. However, I am satisfied that the distances involved, the flexibility for siting appropriate options in the various defined areas and the ability to enclose facilities are sufficient to mitigate effects to acceptable levels. RDGWLP policy 36 (Proximity to Other Land Uses) and Policy 37 (Hours of Operation), for example, provide a useful safeguard at the planning application stage.
- 4.45.25 I have addressed nature conservation interests for Site RD17 Areas C, D and E above. FED believes that the Severn Estuary areas would be affected but I do not agree that this is an inevitable consequence of what is now proposed. I believe that appropriately designed, located and regulated facilities would not cause pollution and harm to nature conservation and other interests. This means taking any special measures necessary to allow for rising water levels and restricting some of the waste management options to appropriate locations within the allocated areas. As I have suggested, all options are not necessarily appropriate on all allocated locations. This could become clear in a BPEO appraisal in accordance with GWLP policy 1.
- 4.45.26 I comment on the merits of criteria-based policies in preference to a site specific plan in paragraph 4.30.18 of my report.
- 4.45.27 My overall conclusion is that Site RD16 together with Site RD17 Area A could serve a useful purpose in accordance with national Waste Strategy, RPG10 and the Structure Plan for those waste management options with greater environmental impact while landfilling and landraising continue. This could include in-vessel composting given adequate control. Site RD17 Area F has very good potential for options compatible with Class B2 uses and Area B for a good quality facility. Site RD17 Areas C to E do not seem appropriate to be included in the Plan at this stage.

## RECOMMENDATIONS

- 4.45.28 **Retain Site RD17 in the Plan subject to the amendments recommended below.**
- 4.45.29 **Amend the environmental designations on the Inset Map for Site RD17 as proposed in WPA 31.**
- 4.45.30 **Amend the area of Site RD17 designated A in WPA 31 by reducing its western end to provide more distance from housing and by extending it along its eastern and northern fringe to the eastern point of Area E.**
- 4.45.31 **Retain the area of RD17 designated B in WPA 31 as drafted.**
- 4.45.32 **Delete the 3 Areas designated C, D and E in WPA 31 from Site RD17.**
- 4.45.33 **Amend the area of Site RD17 designated F in WPA 31 as an allocated area instead of an area of search.**
- 4.45.34 **Add to the Site Profile of Site RD17 under “Criteria for Development”:**

“Unless flood prevention and compensation measures can be undertaken as part of the waste or other development of Area A, some parts of the area will not be able to be used. Attention is drawn to the Forest of Dean District Local Plan policies.”

“Area B is part of an important approach to the town of Lydney. Industrial development is expected to enhance the image of the town through a high standard of design, construction and landscaping. Waste management facilities, including operational areas, should be enclosed within buildings and will be expected to be sympathetic to surrounding development. Attention is drawn to the Forest of Dean District Local Plan policies.”

“Some waste management options will not be appropriate to some areas.”

#### 4.46 Site RD18 (Wingmoor Farm South East, Stoke Orchard/Bishop's Cleeve)

##### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 89808/4      | RDO              | Robert Hitchins Ltd                    |
| 61644/1      | RDO              | Shurmer Gordon Cllr                    |
| 62012/2      | RDO/C            | Highways Agency                        |
| 60573/1      | RDO              | Gloucestershire Sand and Gravel Co Ltd |
| 61775/4      | RDO              | Prestbury Parish Council               |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

##### Summary of Objections

- (i) Site is beyond present landfill
- (ii) Impacts on the M5 need to be assessed.
- (iii) Stoke Road is a 'B' Road, narrow in places and passes through a small village.
- (iv) The site is too close to existing houses
- (v) Contrary to Green Belt policies.
- (vi) The site adjoins an AONB and farms.

##### Inspector's Reasoning and Conclusions

- 4.46.1 An error occurred in defining the boundary of Site RD18 in RDGWLP. The corrected version, which is understood to accord with the current licence for landfill/landraise, was placed before the inquiry as WPA 31 Inset Map RD18. This revised area is much smaller than the original version and does not extend so far to the east towards Lower Farm. Schedule 2 needs to be corrected to show the existing waste management use of the site and the site title as being at Bishop's Cleeve rather than at Stoke Orchard.
- 4.46.2 My comments on the strategic Sites 1 and 2 (Wingmoor Farm West and East) at sections 4.20 and 4.21 of my report largely apply to this site, including corrections to the Site Profile. I believe the site to be seriously flawed in the long term by its Green Belt status. Access limitations are not so great for an essentially local facility, attracting less traffic than a strategic site, but they are nevertheless present and may require a Transport Assessment.
- 4.46.3 Site RD18 is much closer to the main housing area in Bishop's Cleeve than Sites 1 and 2 although there seems to be ample scope for adequate amenity protection. I see no reason why composting should not be added to the waste management options subject to appropriate safeguards such as containment. Waste to energy is not proposed as an option for this site. The mounding on the site could help to obscure some waste operations in the landscape when viewed from the AONB.



- 4.46.4 There is also the point that significant capacity is provided by the 2 strategic sites and, where there are cogent objections, as here, new development should not take place without good justification. Site 1 Area B has permanent buildings and Site 2 has minerals workings so both of these areas have better potential than Site RD18 for further exploitation. Site RD18 is not essential to provide the Plan with adequate new waste management capacity.
- 4.46.5 There is obvious force in the argument that Site RD18 should be exploited while operations that are already permitted continue, as suggested in PPG10, but I believe it would be wrong for that exploitation to permit permanent development contrary to Green Belt objectives or to expand or consolidate development simply because it has become historically established. Any new development should be limited to the life of landfill/landraise and help to expedite restoration and the openness of the site.
- 4.46.6 For all the above reasons it is questionable whether Site RD18 should feature in the Plan as a site with future potential for expansion and provision of new facilities. However, I do not recommend exclusion of the site from Schedule 2 at this stage for 3 reasons. Firstly, with demountable buildings and structures, the site could play a valuable part in waste management during the Plan period in accordance with RDGWLP Policy RD25 and so is not fatally flawed for this period. Secondly, any proposal for a new facility must demonstrate need and BPEO before it could take place. Thirdly, it is important that there is a reasonable range of sites in the Plan to secure the BPEO.

#### RECOMMENDATIONS

- 4.46.7 Retain Site RD18 in the Plan.
- 4.46.8 Amend Inset Map RD18 by inserting the version appended to WPA 31.
- 4.46.9 Amend the site title in Schedule 2, the Inset Map, the Site Profile and Policy 5 by replacing "Stoke Orchard" with "Bishop's Cleeve".
- 4.46.10 Site Profile: Location: First sentence second line amend "south west" to read "south east".
- 4.46.11 Site Profile: Constraints: Access, delete the first sentence and substitute "Main access to the site by road is from Stoke Road from the A435 to the east. Stoke Road to the west is restricted to vehicles passing through of less than 17 tonnes."
- 4.46.12 Site Profile: Constraints: Proximity to Dwellings: add "Settlements of Bishop's Cleeve and Gotherington nearby to the north east, Brockhampton, Stoke Orchard and other small settlements around the south and west of the site."
- 4.46.13 Site Specific Criteria for Development: add this category to the notes with the following paragraphs:

"New waste management facilities should be designed, and if necessary contained, to ensure that dust, odour, fumes, noise, litter and other effects do not have a materially adverse impact on nearby residents and businesses."

"Stoke Road requires improvement from the site to its junction with the A435. Improvements are needed to Stoke Road for pedestrians and cyclists. A Transport Assessment for any application for planning permission may be sought in accordance with Policy 39 assessing routes to connect with the M5, Cheltenham, Gloucester and Tewksbury."

"The Green Belt status of the site may require demountable buildings to be provided and their use limited to the duration of the landfill/landraise operations."

- 4.46.14 Review the future waste management role of Site RD18 in relation to the completion of its landfill function and in the context of Green Belt policies. Further develop the Site Profile in the light of the conclusions of this review.
- 4.46.15 Add composting to the list of potential waste management options in Schedule 2 and add landfill as an existing waste management option.

#### 4.47 Site RD19 (Foss Cross Industrial Estate, Calmsden)

##### Comments

| Comments No. | Status (See Key) | Name                        |
|--------------|------------------|-----------------------------|
| 61953/1      | RDO              | North Cerney Parish Council |
| 62013/3      | RDO              | English Nature              |
| 62012/3      | RDO/C            | Highways Agency             |
| 62042/2      | RDS              | Cotswold District Council   |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

##### Summary of Objections

- (i) Identify and safeguard Foss Cross Quarry SSSI.
- (ii) Impacts on the A417 (T) could be of concern.
- (iii) Traffic flowing through North Cerney could cause problems.
- (iv) The residents of Old Gore Barn (Grade II Listed) could suffer significant nuisance.

##### Inspector's Reasoning and Conclusions

- 4.47.1 WPA 31 corrects the omission of the SSSI at Foss Cross Quarry.
- 4.47.2 The site is identified as having potential for a new composting facility only. Its capacity would not exceed 50,000 tonnes per year. The traffic generation for such a facility would not seem to be of great magnitude at an average of 20 x 10 tonne lorries per day. This is likely to have little impact upon the A417 which is on the fringes of Cirencester 6.5 km to the south. No evidence is submitted to suggest a highway problem on the trunk roads that requires special consideration and my site inspection did not reveal one.
- 4.47.3 The problems of weekend traffic reported by South Cerney Parish Council needs survey evidence and analysis to form a clear conclusion. However, if such a problem is likely from a new installation, because of the routes and types of vehicle that would be used, then conditions restricting the opening times of the facility, and perhaps other limitations, may be merited. A reasonable amount of traffic needs to be accepted in this rural area where waste facilities are few and far between. However, a sensible balance needs to be struck in assessing detailed proposals, especially for heavy vehicles travelling on the narrow and winding minor rural roads.
- 4.47.4 I looked carefully at the juxtaposition of Old Gore Barn and the site. I am clear that, provided any waste management scheme is properly designed and appropriate conditions are imposed on any planning permission and process permit, then nearby residents would not suffer nuisance from a composting facility. It is clearly important that provision is made preventing smells or any form of pollution to materially harm neighbours and this is provided for in policy 36 of the Plan. For these reasons I conclude that the site should be retained in the Plan.

##### RECOMMENDATIONS

- 4.47.5 Retain Site RD19 in the Plan.

- 4.47.6 Substitute the Inset Map and Site Profile for Site RD19 in WPA 31 for that published in RDGWLP.

#### 4.48 Site RD20 (Old Airfield, Moreton Valence)

##### Comments

| Comments No. | Status (See Key) | Name          |
|--------------|------------------|---------------|
| 92199/1      | RDO              | Douglas Julie |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

##### Summary of Objections

- (i) The proposal for EFW at Wingmoor Farm would cause environmental damage to SSSI and internationally recognised wetlands in the Severn Estuary.

##### Inspector's Reasoning and Conclusions

- 4.48.1 EFW is not proposed for Site RD20. I have considered EFW for Wingmoor Farm at section 4.20 of my report and the effects of incineration on the Severn SSSI and wetlands in my report at section 4.26 (Sharpness).
- 4.48.2 I find no cogent objection to Site RD20 which, according to the correction proposed by the WPA at page 99 of its responses to the Deposit Draft version of the Plan, is seen as a facility for inert recovery and recycling only. The Site Profile describes these operations being undertaken now and the WPA wants them to continue (WPA31).
- 4.48.3 Referring to section 4.28 of my report (Schedule 2), the site is not in an AONB and has relatively good access to the major road network. It is conspicuous in open countryside but has planning permission for recovery and recycling.

##### RECOMMENDATIONS

- 4.48.4 Retain site RD20 in the Plan.
- 4.48.5 Amend Schedule 2 Site RD 20 of the Plan to include inert recovery and recycling as an existing operation.

#### 4.49 Site RD21 (Site adjacent to Gasworks, Bristol Road, Gloucester)

##### Comments

| Comments No. | Status (See Key) | Name                    |
|--------------|------------------|-------------------------|
| 62043/9      | RDO              | Gloucester City Council |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

##### Summary of Objections

- (i) EFW is unacceptable on this site.
- (ii) Housing is nearby and needs protection.
- (iii) The BT site off Hempsted Lane is not allocated for housing.

## Inspector's Reasoning and Conclusions

- 4.49.1 The City Council accepts that this site is appropriate for Class B1, B2 and B8 uses subject to amenity safeguards for nearby residents. The Site Profile flags up potentially vulnerable neighbours and safeguards are provided in the Chapter 5 policies and particularly policy 36.
- 4.49.2 The proximity to housing and the site's location relative to the prevailing wind and the city makes EFW unacceptable to the City Council. However, for reasons explained in sections 4.7 and 4.9 of my report I do not feel that these reasons are sufficient to rule out EFW as an option for this site although such a facility will need to demonstrate its safety before it could operate. I therefore conclude that the site and its potential waste management options should be retained in the Plan unamended.

## RECOMMENDATION

- 4.49.3 No change to the Plan as a result of this objection.

## 4.50 Site RD22 (Netherhills Pit, Frampton-on-Severn)

### Comments

| Comments No. | Status (See Key) | Name                               |
|--------------|------------------|------------------------------------|
| 61871/1      | RDO              | Frampton On Severn Parish Council  |
| 62041/2      | RDO/C            | Stroud District Council            |
| 62012/4      | RDO/C            | Highways Agency                    |
| 62013/2      | RDO/C            | English Nature                     |
| 61840/1      | RDO              | Fretherne With Saul Parish Council |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) Frampton Pools SSSI Area of High Quality Landscape (watercourse) need to be recognised and safeguarded.
- (ii) The suitability of the site for a waste recycling operation is questioned.
- (iii) Concern about cumulative impact on the environment and local infrastructure
- (iv) The need for such a site is questioned with similar sites nearby.
- (v) Lack of information regarding the nature of the proposal and its degree of permanence.
- (vi) Present smells of methane gas and flooding problems will be added to.
- (vii) Cumulative impact of this and other sites on the M5 junction 13 could be unacceptable.
- (viii) Administrative and procedural objections.

## Inspector's Reasoning and Conclusions

- 4.50.1 The WPA accepts the need to recognise and safeguard the Frampton Pools SSSI and the designated Area of High Quality Landscape (watercourse) (WPA 31). It also accepts that the description of existing operations in the Site Profile should exclude reference to work having commenced on the blocks of land to the south and that the inert landfill site to the north eastern side of The Perry Way should be added to the list of existing waste management facilities in Appendix 5 of RDGWLP (WPA 31a).
- 4.50.2 The site is permitted for sand and gravel extraction with limited inert infill. The WPA, following the guidance on potentially suitable sites in PPG10 Appendix A at A51, intends that inert recovery and recycling should take place within permitted extraction operations. I agree with this approach in principle. The extraction operations inevitably degrade the environment so it is logical that operations of a similar character should be co-located with them rather than to cause proliferation of such operations around the County. However, to

be sustainable, waste operations should not prolong restoration of the site. This means that waste facilities should be demountable. This is a countryside area some distance from waste arisings so it would be wrong to permit permanent development on a site that is temporarily disrupted due to minerals working and scheduled for restoration.

- 4.50.3 For similar reasons I believe it would be wrong to commence waste operations on the blocks of land to the south when minerals extraction has not been commenced. I therefore propose that these areas be included in the Plan as areas of search rather than as preferred areas at this stage.
- 4.50.4 As the County Council does not wish to see the minerals voids infilled (according to the Site Profile), this seems to reduce the value of the site as a waste facility. The Site's restoration may not be expedited by waste processing and additional transportation would be required for materials recycled and recovered and for final disposal of residues. I note the landfill sites nearby.
- 4.50.5 Despite the advantage of the site by virtue of its ongoing operations, it only seems to have limited capability as well as not being particularly well placed for arisings. The Plan focuses on BPEO, rather than operator interest, although the latter is relevant if new waste facilities are to be brought into use. I therefore share objectors' concerns over the selection of this site. I question site selection generally at section 2.18 of my report. However, a choice of sites in the Plan is important, BPEO will need to be established if a planning application is made for a waste management facility at this site; and the Plan is evolving. I therefore do not recommend removal of this site from Schedule 2. However, I do feel that its inclusion should be reviewed in due course.
- 4.50.6 If a planning application comes forward, the details of a proposal will then be known and will be able to be fully assessed. This will include its cumulative impact with other uses nearby. As the WPA says, diversion from landfill and recycling and recovery of waste have become increasingly important to achieve a sustainability of waste arisings in the future and this site ostensibly has some potential to support that goal during the Plan period.
- 4.50.7 The Environment Agency was involved in drafting the RDGWLP and has commented upon it. From the evidence I do not feel that, in principle at least, a waste facility of the sort proposed could not be designed so that flooding and pollution are avoided. The Agency would be consulted on any planning application. Inert waste should not produce methane gas to which some objectors refer.
- 4.50.8 This facility would be relatively small scale, being of no more than 50,000 tonnes per year in capacity. Dust, noise and other effects would need to be controlled to ensure that the impacts presently felt by nearby residents and patrons of the Grade II listed Frombridge Mill restaurant become no worse than at present in accordance with the Plan's Key Objectives. I believe that this could be achieved given care in the design and construction of a facility and in the conditions attached to any planning permission and process permit. Occupiers of the nearest houses to the site are particularly vulnerable. Similarly, I do not believe that the Conservation Area of Industrial Heritage would be materially harmed by an appropriate waste facility. This is a rural area with a working farm and a small industrial estate forming part of the settlement. I note that Netherhills Farmhouse is also listed Grade II.
- 4.50.9 On highway impact, the Plan makes provision at Policy 39 for a Transport Assessment if required. It would be helpful if this were to be flagged up in the Site Profile. I find no obvious highway objection from the evidence.
- 4.50.10 My jurisdiction does not extend to the administrative and procedural objections. The public inquiry process has taken Frampton on Severn Parish Council's objections on board. I have considered them and I have explained my assessment. Frampton on Severn Parish Council has had full access to this process. I have the impression that there may have been some misunderstanding about the local plan procedure.

## RECOMMENDATIONS

**4.50.11** Retain Site RD22 in the Plan but reconsider its inclusion during the Plan's 5 year review.

**4.50.12** Amend the Inset Map for Site RD22 to show:

- the Frampton Pools SSSI and the Area of High Quality Landscape (watercourse).
- The 2 southernmost blocks of land as areas of search delineated by dotted lines (- - -) and the decode box amended accordingly.

**4.50.13** Amend the Site Profile to:

Delete the last sentence of "Existing Operations".

include reference to:

- the Frampton Pools SSSI and the Area of High Quality Landscape (watercourse) and the need to safeguard them.
- The potential for causing congestion at junction 13 of the M5 and the possible need for a transport assessment.

**4.50.14** Add the inert landfill site to the north eastern side of The Perry Way to the list of existing waste management facilities in Appendix 5 of RDGWLP.

## 4.51 Site RD23 (Sharpness Docks North West)

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 90136/1      | RDS              | Scott G H                              |
| 89737/1      | RDO              | Varnam Ron Mr                          |
| 89719/1      | RDO              | Varnam R Mr                            |
| 89837/1      | RDO              | Holmes E Mr                            |
| 62013/1      | RDO/C            | English Nature                         |
| 98059/1      | RDO              | Varnam B Mrs                           |
| 89738/1      | RDO              | Varnam Sam                             |
| 89739/1      | RDO              | Varnam Emily                           |
| 98038/1      | RDO              | Varnam A Mr                            |
| 89724/1      | RDO              | Menelaws A N Miss                      |
| 98701/1      | RDO              | Simpson C Mrs                          |
| 88745/1      | RDO              | Kane John Patrick                      |
| 62041/1      | RDS              | Stroud District Council                |
| 62637/11     | RDO              | Cory Environmental (Glos) Ltd          |
| 62637/9      | RDO              | Cory Environmental (Glos) Ltd          |
| 98640/16     | RDO              | Trustees of W. J Liddington (Deceased) |
| 88797/16     | RDO              | Federal Mogul Corporation              |
| 89985/1      | RDO              | Farthing J M                           |
| 89961/1      | RDS              | Sterry Hilary Mrs                      |
| 87290/1      | RDO              | Price K E                              |
| 87287/1      | RDO              | Price Margaret Christina               |
| 88195/1      | RDO              | Price J E Mr                           |
| 88641/1      | RDO              | Price A Mrs                            |
| 88640/1      | RDO              | Price M Master                         |
| 88639/1      | RDO              | Price Hannah Miss                      |
| 88638/1      | RDO              | Price B J Mr                           |
| 61998/7      | RDO              | British Waterways                      |
| 61998/5      | RDO              | British Waterways                      |

# Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

|         |       |                      |
|---------|-------|----------------------|
| 89740/1 | RDO   | Varnam B Mrs         |
| 88079/2 | RDO/W | Eley R S Mr          |
| 89716/1 | RDO   | Church D Mrs         |
| 61850/1 | RDO   | Dursley Town Council |
| 88826/1 | RDS   | Bye Christina Mrs    |
| 88327/1 | RDS   | Vaughan Kenneth John |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

- (i) Object to the deletion of Sharpness Docks as a Schedule 1 site so promoting sustainable transport links
- (ii) Failure to allocate a full range of potentially sustainable waste management options.
- (iii) Location is acceptable and conforms with national guidance
- (iv) Site is not environmentally sensitive or constrained by the Stroud Local Plan or access and it is not in close proximity to larger residential areas
- (v) Restrict use to exclude energy from waste.
- (vi) The Berkeley Bypass needs to be extended through Mobley to the A38 at Applegates
- (vii) The full extent of environmental designations are not illustrated
- (viii) Remove all proposals from Sharpness on grounds of pollution, nature conservation, traffic etc
- (ix) The facility should be located in an industrial area

## Inspector's Reasoning and Conclusions

- 4.51.1 I have dealt with objections concerning the deletion of Sharpness from the Plan as a Schedule 1 site at section 4.26 of my report. This Schedule 2 site comprises part of site B shown as B2 on some plans. It wraps around the south and eastern parts of the Plasmega building in the port complex.
- 4.51.2 The range of objections to this smaller site is similar to those against the Schedule 1 site. Only the waste management option of a materials recovery facility is proposed in RDGWLP. Energy from waste, recovery and recycling, anaerobic digestion, waste transfer and composting are not proposed but their omission is objected to.
- 4.51.3 The key problem with Sharpness as a location is that it is not close to major waste arisings. As explained at section 4.26 of my report, it may be possible to overcome this deficiency in order to achieve BPEO by use of water or rail transportation. However, as Cory and British Waterways assert, making that transport viable is likely to mean expanding the capacity of the facility to over 100,000 tonnes per year so becoming a Schedule 1, and not a Schedule 2, site. Waste could be brought in by sea via the estuary now, but almost certainly from outside the County, giving it a regional dimension, unless Lydney's waterway facilities find funding and are improved. I do not have evidence to show that these improvements are likely to occur within the Plan period. Taking care of the County's waste with a Schedule 2 site is therefore likely to be achieved by road transport. This could be BPEO if there are sufficient arisings in close proximity but this is not clearly the case.
- 4.51.4 The local impact of this smaller site, which is categorised for employment development in the emerging Stroud Local Plan, would in principle be less than for a larger facility. Road transport impact would probably be similar for Schedules 1 and 2 and would not be great averaging 10 x 20 tonne (or 20 x 10 tonne) lorries per day for 5 days per week. Heavy lorries already use the route but some improvements may be sought in proportion to the scale of development as stated in the Site Profile. To my mind therefore, use of the site for this purpose would be acceptable in principle for the reasons already explained in my report, but this site's sustainability as a smaller local facility would need to be established more clearly when any scheme is proposed under policy 1 (BPEO).

- 4.51.5 For the reasons explained in section 4.26 of my report I do not believe there are cogent grounds to exclude waste to energy or the other waste management options sought by Cory and British Waterways. Evidence that smaller waste facilities are becoming more viable with improving technology gives greater importance to the Plan having a broad range of potential options. Controls in the Plan seem to me to be adequate to protect local people and the environment generally from material harm.
- 4.51.6 The detail of some of the environmental designations in the Inset Map seems to be in error and needs verification and correction. The re-instatement of Site 6 would render Site RD23 unnecessary as it forms part of Site 6 Area B.

#### RECOMMENDATIONS

- 4.51.7 Retain Site RD23 in the Plan unless it is superseded by reinstatement of Site 6.
- 4.51.8 Check the type and extent of environmental designations on the Inset Map for Site RD23 and revise them as necessary.
- 4.51.9 Add the following waste management options to Schedule 2 Site RD23: Waste to Energy Recovery; Inert Recovery and Recycling; Metals Recycling; Household Waste Recycling; Anaerobic Digestion; Waste Transfer Station; Composting.



## Chapter 5

### 5.1 General

#### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 62613/4      | DO               | Hempsted Residents Association         |
| 88658/30     | DO               | Hannaford John                         |
| 88658/29     | DO               | Hannaford John                         |
| 62613/11     | DO               | Hempsted Residents Association         |
| 62613/5      | DO               | Hempsted Residents Association         |
| 65900/10     | DO               | Cotswolds AONB Partnership             |
| 61768/8      | DO               | Friends of the Earth (FoD)             |
| 66499/1      | DO               | Health and Safety Executive            |
| 62043/19     | DO               | Gloucester City Council                |
| 62043/23     | DO               | Gloucester City Council                |
| 89977/6      | DLO              | Kirby Jeff Dr                          |
| 88658/28     | DO               | Hannaford John                         |
| 88713/31     | DS               | Friends of the Earth (Gloucestershire) |
| 61998/5      | DO/W             | British Waterways                      |
| 88658/27     | DO               | Hannaford John                         |
| 88658/31     | DO               | Hannaford John                         |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

#### Summary of Objections

- (i) Sustain local distinctiveness and manage the historic landscape
- (ii) Policies needed on monitoring and evaluation
- (iii) Policies from other local plans need to be addressed in GWLP
- (iv) More clarity is needed per PPG 12 paragraphs 3.1 and 3.11
- (v) Hazardous installations and major hazard pipelines need policy guidance.
- (vi) Grounds for refusal or restraint should not be the dominant consideration.
- (vii) Primacy of statutory and regulatory requirements should be stated.
- (viii) Include a policy for sites of geological importance
- (ix) Include a policy to minimise direct and indirect health risks

#### Inspector's Reasoning and Conclusions

- 5.1.1 **Historic landscape of notable character and local distinctiveness** are material matters that are usually to be found in policies of District, Borough or City local plans. The relevant District, Borough or City local plan will form part of the Development Plan, together with the GWLP, and will be considered when planning permission for any waste development is proposed. Important areas will therefore be afforded protection in this way. RDGWLP reinforces policies on these issues in other local plans by its policies 24, 26, and by policy 27 in particular.
- 5.1.2 The RDGWLP text on **monitoring, review and enforcement** in Chapter 6 and paragraphs 5.142 to 5.148 of the Plan seem adequate without the need for additional policies. The waste hierarchy and other guidance in policy 1 (BPEO) seem to give adequate policy weighting.
- 5.1.3 I see no reason to duplicate policies in **other local plans** so long as they are taken into account in GWLP and conflicts are resolved or explained. This relies upon conflicts being identified by objections. Otherwise such conflicts will need to be resolved when planning

applications are considered but this is provided for by the guidance on precedence in PPG12 paragraphs 6.5 and 6.6. This seems adequate considering the length of the Plan period to 2012 and the evolutionary nature of policies and local plans.

- 5.1.4 Subject to other comments in my report, I do not find RDGWLP generally lacking in **clarity of policies** as suggested. Policies 8 to 19 provide helpful guidance and explanation about different aspects of waste management.
- 5.1.5 The danger presented by establishments accommodating **hazardous substances** seems to be adequately covered by paragraphs RD121 and RD 121a. However, policy 36 should logically include a reference to hazardous installations or substances.
- 5.1.6 I do not see the Plan as being a **reactive or restraining document** in a critical sense. By identifying a range of preferred sites and waste management options RDGWLP is being pro-active in achieving sustainable waste management for the County. I see the Chapter 5 policies in general as providing an appropriate framework of land-use guidance to complement site and waste management option selection in Chapter 4. Any restraint is to prevent material harm. GWLP is only one element in the waste strategy. There are other elements, such as taxation, process permission and waste collection organisation in establishing a County-wide waste management system.
- 5.1.7 I feel that it is unnecessary to state explicitly that **statutory and regulatory requirements** will take precedence over all other considerations. They are paramount considerations in assessing development, not least being section 54A of the Town and Country Planning Act 1990. RDGWLP policy 1 comprehensively covers matters that derive from EU Directives and national legislation and regulations.
- 5.1.8 I am not clear that **sites of geological importance** would be at risk without change to RDGWLP. They should certainly be afforded appropriate protection. District, Borough or City local plans should identify important geological sites and have policies for their protection. Policy 23 and paragraph 5.93 of RDGWLP seem to provide adequate protection for the purposes of this waste plan.
- 5.1.9 **Health and safety** of humans and animals is specifically safeguarded through a raft of policies. These include RDGWLP policies 1, 14, 15, 16, 17, 19, 20, 21, 24, 33 and 36. Health is also implicitly safeguarded in many other policies, such as 23. However, I feel it would be helpful to explain in policy 36 that, as set out in PPG23 paragraph 3.2, health is considered in the context of the effects on amenity that pollution would cause, and that the effects on health are specifically addressed by the licensing agency when considering whether a permit should be issued for the process and the terms and conditions of any permit.

## RECOMMENDATIONS

- 5.1.10 Policy 36 line 4 insert after “highway network”, “any hazardous installation or substance,”.
- 5.1.11 Policy 36 line 3 insert after “amenity”, “and health”.
- 5.1.12 Paragraph 5.121, after “the number of persons affected by the development and its duration;” insert “the effects on amenity that pollution would cause;”.
- 5.1.13 Paragraph 5.121, after “flood-lighting.” add, “The effects on health are specifically addressed by the licensing agency when considering whether a permit should be issued for the process and its terms and conditions.”

## 5.2 Paragraph RD5.5

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/5      | RDS              | Friends of the Earth (Gloucestershire) |
| 99020/8      | RDS              | Chaplin S M Mrs                        |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## 5.3 Policy 1 (BPEO)

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 60509/9      | DO               | Grundon (Waste) Ltd                    |
| 65393/5      | DO               | Cypher S N Mr                          |
| 65979/6      | DO               | Lafarge Redland Aggregates Ltd         |
| 62613/6      | DO               | Hempsted Residents Association         |
| 90096/16     | DLS              | Rice Phil Mr                           |
| 88658/12     | DO               | Hannaford John                         |
| 62569/2      | DO/W             | Environment Agency                     |
| 65900/1      | DS               | Cotswolds AONB Partnership             |
| 62569/35     | DS               | Environment Agency                     |
| 62043/16     | DS               | Gloucester City Council                |
| 88713/27     | DS               | Friends of the Earth (Gloucestershire) |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) What is a 'positive contribution'?
- (ii) ~~WISARD should have been used to establish BPEO and make a strategic assessment.~~
- (iii) The nature of the list of key criteria could be made more explicit.
- (iv) BPEO is a philosophical methodology not a quantitative analytical tool.
- (v) Include the regional context.

### Inspector's Reasoning and Conclusions

- 5.3.1 The nature of the **positive contribution** sought under this policy is clearly spelled out in Chapter 2 of RDGWLP (subject to the comments in my report). There, the aim of the Plan, its key objectives and guiding principles are explained. The explanation under policy 1 complements this Chapter.
- 5.3.2 I fear that more detailed explanation or elaboration of the **key criteria** for policy 1 could be counter-productive for everyone with the exception of "need". The criteria form a helpful list of factors relevant to development of waste facilities. BPEO is a complex issue, which I comment upon in various parts of my report and particularly at section 2.10. The criteria are said to be a guide for the analytical procedure to achieve the BPEO. What is the BPEO will also alter with time as technologies improve and other circumstances change. Reliable prediction of what will be sustainable in the long term is limited, which correspondingly limits the ability to establish the Plan as a whole as being "BPEO". I agree with the WPA's conclusion in WPA 36 that the Plan must go as far as it can to set out the BPEO but, that does not remove the requirement for selected sites and process options to establish BPEO for new proposals. I also accept Grundon's point that the explanation of BPEO could be clearer for policy 1 by making reference to its definition. I feel that this is best done by

cross-referring to Chapter 2 where the guiding principles of waste management development, including BPEO, are explained.

- 5.3.3 **Need** is listed as a key criterion in Table 5.1 and the WPA accepts that explanation of this factor would be helpful as it sets out in WPA 34. However, like the Government Office for the South West, I have reservations about this criterion and how it is applied as I explain further below. Nevertheless, if, contrary to the guidance in PPG23 paragraph 3.15, need is to be a material consideration in the context of regional self-sufficiency, the waste hierarchy, the proximity principle and BPEO as proposed by the WPA, I do not believe that waste sites and waste management options listed in Schedules 1 and 2 should be exempt from establishing need and BPEO just because they are in these schedules. Paragraph 4.13 of RDGWLP indicates that applications will be treated consistently. Transparency and consistency are clearly important. As I say in my report at sections 2.18 and 3.10 and at paragraph 4.15.2, the RDGWLP and assessment of present and future waste arisings have not reached the stage of their evolution where confidence in the Plan's selected sites and waste management options are such that they can automatically be considered to be the BPEO, or that a long term need has been fully established for any particular facility in the preferred location. The RDGWLP is an evolving framework requiring further refinement, although it represents the best that could be achieved to date. I am also mindful that many existing waste management facilities and sites may well not be the BPEO for the future yet potentially undermining a case of need.
- 5.3.4 Where waste management facilities are materially harmful by their nature then need for the development is an appropriate requirement to outweigh that harm and to justify the development. Alternative sites would also be considered where such conspicuous adverse effects are likely and the possibility of an alternative site lacking such drawbacks necessarily becomes a relevant consideration (*Trusthouse Forte Hotels Ltd v SSE [1986] 53 P & CR 293* and *GLC v SSE & London Docklands Development Corporation & Cablecross Projects Ltd [1985] 52 P & CR 158* as applied by the Court of Appeal in *R (on application of Jones and another) v North Warwickshire B C The Times 9<sup>th</sup> March 2001, [2001] EWCA C iv 315*).
- 5.3.5 If the WPA is right in its vision, there are increasingly likely to be occasions when waste management processes are accommodated in sites and in buildings where there is little material harm to the immediate environment such as on land allocated for industrial uses. The WPA strongly advocates improvements in waste handling, processing, transportation and construction of waste facilities. Nevertheless, even in the situation of a good quality waste facility with little impact on its immediate surroundings, harm may arise because transportation of waste would not be sustainable in that location. There could be material harm to waste policy by prejudicing self-sufficiency or the proximity principle. The BPEO would not have been achieved. On the other hand the BPEO may have been achieved but the waste is to be imported from outside the County. The proposed waste facility could be an ordinary recycling unit for example or, it could be a highly specialist unit taking waste from outside the County and even outside the region. The proposed BPEO facility may not be strictly needed by the County or region for their own internal purposes. The facility may also have an established competitor not far away so bringing need, for a further facility in that location, into question. The competitor may, or may not, have an "environmentally-friendly" facility or otherwise be the BPEO as I mention above. Provided waste plans are drafted under the guidance of RTABs with adequate provision for proximity, self sufficiency and safeguarding arrangements for sites, then the risk of waste being imported over longer distances by an excess of facilities in one area may well be deterred by transport costs.
- 5.3.6 Given the wide range of waste development possibilities, and the stage reached in waste management planning, which seems to have moved on a little from the Essex and Southend-on-Sea inquiry (CD 124), I feel that great care is required in any application of the "need" criterion. It would be inappropriate for it to be used as a means of unjustifiably isolating, or protecting, the County from waste arisings elsewhere, or for stifling waste management competition and so not achieving the BPEO for the longer term. There are waste "needs" at local, County-wide, regional and national levels. As paragraph 5 of PPG10 points out, the

needs to be satisfied by waste policies are of society, of business, of the environment and of sustainable development. “Need” is therefore a complicated matter that requires definition when used as a criterion.

- 5.3.7 I therefore do not agree with the WPA that “need”, as such, is “intrinsic” to Policy 1 as a criterion, or “central to waste management planning” in the undefined way that it is put in RDGWLP. It is the “need” for a particular facility to support sustainable waste management in its widest context that is the relevant criterion in my view, but this criterion is only applicable where there is sufficient harm as to require it. It is at this stage that it becomes part of the BPEO analysis. I therefore feel that paragraph 5.8, Table 5.1 and policies 4 to 6 should be amended so that the need criterion is correctly applied and is not misunderstood. The same goes for other policies requiring new development to be “essential” and to be “needed” by Gloucestershire.
- 5.3.8 Although the BPEO analysis is difficult and complex it is the best we have got at present and is an improvement on what has gone before. No alternative is proposed. I therefore see no need to alter this policy. The analysis should cover the potential of a waste proposal to stifle regeneration of an area or locality, a concern of Gloucester City and Forest of Dean District Councils in particular.
- 5.3.9 The regional application of BPEO is not precluded or prejudiced by policy 1 or its explanation. Policy 2 is the appropriate policy to address the regional context of BPEO and I comment on this at section 5.7 of my report.

## RECOMMENDATIONS

- 5.3.10 Paragraph 5.6: add after “Structure Plan” “and is explained under the Guiding Principles in Chapter 2 of this Plan”.
- 5.3.11 Paragraph 5.8: delete the paragraph from “The assessment of need is central to waste management planning.....” and substitute the following 2 paragraphs;  
 “Where waste development is materially harmful in terms of policy or environmental impact, the need for the development must be established to outweigh that harm and justify the development. However, establishment of need will not prejudice the achievement of the BPEO for new waste facilities required to service the arisings of the County, the Region or the wider national community. This is because the Plan takes forward the national strategy to achieve the most sustainable network of waste facilities that is practicable throughout the country. Because Gloucestershire adjoins 4 regions, the County is vulnerable to importing waste arisings from outside its own region. Although this is contrary to the principle of regional self-sufficiency it may be sustainable. So, where waste is likely to be imported, proposals will be carefully scrutinised to ensure that they are the BPEO for the facility and location in question.”
- “To demonstrate sustainability the BPEO analysis must show that the proposed waste facility takes full account of the guiding principles of regional self-sufficiency, the proximity principle and the waste hierarchy. Such an analysis would include an assessment of future waste arisings for the facility proposed and its waste stream (ie “need”) and a comparison with other potentially suitable sites and facilities in the likely catchment area for the waste in question. This analysis will be required of all new sites and facilities although the amount of detail appropriate will depend on the size, type and location of the proposed facility (see paragraph 5.11 below). Preferred Sites in Schedules 1 and 2 of the Plan have the advantage of having had some scrutiny during the local plan process but, as paragraph 4.13 of the Plan points out, that is not conclusive of development proposals being approved.”
- 5.3.10 Amend Table 5.1 Detail column for Need to read, “If facility would be materially harmful, a waste management need must be satisfied.”
- 5.3.11 Amend policies 4, 5 and 6 as set out in my report below.

## 5.4 Paragraph 5.7

### Comments

| Comments No. | Status (See Key) | Name                       |
|--------------|------------------|----------------------------|
| 61768/9      | DO               | Friends of the Earth (FoD) |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) Indicate specific waste management usage for each location (61768/9)

### Inspector's Reasoning and Conclusions

- 5.4.1 As I have commented elsewhere in my report (eg sections 2.18, 3.10 and 5.3) the GWLP has not reached the stage when it is able, or it is appropriate, to fully specify precise details of all future waste facilities by location. See for example CD09 paragraph 3.88 on the lack of information on special wastes. Furthermore, the prescriptive approach advocated by FED does not sit comfortably with the freedoms in our land holding system and commercial practice. The safeguard for the public and interested groups and persons in terms of consultation is that comments and objections can be made and considered during the local plan process (as has happened) and again when a planning application is submitted. I accept that RDGWLP has shortcomings in site selection, data collection and prediction. However, I do not believe the GWLP, which is no more than a framework and guide for detailed proposals, can go further than it has at this stage and I am confident that clarity will be better in future versions of the Plan.
- 5.4.2 For these reasons I do not accept the contentions of FED that the GWLP is not BPEO and so its progress to adoption should be postponed until it is refined further. Despite the Plan's shortcomings it has a great deal of merit and I believe that the WPA has done its best in the time available as it sets out in WPA36 and been commended for it in WPA12a. The Plan also has the safeguard of requiring waste development options in Schedules 1 and 2 to confirm themselves as being the BPEO before planning permission is granted. Sites not in the Plan can be brought forward if demonstrated to be the best option. As part of this exercise the WPA is also seeking the Environmentally Superior Technology Option (CD131). I do not therefore accept that the Plan is fatally flawed. My comments and recommendations seek to overcome many of the shortcomings, some of which are caused by matters outside the WPA's control.

### RECOMMENDATIONS

- 5.4.3 No change to paragraph 5.7 of the Plan as a result of this objection.

## 5.5 Paragraph 5.9

### Comments

| Comments No. | Status (See Key) | Name                                 |
|--------------|------------------|--------------------------------------|
| 62009/3      | DO/W             | Government Office for the South West |
| 61775/5      | RDO              | Prestbury Parish Council             |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

- (i) Demonstration of need for a development is questioned.
- (ii) ~~The level of detail for a BPEO assessment depends on the size and scale of the proposal~~
- (iii) A full environmental and traffic assessment should be required.

## Inspector's Reasoning and Conclusions

5.5.1 I address the subject of need in section 5.3 above.

5.5.2 I find no grounds for making special provision for Gloucestershire for environmental and transport assessment. RDGWLP policies 1 (with Table 5.1) and 39 address these aspects of waste development, requiring environmental and traffic assessment appropriate to circumstances. I comment upon EIA at section 4.10 of my report.

## RECOMMENDATION

5.5.3 No change to paragraph 5.9 as a result of these objections.

## 5.6 Table No 5.1

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/28     | DO               | Friends of the Earth (Gloucestershire) |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

- (i) Incomplete reference to environmental impacts

## Inspector's Reasoning and Conclusions

5.6.1 BPEO analysis using Table 5.1 as a guide will be a very comprehensive exercise. Global considerations are embodied in the guidance note in the Detail column. Health impacts and the implications for waste arisings are key factors required to be addressed also in the guidance on detail. I therefore see no need to amend the table on this count.

## RECOMMENDATION

5.6.2 No change to Table 5.1 other than amendments recommended elsewhere in my report.

## 5.7 Policy 2 (Regional Self Sufficiency)

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 62063/9      | DO               | Swindon Borough Council                |
| 88713/30     | DO/W             | Friends of the Earth (Gloucestershire) |
| 88713/29     | DS               | Friends of the Earth (Gloucestershire) |
| 62569/36     | DS               | Environment Agency                     |
| 62043/17     | DS               | Gloucester City Council                |
| 88658/13     | DO               | Hannaford John                         |
| 90096/27     | DLO              | Rice Phil Mr                           |

## Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/32     | DO               | Friends of the Earth (Gloucestershire) |
| 62005/8      | RDO              | Countryside Agency                     |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

- (i) Long distance transfers should only be acceptable in very limited circumstances
- (ii) Encourage markets for recycled materials and new facilities to promote regional self-sufficiency.

## Inspector's Reasoning and Conclusions

- 5.10.1 I do not agree that a limitation should be put on long distance transfers if waste management is to be sustainable. Paragraph 5.14 and RD 5.14 explain proximity quite well. Strategic facilities, by their nature, are catering for a wider catchment area, as is the case for specialist facilities to which I refer in section 5.3 of my report. This merits minor amendment to paragraph 5.14 of the Plan.
- 5.10.2 I agree with the WPA that encouragement of markets for recycled materials is not a land-use issue to be dealt with in this Plan although locating waste recycling facilities near plants that can re-use recycled materials, such as industrial complexes, could be helpful in terms of sustainability. However, I do not have the evidence to be able to form a clear conclusion and make any recommendation on the point in land-use terms.

## RECOMMENDATION

- 5.10.3 Paragraph 5.14 line 6, after "to" insert ", for example,".

## 5.11 Paragraph RD5.14

## Comments

| Comments No. | Status (See Key) | Name               |
|--------------|------------------|--------------------|
| 62005/9      | RDO              | Countryside Agency |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

- (i) Amend to place the environment before profit.

## Inspector's Reasoning and Conclusions

- 5.11.1 There is potential confusion in the words "cost" and "benefit". As the WPA says they refer to environmental and not financial effects. The text could be less ambiguous if amended.

## RECOMMENDATION

- 5.11.2 Amend the second sentence of paragraph RD 5.14 of the Plan to read "Where the BPEO for a waste stream is towards the lower end of the waste hierarchy, this can often be because the environmental impact, including that from transportation, to a



distant reprocessing facility or market outweighs the environmental benefit of recovering the waste.”

## 5.12 Policy 4 (Strategic Sites)

### Comments

*For list of objectors and supporters see Appendix 1: Figure 8*

### Summary of Objections

*Objections relating to :*

#### *Initial Deposit*

- (i) To exclusion of Myers Road
- (ii) To inclusion of Gloucester Business Park
- (iii) To inclusion of Hucclecote
- (iv) To inclusion of Moreton Valance Airfield
- (v) To inclusion of Sharpness
- (vi) Incineration
- (vii) Abandon plans for incineration and spend the money on recycling
- (viii) List of planning obligation matters is too extensive
- (ix) Site profiles for Gloucestershire Business Park and Sharpness Docks fail to identify significant national and international designated sites as constraints on development.
- ~~(x) Paragraph 5.17 would make a better introduction to the policy~~
- (xi) Applicants should not have to establish that sites included within Schedule 1 are unavailable
- (xii) The term 'strategic' could be mistaken to mean regional.
- (xiii) The majority of sites should be deleted
- (xiv) The policy treats all strategic waste management facilities as if they have an identical environmental impact
- (xv) The policy should not contain any presumption in favour of granting permits
- (xvi) The presumption to permit is dangerous
- (xvii) A site may simply be necessary despite the availability/ identification of others
- (xviii) BPEO for Gloucester may be to reject all these sites
- (xix) Highway Agency object to Sites 1,2,3 and 5 and Policies 4 and 5
- (xx) There is no site in the Forest of Dean area
- (xxi) No provision has been made for facilities in the south east of the county
- (xxii) Waste disposal and processing sites should not be located on land subject to flooding

#### *Revised Deposit*

- (i) Object to deletion of Sharpness
- ~~(ii) Withdraw the third bullet point.~~
- ~~(iii) Reference to providing for waste arising in Gloucestershire should also include the region~~
- (iv) The policy continues to refer to identified sites as allocations
- ~~(v) There is no site identified in the Forest of Dean area.~~
- (vi) Revisiting to see how policy will work in practice and how unnecessary planning blight can be avoided
- (vii) No provision has been made for facilities in the south east of the county
- (viii) The distribution of preferred sites is still considered inadequate

### Inspector's Reasoning and Conclusions

- 5.12.1 **Objections to certain sites** in this policy and the Plan, including omissions, have been addressed at sections 4.16 to 4.51 and section 3.10 of my report. The same is the case for objections to incineration and other waste management methods (sections 4.1 to 4.9).

- 5.12.2 **Prioritisation of waste management methods to achieve sustainability** is set out in Chapter 2 of the Plan. Please refer to sections 2.6, 2.8 and 2.10 of my report for example.
- 5.12.3 I deal with **planning obligations** under policy 44 at section 5.81 of my report. Circular 1/97 (Planning Obligations) advises (at paragraph B20) that where there is a choice between imposing conditions and entering into a planning obligation, the imposition of a condition which satisfies the tests of Circular 11/95 is preferable.
- 5.12.4 I have addressed the term **“strategic”** at section 4.10 of my report. I see some Schedule 1 sites having potential for a regional role in a sustainable waste management system (for example see section 4.26 of my report), but the definitive assessment awaits the deliberations of the RTAB's. Please see also sections 2.15 and 5.3 of my report on the application of the proximity principle.
- 5.12.5 Because all new sites and facilities need to comply with policies in the Development Plan under GWLP policy 4, they will need to demonstrate that they are the BPEO under GWLP policy 1. The **environmental impact** of all new strategic facilities, including on **health**, will therefore be assessed in detail (please see section 5.1 of my report). There is an **open-minded approach** because the application procedure will involve the usual consultation. The Environmental Impact Assessment Regulations 1999 lay down the requirements for an **Environmental Assessment** (section 4.10 of my report). GWLP policy 39 provides for **Transport Assessment** (section 5.77 of my report) and policies 33 and 34 regulate **water pollution and flood risk** (section 5.60-61 of my report).
- 5.12.6 I have addressed **planning blight** at section 4.15 of my report.
- 5.12.7 **The relationship between sites in Schedule 1 and those excluded** is not satisfactory in my view. As I have explained at various parts of my report, for example at sections 2.18, 3.10 and at paragraph 5.3.3, the Plan is not at the stage where I feel the WPA can be confident that it has the best potential range of sites in Schedule 1 or Schedule 2 for the County or the Region. The Plan is at a relatively early stage of evolution, and the RTAB has not yet published its guidance, so there is likely to be significant refinement of the Plan when it is reviewed and updated. That being the case, it would be unreasonable at this stage to place a higher burden upon applicants for sites not listed in the Plan than those listed. I therefore support the objections on these points.
- 5.12.8 Those sites listed in the schedules as showing good potential already have a head start on sites not included in the Plan as they have had some scrutiny and appraisal in the local plan process. However, the aim is to get the best option and I believe it possible that some good, and perhaps better, sites than those listed may not yet be in the Plan. I therefore feel that the policy should be amended to remove this discrimination. BPEO under policy 1 provides a good safeguard on the appropriateness of location and waste management method. Reference to Schedule 1 should therefore be made as a provisional benchmark or illustration, but listing the sites as if they have a higher status than any other is, I believe, going too far.
- 5.12.9 I recommend that this policy be amended on the subject of **Need** as per section 5.3 of my report. Where the new development is on a strategic scale, the environmental effects are likely to be of an order to trigger the need criterion, but that “need” may not be appropriately confined to the County as I have already explained. Because all the GWLP's policies need to be read together and combine to make a complementary whole, policy 4 should not need more than the key points applicable to strategic sites and facilities.

## RECOMMENDATION

- 5.12.10 Delete the text of policy 4 and substitute, “Strategic waste management facilities, such as those illustrated in Schedule 1 of the Plan as having potential and as defined in paragraph 4.5, will be permitted where it can be demonstrated:

- That the facility is essential to support sustainable waste management in, or on behalf of, Gloucestershire; and
- That the facility meets the relevant policies and criteria of this and other parts of the Development Plan.”

### 5.13 Policy 5 (Non-Strategic Sites)

#### Comments

*For a list of objectors and supporters see Appendix 1: Figure 9*

#### Summary of Objections

##### *Initial deposit*

- (i) To inclusion of Phoenix House
- (ii) To inclusion of land to the rear of Dowty
- (iii) To inclusion of Cinderford
- (iv) To inclusion of Lydney
- (v) To inclusion of Horton Road
- (vi) The need for transfer stations in the central locations in Stroud and Cotswold has not been reflected in the list.
- (vii) What is a 'positive contribution'
- (viii) Define the two tier classification of EfW plants and scrap yards
- (ix) Identified sites need to be deemed unsuitable if windfall sites come forward.
- (x) Half the identified sites are situated in Gloucester.
- (xi) District Councils need to provide adequate secondary waste facilities in their own areas.
- (xii) Highway Agency object to Sites 1,2,3 and 5 and Policies 4 and 5 unless there will be consultation on applications.
- (xiii) Sudmeadow Road, Phelps Bros. should be added to the list.
- (xiv) This policy should facilitate any sustainable site.
- (xv) Flood risk is not acceptable.
- (xvi) No provision has been made for facilities in the south east of the county

##### *Revised Deposit*

- (i) To inclusion of Gloucester Business Park
- (ii) To inclusion & to exclusion of Sharpness
- (iii) To inclusion of Wingmoor Farm
- (iv) To inclusion of Lydney
- (v) Need is only applicable to specially protected areas.
- (vi) BPEO could justify regional waste arisings.
- (vii) BPEO requirements mean getting the best site
- (viii) Schedule 2 facilities should be limited to 50,000 tonnes per year.
- (ix) Sites 1,2,3 and 5 (RD18, 19 and 22) need consultation with the Highways Agency.
- (x) Insufficient provision has been made for facilities in the south east of the county.
- (xi) The distribution of preferred sites is inadequate

#### Inspector's Reasoning and Conclusions

5.13.1 My conclusions on policy 5 very much echo those on policy 4.

5.13.2 Objections to certain sites in this policy and the Plan, including omissions and distribution, have been addressed at sections 4.16 to 4.51 and section 3.10 of my report. The same is the case for objections to incineration and other waste management methods (sections 4.1 to 4.9).

- 5.13.3 **Prioritisation of waste management methods to achieve sustainability** is set out in Chapter 2 of the Plan. Please refer to sections 2.6, 2.8 and 2.10 of my report for example. There does not appear to be a "2 tier system" of classification by waste management method as evidenced by the Phoenix House incinerator.
- 5.12.11 I have addressed the **regional dimension** and the **capacity of sites** at section 4.10 of my report. I do not see Schedule 2 sites generally having more than a local catchment of waste arisings, unless of a specialist nature, because of their capacity but, in a sustainable waste management system, that could mean waste crossing administrative boundaries to achieve BPEO, a point I explain at section 3.10 of my report. This could involve import or export. Please see also sections 2.15 and 5.3 of my report on the application of the proximity principle.
- 5.13.4 Please see sections 5.3 and 5.12 of my report on the subject of **need** and **the relationship of sites in Schedule 2 of the Plan and those that are not**. Schedule 2 facilities, particularly if they are located on industrial (Class B2) land and are of good environmental standard, may not require "need" to be shown. I do not believe that the RDGWLP is yet at a stage when sites not in the Plan are, in effect, discriminated against by having to shoulder a much higher burden of evidence as a matter of policy. The key point for policy 5 seems to be to give effect to the smaller scale waste management facilities in a way that optimises sustainability without sustainability being prejudiced artificially by administrative boundaries or a lack of need due to poor quality waste facilities. Pyke Quarry, Horsely is cited by Horsely Parish Council (under policy 6) as an example of an old site that is unlikely to be the BPEO for its waste streams in an area where sustainable facilities are needed. I am unable to comment on this other than to say that BPEO under policy 1 provides a good safeguard on the appropriateness of location and waste management method. Like policy 4, reference to Schedule 2 should therefore be made as a provisional benchmark or illustration, but listing the sites as if they have a higher status than any other is, I believe, going too far at this stage.
- 5.13.5 I agree that **co-operation between the WPA and District, Borough and City Councils** is of great importance to achieve optimum sustainability. I address this at paragraph P1.1.6 of my report. I do not feel that it merits an amendment to this policy.
- 5.13.6 GWLP policy 39 provides for **Transport Assessment** (section 5.77 of my report) including consultation with the Highways Agency, and policies 33 and 34 regulate **water pollution and flood risk**.

## RECOMMENDATION

- 5.13.7 Delete the text of policy 5 and substitute, "Waste management facilities on sites designed to process less than 50,000 tonnes per annum, such as those illustrated in Schedule 2 of the Plan as having potential and as defined in paragraph 4.5, will be permitted where it can be demonstrated:
- That the facility will support sustainable waste management in, or on behalf of, Gloucestershire; and
  - That the facility meets the relevant policies and criteria of this and other parts of the Development Plan."

## 5.14 Paragraph 5.19

### Comments

| Comments No. | Status (See Key) | Name                |
|--------------|------------------|---------------------|
| 89808/4      | DO/W             | Robert Hitchins Ltd |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

\*—The plan does not define 'small-scale'

### 5.15 Paragraph 5.20

#### Comments

| Comments No. | Status (See Key) | Name                |
|--------------|------------------|---------------------|
| 89808/3      | DO               | Robert Hitchins Ltd |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

- (i) Delete first sentence – such sites should not have the support of the WPA until the plan has been formally adopted.

## Inspector's Reasoning and Conclusions

5.15.1 The RDGWLP is drafted with a view to adoption so I do not feel that the statement of the WPA's support for the Schedule 2 sites in principle needs amendment. Subject to the comments in my report, they seem to be the best sites we know about at present.

## RECOMMENDATION

5.15.2 No change to paragraph 5.20 of the Plan as a result of this objection.

### 5.16 Policy 6 (Alternative Sites)

#### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/35     | DS               | Friends of the Earth (Gloucestershire) |
| 61857/1      | DS               | Horsley Parish Council                 |
| 62040/4      | DO               | Forest of Dean District Council        |
| 88797/18     | RDO              | Federal Mogul Corporation              |
| 62542/1      | RDO              | Environmental Services Assoc.          |
| 88713/11     | RDS              | Friends of the Earth (Gloucestershire) |
| 88713/8      | RDS              | Friends of the Earth (Gloucestershire) |
| 90096/18     | DLS              | Rice Phil Mr                           |
| 90241/2      | DLO              | Brookes A Mr & Mrs                     |
| 88658/17     | DO               | Hannaford John                         |
| 62542/6      | DO               | Environmental Services Assoc.          |
| 62048/1      | DO               | South Gloucestershire Council          |
| 61775/11     | DO               | Prestbury Parish Council               |
| 62043/12     | RDO              | Gloucester City Council                |
| 98640/18     | RDO              | Trustees of W. J Liddington (Deceased) |
| 62043/21     | DO               | Gloucester City Council                |
| 88662/9      | DO               | Phelps Bros                            |
| 88678/1      | DO               | Tufnell Town & Country Planning        |
| 89364/3      | DO               | Duncliffe P E                          |

|         |    |                     |
|---------|----|---------------------|
| 89808/1 | DO | Robert Hitchins Ltd |
|---------|----|---------------------|

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

- (i) The definition of 'industrial land' should only include land allocated for this in an adopted plan

## Inspector's Reasoning and Conclusions

5.18.1 The important factor here is to locate waste management facilities on suitable sites. Industrial land will often be appropriate although Class B1 uses and good quality development, as in section 4.30 of my report, can limit the options available. The industrial land may, or may not, be formally allocated as such in the District Local Plan so the proposal seems over restrictive. Plans also take some time to progress to adoption. I therefore see no sound reason to amend the Plan on this count.

## RECOMMENDATION

5.18.2 No change to the Plan as a result of this objection.

## 5.19 Policy 7 (Safeguarding)

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/36     | DS               | Friends of the Earth (Gloucestershire) |
| 88662/10     | DO               | Phelps Bros                            |
| 65979/9      | DO               | Lafarge Redland Aggregates Ltd         |
| 62043/13     | RDO              | Gloucester City Council                |
| 98640/19     | RDO              | Trustees of W. J Liddington (Deceased) |
| 88797/19     | RDO              | Federal Mogul Corporation              |
| 88662/1      | RDO              | Phelps Bros                            |
| 90096/19     | DLS              | Rice Phil Mr                           |
| 89814/3      | DO               | Porsche Club Great Britain             |
| 62043/22     | DO               | Gloucester City Council                |
| 89826/3      | DO               | NMB Group Plc                          |
| 62040/5      | DO               | Forest of Dean District Council        |
| 62569/23     | DO/W             | Environment Agency                     |
| 66201/2      | DO               | Packwood Estates Limited               |
| 88744/3      | DO/W             | Howard Tenens Associates Ltd           |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

### Initial Deposit

- (i) ——— Cross reference to Appendix 5  
(ii) This policy is unnecessary if waste sites are properly allocated.  
(iii) The policy will do little to assist councils move "bad neighbour" uses to better sites  
~~(iv) ——— Land is held in abeyance unjustly~~  
(v) Have regard to future potentially suitable sites.  
(vi) The Cotswold Business Park would be blighted.  
(vii) Omit 'within or' in the fifth line

*Revised Deposit*

- (i) Include exceptions to the main objective e.g. non-viability, cessation, abandonment of use
- (ii) The policy is over-restrictive on the potential development of waste management facilities

**Inspector's Reasoning and Conclusions**

- 5.19.1 I agree with the WPA that this safeguarding provision is essential to ensure that a range of waste facilities is available in potentially suitable locations. The sites selected are the best we can do for the time being as "making a contribution to a sustainable waste management system in accordance with BPEO for Gloucestershire". Sites have been scrutinised in the local plan process to resolve conflicts. Existing "bad neighbour" sites would not be protected if they were not BPEO. Paragraph 33 of PPG10 suggests that safeguarding is considered to secure a sustainable waste management system. It is very apparent to me that there is a significant prejudice against waste facilities by many landowners, members of the public and some authorities. To some extent this is understandable because of some poorly managed and located waste enterprises, the dirty, noisy and potentially hazardous nature of some waste, and a lack of confidence that the burden of dealing with waste will be shared in a fair way. However, environmental, construction and management standards and waste planning are improving and are likely to improve further. Also, suitable sites to achieve the BPEO are scarce. Development within and in close proximity to the preferred sites could inhibit future waste development.
- 5.19.2 Potential waste sites are also likely to be used for other more lucrative uses if safeguarding is not applied. I therefore believe unreservedly that this policy, and its firm, but measured, implementation, are necessary in the public interest even though the policy will be unpopular in some quarters. The support of local planning authorities in protecting sites with good potential is essential if waste is to be planned in a sustainable way. However, this also requires preferred waste sites in the GWLP to be limited and not excessive so that appropriate non-waste development is not unreasonably obstructed or delayed.
- 5.19.3 The policy gives discretion to the WPA to oppose development of preferred waste sites so the policy is unlikely to be over-restrictive on waste or too onerous. As new facilities are developed and inappropriate sites and facilities are unable to develop because they are not BPEO, then a more sustainable network of sites should come into being. However, it will take time.
- 5.19.4 On other sites with good potential please see my comments at sections 5.12, 5.13 and 5.16 of my report. On blight and sterilisation please see section 4.15 of my report and section 4.31 for the Cotswold Business Park. Section 5.3 of my report relates to regeneration. The WPA's suggested clarification of the consultative purpose of policy 7 in paragraph 5.30 of the Plan seems helpful (WPA31a).

**RECOMMENDATIONS**

- 5.19.5 No change to Policy 7 as a result of these objections.
- 5.19.6 Add to the end of paragraph 5.30, "In safeguarding such sites the waste planning authority's objective is to ensure proper consultation from, and consideration by, the determining local planning authority."

**5.20 Paragraph 5.31**

**Comments**

| Comments No. | Status (See Key) | Name                           |
|--------------|------------------|--------------------------------|
| 65979/10     | DS               | Lafarge Redland Aggregates Ltd |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

- (i) How will this requirement be policed in terms of districts consulting on applications?

## Inspector's Reasoning and Conclusions

5.20.1 The GWLP forms part of the Development Plan for Gloucestershire. All planning applications are required by section 54A of the Town and Country Planning Act 1990 to be determined in accordance with the Development Plan unless material considerations indicate otherwise. All local planning authorities in the County will therefore apply the GWLP policy 7 to any development on, or near, a Schedule 1 or 2 waste site according to the legislation.

## RECOMMENDATION

5.20.2 No change to the Plan as a result of this comment.

## 5.21 Paragraph RD5.32

### Comments

| Comments No. | Status (See Key) | Name               |
|--------------|------------------|--------------------|
| 62005/11     | RDS              | Countryside Agency |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## 5.22 Paragraph RD5.32a

### Comments

| Comments No. | Status (See Key) | Name               |
|--------------|------------------|--------------------|
| 62005/12     | RDO              | Countryside Agency |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

- (i) Insert 'make it viable for a new use' after 'enhance its recovery.'

## Inspector's Reasoning and Conclusions

5.22.1 I do not see a problem with adding the criterion suggested by the Countryside Agency even if it is not stated in the Government guidance. It would seem to improve the Plan. If treatment makes the waste viable for a new use then that would appear to achieve the object of recovery.

## RECOMMENDATION

5.22.2 Add to the end of paragraph RD 5.32a, " , or  
- make it viable for a new use."



## 5.23 Policy 8 (Anaerobic Digestion)

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/42     | DO/W             | Friends of the Earth (Gloucestershire) |
| 97779/4      | RDS              | ETSU                                   |
| 61775/7      | RDO              | Prestbury Parish Council               |
| 88713/12     | RDS              | Friends of the Earth (Gloucestershire) |
| 62005/13     | RDO              | Countryside Agency                     |
| 90096/20     | DLS              | Rice Phil Mr                           |
| 62569/38     | DS               | Environment Agency                     |
| 88756/7      | DO               | Living Green Centre                    |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

#### Initial Deposit

- (i) ~~'Significant' is not consistent with the tests applied to other waste to energy technologies in Policy 14~~
- (ii) Water resource management and surface/groundwater recharge should be the aim
- (iii) Encourage alternatives to conventional semi-industrial processing in anaerobic digesters

#### Revised Deposit

- (i) After 'locations' add 'according to the application of the guiding principles especially the BPEO.'
- (ii) Reinstate the requirement to make a significant contribution to a sustainable waste management system for Gloucestershire.

### Inspector's Reasoning and Conclusions

- 5.23.1 Policies 33 and 34 deal with water pollution and flooding in relation to waste development. Other local plans and the Structure Plan are the appropriate documents to promote water resource management and surface/groundwater recharge from a land-use planning viewpoint.
- 5.23.2 Reed bed systems as advocated by the Living Green Centre seem to merit consideration and the WPA accepts the point in principle. This point could be usefully added to the explanation at the end of this policy section.
- 5.23.3 Addition of the requirements to accord with BPEO and sustainable waste management are unnecessary in this policy because they are required by policies 1, 4, 5 and 6 of the Plan and section 54A of the Town and Country Planning Act 1990.

### RECOMMENDATION

- 5.23.4 Add to the end of paragraph 5.34 of the Plan, "Reed bed systems may merit consideration in appropriate circumstances."

## 5.24 Policy 9 (Composting)

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/37     | DS               | Friends of the Earth (Gloucestershire) |
| 88658/18     | DO               | Hannaford John                         |
| 90096/21     | DLS              | Rice Phil Mr                           |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) Illegible objection (Respondent contacted for clarification)

### Inspector's Reasoning and Conclusions

- 5.24.1 I regret that I am unable to comment on Mr Hannaford's objection as no legible version has been submitted.

### RECOMMENDATION

- 5.24.2 No change to Policy 9 as a result of this objection.

## 5.25 Paragraph 5.35

### Comments

| Comments No. | Status (See Key) | Name                          |
|--------------|------------------|-------------------------------|
| 62637/8      | DO/W             | Cory Environmental (Glos) Ltd |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- \*—Include Policy 4 on the second line of the section so that it is consistent with schedule 1 on page 41

## 5.26 Policy 10 (Household Waste Recycling)

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/38     | DS               | Friends of the Earth (Gloucestershire) |
| 61857/2      | DS               | Horsley Parish Council                 |
| 61891/4      | DO               | Stinchcombe Parish Council             |
| 89724/2      | DO               | Menelaws A N Miss                      |
| 62758/1      | DS               | Fearnley P Mrs                         |
| 90096/22     | DLS              | Rice Phil Mr                           |
| 88658/19     | DO               | Hannaford John                         |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

- (i) Objection to closure of Horsley when its lease runs out.
- (ii) Garden waste could not be collected on a door to door basis
- (iii) Closure of Horsley would mean extensive dumping of waste material at the roadside

## Inspector's Reasoning and Conclusions

- 5.26.1 It is expected that waste authorities will reflect the policies in the GWLP in their contractual dealings with waste operators. The Plan aims to enhance the sustainability of waste management by promoting sites that are BPEO for the waste stream concerned. Policy 10 seeks to implement this together with other policies in the Plan. I too question the adequacy of facilities in the Dursley/Cam/Wotton-under Edge/Stroud area (please see section 3.10 of my report). I do not agree with the implication of the WPA's response to objections that provision of household waste recycling centres is a matter for waste contracts but I note the uncertainty of the future of the facility at Horsley (WPA31). I see these facilities featuring as planning requirements in this Plan. Indeed Schedules 1 and 2 of the Plan have such facilities for certain sites. I believe there should be a more comprehensive distribution of these centres and this seems to be acknowledged in paragraph 5.42 of the Plan. Hence I have recommended a review in section 3.10 of my report.
- 5.26.2 I agree that accessibility and transport availability are important factors to achieve sustainability and prevent dumping. This indicates a need for a good waste collection organisation as I suggest at paragraphs P1.1.5 to P1.1.7 of my report.

## RECOMMENDATIONS

- 5.26.3 No change to policy 10 as a result of these objections.
- 5.26.4 Add to the end of paragraph 5.42 of the Plan, “, and the future of one at Horsley is uncertain.”

## 5.27 Paragraph 5.42

### Comments

| Comments No. | Status (See Key) | Name                 |
|--------------|------------------|----------------------|
| 61850/3      | DO/W             | Dursley Town Council |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

- (i) ~~All measures to retain the facility at Horsley should be taken and if it is not, a new site should be created in the south of the vale so that if necessary there are two sites in the Stroud district.~~

## 5.28 Policy 11 (Inert Recovery & Recycling)

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/39     | DS               | Friends of the Earth (Gloucestershire) |
| 90096/23     | DLS              | Rice Phil Mr                           |
| 88658/20     | DO               | Hannaford John                         |
| 62009/8      | DO               | Government Office for the South West   |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

- (i) Reference to 'Controlling the Environmental Effects of Recycled and secondary Aggregates Production' (DETR) published in February

## Inspector's Reasoning and Conclusions

- 5.28.1 This objection has been resolved in RDGWLP.
- 5.28.2 Unfortunately Mr Hannaford's objection is illegible.

## RECOMMENDATION

- 5.28.3 No change to the Plan as a result of these objections.

## 5.29 Paragraph 5.45

### Comments

| Comments No. | Status (See Key) | Name                |
|--------------|------------------|---------------------|
| 88756/6      | DO               | Living Green Centre |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

- (i) Household/small scale construction and building works should be geared to recycling.

## Inspector's Reasoning and Conclusions

- 5.29.1 Policy 35 of RDGWLP focuses on waste minimisation for all types of development. This seems to cover the objection by implementing the sound suggestion made.

## RECOMMENDATION

- 5.29.2 No change to the Plan as a result of this objection.

## 5.30 Policy 12 (Materials Recovery & Waste Transfer)

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/40     | DS               | Friends of the Earth (Gloucestershire) |
| 88662/11     | DO               | Phelps Bros                            |
| 90096/24     | DLS              | Rice Phil Mr                           |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support  
D= Deposit; R= Revised Deposit

## Summary of Objections

- (i) Omit 'appropriate' and insert the words 'identified in Policies 4,5 and 6 and other appropriate locations.'

## Inspector's Reasoning and Conclusions

- 5.30.1 As all the policies of the Plan are to be read together as a complementary whole, and policies 4 to 6 do not conflict with policy 12, I see no need to insert the words suggested.

## RECOMMENDATION

- 5.30.2 No change to the Plan as a result of this objection.

## 5.31 Policy 13 (Scrapyards/Metals Recycling)

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/41     | DS               | Friends of the Earth (Gloucestershire) |
| 62046/2      | RDO              | Cheltenham Borough Council             |
| 90096/25     | DLS              | Rice Phil Mr                           |
| 88662/12     | DO               | Phelps Bros                            |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

- (i) The policy is superfluous, negative vague and badly worded.  
(ii) Clarify the distinction between scrap yards and metal recovery

## Inspector's Reasoning and Conclusions

- 5.31.1 I see policy 13 as amplifying earlier policies for development involving metals recycling and recovery. It does so by adding emphasis to the need for new facilities to be strictly controlled. This is because, as paragraph 5.54 indicates, many existing metals recycling facilities are outside industrial areas, and are open, causing a high environmental impact. Some may not be the BPEO for expansion or any other new waste management development. Although the policy does overlap with policies 4 to 6, I feel that it adds to these policies sufficiently to be helpful and should be retained.
- 5.31.2 I agree with the WPA that the term "scrapyard" should be replaced by metals recycling facility. Please see section 4.6 of my report.

## RECOMMENDATION

- 5.31.3 Implement recommendation 4.6.4.

## 5.32 Policy 14 (Waste to Energy Recovery)

### Comments

For a list of objectors and supporters see Appendix 1: Figure 10

## Summary of Objections

- (i) Objections relating to sites at Sharpness
- (ii) Recycling and composting are more beneficial than incineration.
- (iii) The need for waste to energy to provide for maximum front-end materials recovery and to minimise the negative impacts on materials recovery more widely are omitted.
- (iv) Omits the need for proposals to ensure the use of both electricity and heat from the process
- (v) Commitment is required to minimise the risk of harm to human health and wildlife.
- (vi) Environmental effects and safety are unproven.

## Inspector's Reasoning and Conclusions

- 5.32.1 I have addressed the objections to the sites at Sharpness at sections 4.26 and 4.51 of my report.
- 5.32.2 I have addressed the objections to incineration and waste to energy technology at sections 4.7 and 4.9 of my report. FEG proposes that policy 14 requires application of best value targets for recycling as a pre-requisite; no conflict with future recycling; economic heat and power recovery; and identification of safe and secure disposal routes for all residues (FEG/W/3). In principle these seem sensible and would be considered in the BPEO analysis. It seems to me that criteria along these lines would be helpful to the public, developers and the WPA except that it would be unduly inhibiting for the Plan to restrict these plants to places where combined heat and power can be economically realised. BPEO analysis will resolve this issue as there may in the future be substantial energy recovery benefits from other than combined heat and power.
- 5.32.3 I agree that recycling and composting are, in principle, more beneficial than incineration in the sense that they are higher in the waste hierarchy as set out in Chapter 2 of RDGWLP. However, achievement of the most sustainable waste management system is more complex than this factor alone, so incineration, and many other waste management methods, still need to be considered. A policy is therefore helpful for incineration and other waste to energy technologies.
- 5.32.4 Preference for recovery of energy from these plants is stated in paragraph 5.58 echoing Chapter 2 of the Plan and specifically Figure 2.1. It seems worth putting in this policy too.
- 5.32.5 I am not clear that waste to energy needs to provide for maximum front-end materials recovery. Paragraph 5.58 of RDGWLP seems to explain this effectively. The BPEO analysis under policy 1 should ascertain whether there are negative impacts on materials recovery, as should the amendment to this policy proposed by FEG.
- 5.32.6 As I suggest at section 5.3 of my report, the use of "essential" and "to satisfy Gloucestershire's need" is inappropriate if waste management is to be truly sustainable.

## RECOMMENDATION

- 5.32.7 Delete Policy 14 and substitute; "Proposals for the development of waste to energy recovery facilities will be permitted in appropriate locations where it can be demonstrated that;
- the facility would be a part of a sustainable waste management system; and
  - in demonstrating sustainability the facility would not prejudice best value targets being met for recycling; it would realise energy recovery; and disposal routes for residues would be satisfactory; and
  - the facility would meet the relevant policies and criteria of the Development Plan."

## 5.33 Paragraph 5.57

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/14     | RDS              | Friends of the Earth (Gloucestershire) |
| 62637/14     | RDO/C            | Cory Environmental (Glos) Ltd          |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) Delete the word 'inert.'

### Inspector's Reasoning and Conclusions

- 5.33.1 I agree with the WPA's proposal to amend "inert" to read "non-hazardous" in the light of new legislation.

### RECOMMENDATION

- 5.33.2 Paragraph 5.57 third line amend "inert" to read "non-hazardous".

### 5.34 Policy 15 (Special Waste)

#### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 90096/30     | DLO              | Rice Phil Mr                           |
| 88713/15     | RDS              | Friends of the Earth (Gloucestershire) |
| 62542/5      | RDO              | Environmental Services Assoc.          |
| 61775/8      | RDO              | Prestbury Parish Council               |
| 98640/20     | RDO              | Trustees of W. J Liddington (Deceased) |
| 62056/1      | RDO              | Dorset County Council                  |
| 88797/20     | RDO              | Federal Mogul Corporation              |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) More toxic waste collection points are needed.  
(ii) Special waste is a regionally important waste group and not just for Gloucestershire.  
(iii) Gloucestershire should take special waste only if there is not a more sustainable location in the region."  
(iv) Reinstate reference to BPEO

### Inspector's Reasoning and Conclusions

- 5.34.1 **Waste collection** is an essential element in waste management. RDGWLP provides for facilities where they are BPEO but waste operators and landowners need to contribute sites. I do not think that the Plan can go further than providing this framework at this stage.
- 5.34.2 I agree with the objection that this policy reads as "protectionist" and may not result in the best option in terms of overall sustainability. A narrow approach is especially inappropriate when dealing with specialist facilities. I have commented on this elsewhere in my report (eg sections 3.10, 5.3 and 5.7). To accord with national policy I believe that the phrase "for Gloucestershire" and the criterion of need should be omitted from this policy. To leave them in could be misleading.

- 5.34.3 It could be that the BPEO for a special waste facility is outside the County or the region. The BPEO analysis should resolve whether the special wastes in question should be processed outside, or within, Gloucestershire and the extent to which need is an appropriate factor to be applied. BPEO analysis is brought in specifically by reference to other policies in the Plan although it is implicit under the legislation that the whole Plan would apply to any project as far as it was relevant. There is therefore no need to reinstate reference to BPEO in this policy.

#### RECOMMENDATION

- 5.34.4 Delete Policy 15 and substitute; "Facilities for the additional handling, treating, processing or disposal of special wastes will be permitted if it can be demonstrated:
- That it would form part of a sustainable waste management system; and
  - That it would meet the relevant policies and criteria of the Development Plan."

#### 5.35 Paragraph 5.61

##### Comments

| Comments No. | Status (See Key) | Name            |
|--------------|------------------|-----------------|
| 99020/11     | RDO              | Chaplin S M Mrs |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

##### Summary of Objections

- (i) A clear statement of intent is required as all the wastes are potentially hazardous

#### Inspector's Reasoning and Conclusions

- 5.35.1 I feel that policy 15 and other policies in the Plan, and the explanations in Chapters 1 and 2, adequately cover waste hazards subject to other comments in my report.

#### RECOMMENDATION

- 5.35.2 No change to the Plan as a result of this objection.

#### 5.36 Policy 16 (Mining of Waste)

##### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/44     | DO/W             | Friends of the Earth (Gloucestershire) |
| 90096/26     | DLO              | Rice Phil Mr                           |
| 62613/10     | DO/W             | Hempsted Residents Association         |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

##### Summary of Objections

- (i) ~~The term 'it' is ambiguous. It is used to refer to both the process of mining waste as in the first line, and the waste being mined as in lines 3 and 4~~
- (ii) The policy states that mining of waste will only be allowed when it is harmful to health



## Inspector's Reasoning and Conclusions

5.36.1 This objection has been accepted by the WPA and action taken in RDGWLP.

### RECOMMENDATION

5.36.2 No change to the Plan as a result of this objection.

## 5.37 Policy 17 (Incineration without Energy Recovery)

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/45     | DO               | Friends of the Earth (Gloucestershire) |
| 61885/1      | DS               | Stroud Town Council                    |
| 62569/39     | DS               | Environment Agency                     |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) The policy should be strengthened to state that such proposals will not be permitted since there is adequate capacity

## Inspector's Reasoning and Conclusions

5.37.1 I see policy 17 as applying to complement policy 14 in special circumstances. Whereas I have approached policy 14 as being permissive, a facility without energy recovery would need to be an exception to succeed in sustainability terms. The negative approach is therefore appropriate but not the outright ban on such development sought by Stroud Town Council and FEG. There may be adequate capacity now. But this Plan needs to be relevant until 2012.

5.37.2 There seems no reason why the criteria of BPEO and the Development Plan should not be expressed as in other policies but in a stronger way to reflect the waste hierarchy at Figure 2.1 of the Plan.

### RECOMMENDATION

5.37.3 In policy 17 after "option" add, "and it forms part of a sustainable waste management system."

## 5.38 Policy 18 (Sewage & Water Treatment)

### Comments

| Comments No. | Status (See Key) | Name                |
|--------------|------------------|---------------------|
| 88756/8      | DO               | Living Green Centre |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) Water resource management and surface/groundwater recharge should be a key aim of the management of greywater and sewerage.

- (ii) Encourage alternatives to conventional semi-industrial processes in anaerobic digesters

## Inspector's Reasoning and Conclusions

- 5.38.1 I agree with the thrust of the first objection. The GWLP needs to take the lead on how waste water and sewage is dealt with in terms of land-use. The Plan is clear from policy 1 that new waste development should be the BPEO and I see no reason why that should not apply to waste water and sewage. Requiring the use of existing sewage treatment sites for new development seems to be introducing undue weighting into the BPEO analysis when it should be an objective exercise. This analysis should reveal whether existing sites are sustainable or not. The requirements imposed on other waste management systems are also conspicuously absent from this policy for no apparent reason. This could lead to less effective water management by perpetuating inappropriate sites. Using old sites rather than new has benefits in efficiency in land-use in BPEO analysis in any event so placing restrictions in GWLP seems unnecessary as well as inappropriate.
- 5.38.2 I also accept the unchallenged merits of considering more natural options for processing waste water, such as reed beds. The text of policy 18 could usefully include reference to this. Please also see section 5.23 of my report.

## RECOMMENDATIONS

- 5.38.3 Delete policy 18 and substitute, "Proposals for the treatment and disposal of sewage and sewage sludge will be permitted in appropriate locations where it can be demonstrated that;
- The facility would be part of a sustainable waste management system; and
  - The facility would meet the relevant policies and criteria of the Development Plan."
- 5.38.5 At the end of paragraph 5.68 add, "Consideration should be given to employment of environmentally enhancing systems such as reed beds and wetlands in appropriate circumstances."

## 5.39 Policy 19 (Landfill/Landraise)

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/46     | DO               | Friends of the Earth (Gloucestershire) |
| 90096/31     | DLO              | Rice Phil Mr                           |
| 88658/22     | DO               | Hannaford John                         |
| 62542/5      | DO               | Environmental Services Assoc.          |
| 88681/2      | DO               | W R Haines (Leasow Farms) Ltd          |
| 62569/24     | DO/W             | Environment Agency                     |
| 65900/2      | DS               | Cotswolds AONB Partnership             |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

- (i) ~~Landfilling could be a local solution to specific waste arisings as BPEO~~
- (ii) New landfill/landraise proposals and extensions to existing landfill/landraise sites should be permitted where it can be demonstrated that they contribute to a sustainable waste management system and meet the criteria and policies of the plan.
- (iii) Proof of need is not normally required.
- (iv) Any proposal should make a 'significant' contribution to sustainable waste management
- (v) Refer to continuations of policy 6 sites in the supporting text to policy 19

## Inspector's Reasoning and Conclusions

- 5.39.1 Because landfilling could, in certain circumstances be the BPEO, even though there is no "need" as such because sufficient capacity is available in the County as a whole, the way the policy is phrased could work against sustainability and be in tension with other policies in the Plan. The WPA's concern that landfill sites will be permitted in excess of requirement does not seem plausible when policy 1 requires the BPEO; when landfill is very low in the hierarchy; and when there is substantial spare landfill capacity in the County. I therefore do not see the case for "need" (in the sense of capacity) as a specific criterion. The general "need" for the development may be introduced as a material consideration if the harmful effects are sufficiently substantial (please see section 5.3 of my report). I therefore agree with ESA that the criteria for landfill/landraise should align with other waste management methods although the strong policy objection to it should be reflected in a negative form of wording. No other strengthening seems necessary to achieve sustainability.
- 5.39.2 I see no conflict between policy 19 and policy 6 because of the other policies in the Plan, such as policies 1 to 3, and policy 1 in particular. These policies should ensure that existing landfill/landraise sites are not extended, or are used for other facilities, unless the BPEO analysis supports it.

## RECOMMENDATIONS

- 5.39.3 Delete policy 19 and substitute, "New landfill/landraise proposals will not be permitted unless it can be demonstrated that;
- The facility would be part of a sustainable waste management system; and
  - The facility would meet the relevant policies and criteria of the Development Plan."
- 5.39.4 Paragraph 5.72 third line amend "will" to read "may well".

## 5.40 Paragraph 5.72

### Comments

| Comments No. | Status (See Key) | Name                          |
|--------------|------------------|-------------------------------|
| 62542/4      | DO               | Environmental Services Assoc. |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

- (i) Recognise the important role of landfill in an integrated waste management framework

## Inspector's Reasoning and Conclusions

- 5.40.1 I agree that the role of landfill/landraise is understated in this part of the plan but not in paragraph 5.72. Paragraph 5.75 says the role will be "small". Bearing in mind the firm policy move away from landfill, and that this will be an evolutionary process, but there is considerable landfill now, "small" does not seem to reflect the position accurately during the Plan period. I do not think that admitting this undermines the policy. I propose that the Plan should be amended accordingly.

## RECOMMENDATION

5.40.2 Paragraph 5.75 line 2 delete “small” and substitute “diminishing but, for the time being, important”.

#### 5.41 Paragraph 5.75

##### Comments

| Comments No. | Status (See Key) | Name                          |
|--------------|------------------|-------------------------------|
| 62637/3      | DO               | Cory Environmental (Glos) Ltd |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

##### Summary of Objections

- (i) Recognise the important role of landfill in an integrated waste management framework

##### Inspector's Reasoning and Conclusions

5.41.1 I agree with this objection for the reasons given in section 5.40 of my report.

##### RECOMMENDATION

5.41.2 Paragraph 5.75 line 2 delete “small” and substitute “diminishing but, for the time being, important”.

#### 5.42 Policy 20 (Agricultural Improvements)

##### Comments

| Comments No. | Status (See Key) | Name                                    |
|--------------|------------------|---|
| 65900/3      | DO               | Cotswolds AONB Partnership              |
| 62569/40     | DS               | Environment Agency                      |
| 88192/3      | DO/W             | Wildfowl & Wetlands Trust               |
| 61991/2      | DLO              | DEFRA (Formerly FRCA on behalf of MAFF) |
| 89364/2      | DO               | Duncliffe P E                           |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

##### Summary of Objections

- (i) What does ‘close proximity’ mean?
- (ii) Biodiversity and geology criteria are needed.
- (iii) ~~Add: “That there is no loss of existing naturally occurring biodiversity by such landfilling or landraising activities.”~~
- (iv) The best and most versatile land should be preserved.

##### Inspector's Reasoning and Conclusions

5.42.1 Because circumstances vary widely and a number of factors need to be balanced, defining ‘**close proximity**’ is difficult and could be counter-productive. The phrase makes it clear that close proximity is a requirement which is as far as I believe the policy text should go.

5.42.2 **Biodiversity and geology** are very important considerations. They are given effect by many policies in the Plan including policies 1, 2, 3, 22, 23 and 24 that are brought in by item 6 of the policy text. This seems sufficient.

- 5.42.3 The **best and most versatile land** should be preserved as a principle of sustainability (PPG7 paragraphs 2.16 to 2.20) and this should be stated in policy 20. It is for the relevant authorities to support this policy as best they can. Policy 20 will then be consistent with policy 32 (development on agricultural land).

#### RECOMMENDATION

- 5.42.4 Add the following new item to the text of policy 20, "The best and most versatile agricultural land (grades 1, 2 & 3a) will not be affected by the project;"

#### 5.43 Policy 21 (Landspreading)

##### Comments

| Comments No. | Status (See Key) | Name                       |
|--------------|------------------|----------------------------|
| 62569/25     | DO/W             | Environment Agency         |
| 65900/4      | DO               | Cotswolds AONB Partnership |
| 62569/41     | DS               | Environment Agency         |
| 88658/23     | DO               | Hannaford John             |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

##### Summary of Objections

- (i) Need to prevent loss of biodiversity
- (ii) ~~If list 1 substances are landspread, for no agricultural benefit, a ground water authorisation will probably be required~~

#### Inspector's Reasoning and Conclusions

- 5.43.1 Biodiversity is given effect by many policies in the Plan including policies 1, 2, 3, 22, 23 and 24 that are brought in to play by section 54A of the Town and Country Planning Act 1990 when planning applications are considered. This seems sufficient.

#### RECOMMENDATION

- 5.43.2 No change to the Plan as a result of this objection.

#### 5.44 Paragraph 5.84

##### Comments

| Comments No. | Status (See Key) | Name                                    |
|--------------|------------------|---|
| 61991/3      | DLO              | DEFRA (Formerly FRCA on behalf of MAFF) |
| 61897/5      | DO/W             | Westbury On Severn Parish Council       |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

##### Summary of Objections

- (i) Reference to the MAFF Soil Code should include the full title
- (ii) ~~Relevancy to recent events in Westbury on Severn~~

## Inspector's Reasoning and Conclusions

5.44.1 This objection has been acted upon and the Plan amended accordingly.

### RECOMMENDATION

5.44.2 No change to the Plan as a result of this objection.

## 5.45 Paragraph 5.86

### Comments

| Comments No. | Status (See Key) | Name           |
|--------------|------------------|----------------|
| 62013/5      | DO               | English Nature |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) GCC's duties as a Competent Authority should be referred to.

## Inspector's Reasoning and Conclusions

5.45.1 I agree with the thrust of the objection and feel that, as a matter of public information, the County Council's role should be mentioned. Please see also section 1.4 of my report.

### RECOMMENDATION

5.45.2 Add to the end of paragraph 5.87 of the Plan, "In addition, Gloucestershire County Council is a 'competent authority' under the Conservation (of Natural Habitats &c.) Regulations 1994 with defined duties to conservation under the EC Birds and Habitats Directives."

## 5.46 Policy 22 (Nature Conservation – International/National Sites)

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/47     | DS               | Friends of the Earth (Gloucestershire) |
| 89977/8      | DLS              | Kirby Jeff Dr                          |
| 90096/32     | DLO              | Rice Phil Mr                           |
| 62043/24     | DO               | Gloucester City Council                |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) The Biodiversity Action Plan should be incorporated into GWLP
- (ii) Protection is needed from air and water borne emissions
- (iii) Remove Sharpness as a preferred site.

## Inspector's Reasoning and Conclusions

5.46.1 RDGWLP Policy 23, as explained in paragraph 5.91, seeks to implement the County's Biodiversity Action Plan. Other local plans that form the Development Plan designate land

to support the Biodiversity Action Plan. The profiles of the preferred sites in RDGWLP record environmental designations and RDGWLP applies policy 1 (BPEO). I am in no doubt that biodiversity will be properly considered in appropriate circumstances when the GWLP is put into effect.

5.46.2 **Protection of special sites** from air and water borne emissions is implicit in this, and other, policies. The policies therefore seem effective if the evidence supports the probability that material harm would be caused by a development.

5.46.3 Please see sections 4.26 and 4.51 of my report on **Sharpness**.

## RECOMMENDATION

5.46.4 No change to policy 22 as a result of these objections.

## 5.47 Policy 23 (Local Nature Conservation Sites)

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/48     | DS               | Friends of the Earth (Gloucestershire) |
| 65979/2      | DO               | Lafarge Redland Aggregates Ltd         |
| 61775/9      | RDO              | Prestbury Parish Council               |
| 88713/16     | RDO              | Friends of the Earth (Gloucestershire) |
| 89977/9      | DLS              | Kirby Jeff Dr                          |
| 90096/33     | DLO              | Rice Phil Mr                           |
| 62542/3      | DO/W             | Environmental Services Assoc.          |
| 62009/4      | DO/W             | Government Office for the South West   |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

### Initial Deposit

- (i) ~~Refer to 'unacceptable impact' as grounds for not granting planning permission.~~
- (ii) ~~Reference to 'adverse impact' should be qualified~~
- (iii) Delete 'an' and replace with 'a significant'
- (iv) Air and water borne emissions would be harmful especially from Sharpness.
- (v) Mitigation should include measures to secure the long term management of existing or compensatory features.

### Revised Deposit

- (i) The amendments weaken and confuse the policy.
- (ii) Delete 'compromising' and 'not capable of mitigation' from the text as they weaken the policy

## Inspector's Reasoning and Conclusions

5.47.1 The amendments in RDGWLP seem to strike the right balance and achieve the object of protection without stifling appropriate waste management facilities. I do not see the revised policy as being weak, particularly when linked to other policies in the Plan.

5.47.2 Please see sections 4.26 and 4.51 of my report on **Sharpness**.

## RECOMMENDATION

5.47.3 No change to policy 23 as a result of these objections.

## 5.48 Policy 24 (Conservation Generally)

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/49     | DO               | Friends of the Earth (Gloucestershire) |
| 65900/5      | DO               | Cotswolds AONB Partnership             |
| 61768/10     | DO               | Friends of the Earth (FoD)             |
| 62013/2      | DO/W             | English Nature                         |
| 62613/12     | DO/W             | Hempsted Residents Association         |
| 88713/17     | RDO              | Friends of the Earth (Gloucestershire) |
| 89977/10     | DLS              | Kirby Jeff Dr                          |
| 90096/34     | DLO              | Rice Phil Mr                           |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

#### Initial Deposit

- (i) ~~Refer to geological and geomorphologic nature conservation sites~~
- (ii) Strengthen protection for features of major importance for wild flora, fauna and cultural heritage

#### Revised Deposit

- (i) The term 'can' should be changed to 'will.'

### Inspector's Reasoning and Conclusions

5.48.1 These objections seek to strengthen protection of flora, fauna and cultural heritage to the point where these features risk suffering no harm in any circumstances. While this is a laudable aim, and adverse effects should be minimised and eliminated if practicable, such stringent requirements could make it impossible to process waste in today's world. The wording in the RDGWLP provides strong protection, and a practical approach, while technology and practices improve to take us towards the low levels of risk that we would like to achieve in due course. I see no reason for further amendment of this policy.

## RECOMMENDATION

5.48.2 No change to the Plan as a result of these objections.

## 5.49 Policy 25 (Green Belt)

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/50     | DO/W             | Friends of the Earth (Gloucestershire) |
| 61775/6      | DO               | Prestbury Parish Council               |
| 65979/4      | DS               | Lafarge Redland Aggregates Ltd         |
| 88662/13     | DO               | Phelps Bros                            |



|          |      |                                      |
|----------|------|--------------------------------------|
| 62046/2  | DO   | Cheltenham Borough Council           |
| 88658/24 | DO   | Hannaford John                       |
| 62542/2  | DO   | Environmental Services Assoc.        |
| 62009/5  | DO/W | Government Office for the South West |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) The tests set for new facilities do not fully reflect the contents of PPG 2
- ~~(ii) Green belt protection~~
- (iii) Delete 'which is genuinely acceptable'
- (iv) Green Belts should not be used for waste fill or waste development in the Plan

### Inspector's Reasoning and Conclusions

5.49.1 RDGWLP deletes this policy and substitutes redrafted policy RD25 accepting the general thrust of these objections. I address the Green Belt policy at section 5.73 of my report.

### RECOMMENDATION

5.49.2 No change to deleted policy 25.

### 5.50 Policy 26 (Areas of Outstanding Natural Beauty)

#### Comments

| Comments No. | Status (See Key) | Name                                      |
|--------------|------------------|---|
| 63039/4      | DO               | Vision 21 Waste & Pollution Working Group |
| 61775/7      | DO               | Prestbury Parish Council                  |
| 62043/14     | RDS              | Gloucester City Council                   |
| 61775/10     | RDO              | Prestbury Parish Council                  |
| 62005/14     | RDO              | Countryside Agency                        |
| 88713/18     | RDO              | Friends of the Earth (Gloucestershire)    |
| 62043/25     | DO/W             | Gloucester City Council                   |
| 88713/54     | DS               | Friends of the Earth (Gloucestershire)    |
| 61768/11     | DO               | Friends of the Earth (FoD)                |
| 62569/26     | DO/W             | Environment Agency                        |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

#### Initial Deposit

- ~~(i) There should be requirements for mitigation measures should essential development take place in AONB's~~
- (ii) Add 'areas considered to be of equal value to AONB areas' after 'areas of outstanding natural beauty.'
- (iii) Insert 'adjacent' before 'AONB.'
- (iv) There should be no waste development in AONB's during the period of the Plan
- (v) Exclude all waste development within areas of outstanding natural beauty other than municipal recycling and waste transfer stations.

#### Revised Deposit

- (i) After line 4 insert 'national interest' and before the revision insert 'where there has been thorough public consultation, a clear contract of the period of activity including restoration...'
- (ii) Replace 'can' with 'will.'
- (iii) Replace 'mitigated' with 'prevented.'

### Inspector's Reasoning and Conclusions

- 5.50.1 Other areas of value receive protection under other policies in the Plan such as Green Belts (RD25) and Special Landscape Areas (27). AONB's are statutorily designated by the same means, and under the same legislation, as National Parks and so are a particular case meriting a specific policy.
- 5.50.2 The policy would be clearer if its wording reflected the impact on the setting of AONB's as set out in paragraph 5.98 and as defined in PPG7 paragraph 4.8.
- 5.50.3 The strong prohibition on development sought by objectors although well-intentioned, does not reflect the practicality of the situation and the balance necessary. The policy does not discard the precautionary principle, which would be applied when planning applications are decided. The AONB's cover extensive rural areas that need a network of waste facilities to achieve a sustainable system. Minerals workings in these areas may merit waste use pending restoration. However, the siting of major waste development would normally be inconsistent with the aims of AONB designation requiring proven national interest and a lack of alternative sites to justify an exception (PPG7 paragraph 4.8). I therefore agree with the amendment proposed in WPA31a that permits some waste development, but only in appropriate circumstances.
- 5.50.4 I see the reference in the policy to mitigation measures to require waste proposals to be sited in locations where mitigation is possible. This seems strong enough as a criterion together with BPEO. Full mitigation sought by objectors may well be impossible to achieve for a facility that satisfies all other criteria. This places the AONB above all other considerations and creates an effective, and inappropriate, preclusion of development.

### RECOMMENDATION

- 5.50.5 Amend the text of policy 26 to read, "Proposals for waste development within, or adjoining, Areas of Outstanding Natural Beauty, and adversely affecting the natural beauty of their landscape, will only be permitted where:
  - it can be demonstrated to be the Best Practicable Environmental Option; and
  - there is a lack of alternative sites; and
  - there is a proven national interest; and
  - the impact on the special features of the AONB can be mitigated."

### 5.51 Paragraph 5.97

#### Comments

| Comments No. | Status (See Key) | Name                          |
|--------------|------------------|-------------------------------|
| 88681/1      | DO               | W R Haines (Leasow Farms) Ltd |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) An AONB location could be the BPEO for a policy 6 site.

## Inspector's Reasoning and Conclusions

5.51.1 A policy 5 site (Site RD19 Fosse Cross) is in the AONB. I see no reason why a site brought forward under policy 6 should not be appropriate in the right circumstances as I have explained in section 5.50 of my report. I see no need to amend the Plan further.

### RECOMMENDATION

5.51.2 No further change to the Plan as a result of this objection.

## 5.52 Paragraph 5.98

### Comments

| Comments No. | Status (See Key) | Name                       |
|--------------|------------------|----------------------------|
| 65900/6      | DO               | Cotswolds AONB Partnership |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objection

- (i) Rigorous assessment of proposals is needed.

## Inspector's Reasoning and Conclusions

5.52.1 Paragraph 5.98 of RDGWLP calls for "rigorous examination" of proposals which should satisfy the objection.

### RECOMMENDATION

5.52.2 No change to the Plan as a result of this objection.

## 5.53 Policy 27 (Special Landscape Areas)

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/51     | DO               | Friends of the Earth (Gloucestershire) |
| 61775/8      | DO               | Prestbury Parish Council               |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) Proposals should first seek to avoid impacts and then mitigate
- (ii) Waste fill or waste development should be prohibited from these areas in the Plan

## Inspector's Reasoning and Conclusions

5.53.1 I agree that it is preferable that locations are chosen for development that avoid adverse impact with mitigation measures being applied as a secondary stage. This approach should be reflected in the BPEO analysis under policy 1. Policy 27, which complements policy 1, is therefore satisfactory on this point.

5.53.2 Prohibition of waste facilities is impractical in Special Landscape Areas for the same reasons I explain in section 5.50 of my report.

## RECOMMENDATION

5.53.3 No change to the Plan as a result of these objections.

## 5.54 Policy 28 (National Archaeological Sites)

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/55     | DS               | Friends of the Earth (Gloucestershire) |
| 61768/12     | DO               | Friends of the Earth (FoD)             |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) Delete 'significant.'

## Inspector's Reasoning and Conclusions

5.54.1 I see no harm in retention of the word 'significant' given the need for policies to be relevant in a wide variety of circumstances. Paragraph 5.100 of the Plan makes clear that the purpose of the policy is to conserve nationally important archaeological sites and their setting. Any development that prejudices conservation is implicitly prohibited. This is a very strong policy as it stands.

## RECOMMENDATIONS

5.54.2 No change to policy 28 as a result of this objection.

## 5.55 Policy 29 (Local Archaeological Sites)

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/56     | DS               | Friends of the Earth (Gloucestershire) |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## 5.56 Policy 30 (Listed Buildings & Conservation Areas)

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/52     | DO               | Friends of the Earth (Gloucestershire) |
| 61992/1      | DO               | English Heritage                       |
| 61768/13     | DO               | Friends of the Earth (FoD)             |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

- (i) Add to policy “.. of any conservation area, or its setting, will not be permitted unless..”
- (ii) Delete ‘unless the impact can be mitigated’
- (iii) Proposals should first seek to avoid impacts and then mitigate

## Inspector's Reasoning and Conclusions

- 5.56.1 WPA 31a corrects the omission of “the setting” from the text of policy 30.
- 5.56.2 To prohibit mitigation as a way of making development acceptable seems tantamount to opposing change. This is in conflict with society's needs for more and better facilities. The GWLP seeks to promote development but in a sustainable way. Mitigation is a way of achieving those ends. I therefore do not feel that the policy should be changed in respect of mitigation.
- 5.56.3 I agree that it is preferable that locations are chosen for development that avoid adverse impact and then apply mitigation measures. However, this approach should be reflected in the BPEO analysis under policy 1. Policy 30, which complements policy 1, is therefore satisfactory on this point.

## RECOMMENDATION

- 5.56.4 No change to policy 30 as a result of this objection.

## 5.57 Policy 31 (Historic Heritage)

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/53     | DO               | Friends of the Earth (Gloucestershire) |
| 61992/2      | DO               | English Heritage                       |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

- (i) Require reference to the potential importance of the settings of registered parks and gardens and PPG 15
- (ii) Proposals should first seek to avoid impacts and then mitigate

## Inspector's Reasoning and Conclusions

- 5.57.1 On mitigation please see the previous section of my report.
- 5.57.2 I agree with the amendment proposed in WPA 31a that accepts the objection of English Heritage concerning settings and PPG15.

## RECOMMENDATIONS

- 5.57.3 Paragraph 5.104 of the Plan, add to the end of the last sentence, “PPG15 recognises the need to safeguard registered sites and their settings, which will be material factors in making planning decisions.”

## 5.58 Policy 32 (Agricultural Land)

### Comments

| Comments No. | Status (See Key) | Name                                    |
|--------------|------------------|---|
| 88713/57     | DS               | Friends of the Earth (Gloucestershire)  |
| 61991/4      | DLO              | DEFRA (Formerly FRCA on behalf of MAFF) |
| 65979/3      | DO               | Lafarge Redland Aggregates Ltd          |
| 62613/13     | DO/W             | Hempsted Residents Association          |
| 88658/25     | DO               | Hannaford John                          |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) The best and most versatile land should be protected.
- (ii) ~~Line 4 is a confused mixture of the original policy and part of the intended revision.~~
- (iii) Replace 'unless' with 'where.'

### Inspector's Reasoning and Conclusions

5.58.1 These objections seem to have been satisfactorily dealt with by amendments in RDGWLP.

### RECOMMENDATION

5.58.2 No further change to the Plan as a result of these objections.

## 5.59 Paragraph 5.107

### Comments

| Comments No. | Status (See Key) | Name                                    |
|--------------|------------------|---|
| 62009/6      | DO               | Government Office for the South West    |
| 61991/5      | DLO              | DEFRA (Formerly FRCA on behalf of MAFF) |
| 62009/1      | RDO              | Government Office for the South West    |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) Include additional paragraph: This policy does not preclude the importation of fill material to sites where former best and most versatile land has been despoiled by the winning of minerals.
- (ii) Restoration of the best agricultural land should protect its long term potential.

### Inspector's Reasoning and Conclusions

5.59.1 The explanation of this Plan policy ought to reflect national restoration policy set out in MPG7 paragraph 14 (see my report on policy 41 at section 5.82). Leaving it to BPEO does not make the position as clear as it could. WPA 31a suggests further amendments which I have edited slightly.

5.59.2 The RDGWLP seems to adequately address the second objection, which the WPA accepts in its revision and in WPA 31a.

- 5.42.3 The **best and most versatile land** should be preserved as a principle of sustainability (PPG7 paragraphs 2.16 to 2.20) and this should be stated in policy 20. It is for the relevant authorities to support this policy as best they can. Policy 20 will then be consistent with policy 32 (development on agricultural land).

#### RECOMMENDATION

- 5.42.4 Add the following new item to the text of policy 20, "The best and most versatile agricultural land (grades 1, 2 & 3a) will not be affected by the project;"

#### 5.43 Policy 21 (Landspreading)

##### Comments

| Comments No. | Status (See Key) | Name                       |
|--------------|------------------|----------------------------|
| 62569/25     | DO/W             | Environment Agency         |
| 65900/4      | DO               | Cotswolds AONB Partnership |
| 62569/41     | DS               | Environment Agency         |
| 88658/23     | DO               | Hannaford John             |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

##### Summary of Objections

- (i) Need to prevent loss of biodiversity
- (ii) ~~If list 1 substances are landspread, for no agricultural benefit, a ground water authorisation will probably be required~~

##### Inspector's Reasoning and Conclusions

- 5.43.1 Biodiversity is given effect by many policies in the Plan including policies 1, 2, 3, 22, 23 and 24 that are brought in to play by section 54A of the Town and Country Planning Act 1990 when planning applications are considered. This seems sufficient.

#### RECOMMENDATION

- 5.43.2 No change to the Plan as a result of this objection.

#### 5.44 Paragraph 5.84

##### Comments

| Comments No. | Status (See Key) | Name                                    |
|--------------|------------------|---|
| 61991/3      | DLO              | DEFRA (Formerly FRCA on behalf of MAFF) |
| 61897/5      | DO/W             | Westbury On Severn Parish Council       |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

##### Summary of Objections

- (i) Reference to the MAFF Soil Code should include the full title
- (ii) ~~Relevancy to recent events in Westbury on Severn~~

## Inspector's Reasoning and Conclusions

5.44.1 This objection has been acted upon and the Plan amended accordingly.

### RECOMMENDATION

5.44.2 No change to the Plan as a result of this objection.

## 5.45 Paragraph 5.86

### Comments

| Comments No. | Status (See Key) | Name           |
|--------------|------------------|----------------|
| 62013/5      | DO               | English Nature |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) GCC's duties as a Competent Authority should be referred to.

## Inspector's Reasoning and Conclusions

5.45.1 I agree with the thrust of the objection and feel that, as a matter of public information, the County Council's role should be mentioned. Please see also section 1.4 of my report.

### RECOMMENDATION

5.45.2 Add to the end of paragraph 5.87 of the Plan, "In addition, Gloucestershire County Council is a 'competent authority' under the Conservation (of Natural Habitats &c.) Regulations 1994 with defined duties to conservation under the EC Birds and Habitats Directives."

## 5.46 Policy 22 (Nature Conservation – International/National Sites)

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/47     | DS               | Friends of the Earth (Gloucestershire) |
| 89977/8      | DLS              | Kirby Jeff Dr                          |
| 90096/32     | DLO              | Rice Phil Mr                           |
| 62043/24     | DO               | Gloucester City Council                |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) The Biodiversity Action Plan should be incorporated into GWLP
- (ii) Protection is needed from air and water borne emissions
- (iii) Remove Sharpness as a preferred site.

## Inspector's Reasoning and Conclusions

5.46.1 RDGWLP Policy 23, as explained in paragraph 5.91, seeks to implement the County's Biodiversity Action Plan. Other local plans that form the Development Plan designate land



to support the Biodiversity Action Plan. The profiles of the preferred sites in RDGWLP record environmental designations and RDGWLP applies policy 1 (BPEO). I am in no doubt that biodiversity will be properly considered in appropriate circumstances when the GWLP is put into effect.

5.46.2 **Protection of special sites** from air and water borne emissions is implicit in this, and other, policies. The policies therefore seem effective if the evidence supports the probability that material harm would be caused by a development.

5.46.3 Please see sections 4.26 and 4.51 of my report on **Sharpness**.

## RECOMMENDATION

5.46.4 No change to policy 22 as a result of these objections.

## 5.47 Policy 23 (Local Nature Conservation Sites)

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/48     | DS               | Friends of the Earth (Gloucestershire) |
| 65979/2      | DO               | Lafarge Redland Aggregates Ltd         |
| 61775/9      | RDO              | Prestbury Parish Council               |
| 88713/16     | RDO              | Friends of the Earth (Gloucestershire) |
| 89977/9      | DLS              | Kirby Jeff Dr                          |
| 90096/33     | DLO              | Rice Phil Mr                           |
| 62542/3      | DO/W             | Environmental Services Assoc.          |
| 62009/4      | DO/W             | Government Office for the South West   |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

### Initial Deposit

- (i) ——— Refer to 'unacceptable impact' as grounds for not granting planning permission.
- (ii) ——— Reference to 'adverse impact' should be qualified
- (iii) Delete 'an' and replace with 'a significant'
- (iv) Air and water borne emissions would be harmful especially from Sharpness.
- (v) Mitigation should include measures to secure the long term management of existing or compensatory features.

### Revised Deposit

- (i) The amendments weaken and confuse the policy.
- (ii) Delete 'compromising' and 'not capable of mitigation' from the text as they weaken the policy

## Inspector's Reasoning and Conclusions

5.47.1 The amendments in RDGWLP seem to strike the right balance and achieve the object of protection without stifling appropriate waste management facilities. I do not see the revised policy as being weak, particularly when linked to other policies in the Plan.

5.47.2 Please see sections 4.26 and 4.51 of my report on **Sharpness**.

## RECOMMENDATION

5.47.3 No change to policy 23 as a result of these objections.

## 5.48 Policy 24 (Conservation Generally)

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/49     | DO               | Friends of the Earth (Gloucestershire) |
| 65900/5      | DO               | Cotswolds AONB Partnership             |
| 61768/10     | DO               | Friends of the Earth (FoD)             |
| 62013/2      | DO/W             | English Nature                         |
| 62613/12     | DO/W             | Hempsted Residents Association         |
| 88713/17     | RDO              | Friends of the Earth (Gloucestershire) |
| 89977/10     | DLS              | Kirby Jeff Dr                          |
| 90096/34     | DLO              | Rice Phil Mr                           |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

#### Initial Deposit

- (i) ~~Refer to geological and geomorphologic nature conservation sites~~
- (ii) Strengthen protection for features of major importance for wild flora, fauna and cultural heritage

#### Revised Deposit

- (i) The term 'can' should be changed to 'will.'

### Inspector's Reasoning and Conclusions

5.48.1 These objections seek to strengthen protection of flora, fauna and cultural heritage to the point where these features risk suffering no harm in any circumstances. While this is a laudable aim, and adverse effects should be minimised and eliminated if practicable, such stringent requirements could make it impossible to process waste in today's world. The wording in the RDGWLP provides strong protection, and a practical approach, while technology and practices improve to take us towards the low levels of risk that we would like to achieve in due course. I see no reason for further amendment of this policy.

## RECOMMENDATION

5.48.2 No change to the Plan as a result of these objections.

## 5.49 Policy 25 (Green Belt)

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/50     | DO/W             | Friends of the Earth (Gloucestershire) |
| 61775/6      | DO               | Prestbury Parish Council               |
| 65979/4      | DS               | Lafarge Redland Aggregates Ltd         |
| 88662/13     | DO               | Phelps Bros                            |

|          |      |                                      |
|----------|------|--------------------------------------|
| 62046/2  | DO   | Cheltenham Borough Council           |
| 88658/24 | DO   | Hannaford John                       |
| 62542/2  | DO   | Environmental Services Assoc.        |
| 62009/5  | DO/W | Government Office for the South West |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) The tests set for new facilities do not fully reflect the contents of PPG 2
- ~~(ii) Green belt protection~~
- (iii) Delete 'which is genuinely acceptable'
- (iv) Green Belts should not be used for waste fill or waste development in the Plan

### Inspector's Reasoning and Conclusions

5.49.1 RDGWLP deletes this policy and substitutes redrafted policy RD25 accepting the general thrust of these objections. I address the Green Belt policy at section 5.73 of my report.

### RECOMMENDATION

5.49.2 No change to deleted policy 25.

### 5.50 Policy 26 (Areas of Outstanding Natural Beauty)

#### Comments

| Comments No. | Status (See Key) | Name                                      |
|--------------|------------------|---|
| 63039/4      | DO               | Vision 21 Waste & Pollution Working Group |
| 61775/7      | DO               | Prestbury Parish Council                  |
| 62043/14     | RDS              | Gloucester City Council                   |
| 61775/10     | RDO              | Prestbury Parish Council                  |
| 62005/14     | RDO              | Countryside Agency                        |
| 88713/18     | RDO              | Friends of the Earth (Gloucestershire)    |
| 62043/25     | DO/W             | Gloucester City Council                   |
| 88713/54     | DS               | Friends of the Earth (Gloucestershire)    |
| 61768/11     | DO               | Friends of the Earth (FoD)                |
| 62569/26     | DO/W             | Environment Agency                        |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

#### Initial Deposit

- ~~(i) There should be requirements for mitigation measures should essential development take place in AONB's~~
- (ii) Add 'areas considered to be of equal value to AONB areas' after 'areas of outstanding natural beauty.'
- (iii) Insert 'adjacent' before 'AONB.'
- (iv) There should be no waste development in AONB's during the period of the Plan
- (v) Exclude all waste development within areas of outstanding natural beauty other than municipal recycling and waste transfer stations.

#### Revised Deposit

- (i) After line 4 insert 'national interest' and before the revision insert 'where there has been thorough public consultation, a clear contract of the period of activity including restoration...'
- (ii) Replace 'can' with 'will.'
- (iii) Replace 'mitigated' with 'prevented.'

### Inspector's Reasoning and Conclusions

- 5.50.1 Other areas of value receive protection under other policies in the Plan such as Green Belts (RD25) and Special Landscape Areas (27). AONB's are statutorily designated by the same means, and under the same legislation, as National Parks and so are a particular case meriting a specific policy.
- 5.50.2 The policy would be clearer if its wording reflected the impact on the setting of AONB's as set out in paragraph 5.98 and as defined in PPG7 paragraph 4.8.
- 5.50.3 The strong prohibition on development sought by objectors although well-intentioned, does not reflect the practicality of the situation and the balance necessary. The policy does not discard the precautionary principle, which would be applied when planning applications are decided. The AONB's cover extensive rural areas that need a network of waste facilities to achieve a sustainable system. Minerals workings in these areas may merit waste use pending restoration. However, the siting of major waste development would normally be inconsistent with the aims of AONB designation requiring proven national interest and a lack of alternative sites to justify an exception (PPG7 paragraph 4.8). I therefore agree with the amendment proposed in WPA31a that permits some waste development, but only in appropriate circumstances.
- 5.50.4 I see the reference in the policy to mitigation measures to require waste proposals to be sited in locations where mitigation is possible. This seems strong enough as a criterion together with BPEO. Full mitigation sought by objectors may well be impossible to achieve for a facility that satisfies all other criteria. This places the AONB above all other considerations and creates an effective, and inappropriate, preclusion of development.

### RECOMMENDATION

- 5.50.5 Amend the text of policy 26 to read, "Proposals for waste development within, or adjoining, Areas of Outstanding Natural Beauty, and adversely affecting the natural beauty of their landscape, will only be permitted where:
  - it can be demonstrated to be the Best Practicable Environmental Option; and
  - there is a lack of alternative sites; and
  - there is a proven national interest; and
  - the impact on the special features of the AONB can be mitigated."

### 5.51 Paragraph 5.97

#### Comments

| Comments No. | Status (See Key) | Name                          |
|--------------|------------------|-------------------------------|
| 88681/1      | DO               | W R Haines (Leasow Farms) Ltd |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) An AONB location could be the BPEO for a policy 6 site.

## Inspector's Reasoning and Conclusions

5.51.1 A policy 5 site (Site RD19 Fosse Cross) is in the AONB. I see no reason why a site brought forward under policy 6 should not be appropriate in the right circumstances as I have explained in section 5.50 of my report. I see no need to amend the Plan further.

### RECOMMENDATION

5.51.2 No further change to the Plan as a result of this objection.

## 5.52 Paragraph 5.98

### Comments

| Comments No. | Status (See Key) | Name                       |
|--------------|------------------|----------------------------|
| 65900/6      | DO               | Cotswolds AONB Partnership |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objection

- (i) Rigorous assessment of proposals is needed.

## Inspector's Reasoning and Conclusions

5.52.1 Paragraph 5.98 of RDGWLP calls for "rigorous examination" of proposals which should satisfy the objection.

### RECOMMENDATION

5.52.2 No change to the Plan as a result of this objection.

## 5.53 Policy 27 (Special Landscape Areas)

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/51     | DO               | Friends of the Earth (Gloucestershire) |
| 61775/8      | DO               | Prestbury Parish Council               |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) Proposals should first seek to avoid impacts and then mitigate
- (ii) Waste fill or waste development should be prohibited from these areas in the Plan

## Inspector's Reasoning and Conclusions

5.53.1 I agree that it is preferable that locations are chosen for development that avoid adverse impact with mitigation measures being applied as a secondary stage. This approach should be reflected in the BPEO analysis under policy 1. Policy 27, which complements policy 1, is therefore satisfactory on this point.

5.53.2 Prohibition of waste facilities is impractical in Special Landscape Areas for the same reasons I explain in section 5.50 of my report.

## RECOMMENDATION

5.53.3 No change to the Plan as a result of these objections.

## 5.54 Policy 28 (National Archaeological Sites)

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/55     | DS               | Friends of the Earth (Gloucestershire) |
| 61768/12     | DO               | Friends of the Earth (FoD)             |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) Delete 'significant.'

## Inspector's Reasoning and Conclusions

5.54.1 I see no harm in retention of the word 'significant' given the need for policies to be relevant in a wide variety of circumstances. Paragraph 5.100 of the Plan makes clear that the purpose of the policy is to conserve nationally important archaeological sites and their setting. Any development that prejudices conservation is implicitly prohibited. This is a very strong policy as it stands.

## RECOMMENDATIONS

5.54.2 No change to policy 28 as a result of this objection.

## 5.55 Policy 29 (Local Archaeological Sites)

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/56     | DS               | Friends of the Earth (Gloucestershire) |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## 5.56 Policy 30 (Listed Buildings & Conservation Areas)

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/52     | DO               | Friends of the Earth (Gloucestershire) |
| 61992/1      | DO               | English Heritage                       |
| 61768/13     | DO               | Friends of the Earth (FoD)             |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

- (i) Add to policy “.. of any conservation area, or its setting, will not be permitted unless..”
- (ii) Delete ‘unless the impact can be mitigated’
- (iii) Proposals should first seek to avoid impacts and then mitigate

## Inspector's Reasoning and Conclusions

- 5.56.1 WPA 31a corrects the omission of “the setting” from the text of policy 30.
- 5.56.2 To prohibit mitigation as a way of making development acceptable seems tantamount to opposing change. This is in conflict with society's needs for more and better facilities. The GWLP seeks to promote development but in a sustainable way. Mitigation is a way of achieving those ends. I therefore do not feel that the policy should be changed in respect of mitigation.
- 5.56.3 I agree that it is preferable that locations are chosen for development that avoid adverse impact and then apply mitigation measures. However, this approach should be reflected in the BPEO analysis under policy 1. Policy 30, which complements policy 1, is therefore satisfactory on this point.

## RECOMMENDATION

- 5.56.4 No change to policy 30 as a result of this objection.

## 5.57 Policy 31 (Historic Heritage)

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/53     | DO               | Friends of the Earth (Gloucestershire) |
| 61992/2      | DO               | English Heritage                       |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

- (i) Require reference to the potential importance of the settings of registered parks and gardens and PPG 15
- (ii) Proposals should first seek to avoid impacts and then mitigate

## Inspector's Reasoning and Conclusions

- 5.57.1 On mitigation please see the previous section of my report.
- 5.57.2 I agree with the amendment proposed in WPA 31a that accepts the objection of English Heritage concerning settings and PPG15.

## RECOMMENDATIONS

- 5.57.3 Paragraph 5.104 of the Plan, add to the end of the last sentence, “PPG15 recognises the need to safeguard registered sites and their settings, which will be material factors in making planning decisions.”

## 5.58 Policy 32 (Agricultural Land)

### Comments

| Comments No. | Status (See Key) | Name                                    |
|--------------|------------------|---|
| 88713/57     | DS               | Friends of the Earth (Gloucestershire)  |
| 61991/4      | DLO              | DEFRA (Formerly FRCA on behalf of MAFF) |
| 65979/3      | DO               | Lafarge Redland Aggregates Ltd          |
| 62613/13     | DO/W             | Hempsted Residents Association          |
| 88658/25     | DO               | Hannaford John                          |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) The best and most versatile land should be protected.
- (ii) ~~Line 4 is a confused mixture of the original policy and part of the intended revision.~~
- (iii) Replace 'unless' with 'where.'

### Inspector's Reasoning and Conclusions

5.58.1 These objections seem to have been satisfactorily dealt with by amendments in RDGWLP.

### RECOMMENDATION

5.58.2 No further change to the Plan as a result of these objections.

## 5.59 Paragraph 5.107

### Comments

| Comments No. | Status (See Key) | Name                                    |
|--------------|------------------|---|
| 62009/6      | DO               | Government Office for the South West    |
| 61991/5      | DLO              | DEFRA (Formerly FRCA on behalf of MAFF) |
| 62009/1      | RDO              | Government Office for the South West    |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) Include additional paragraph: This policy does not preclude the importation of fill material to sites where former best and most versatile land has been despoiled by the winning of minerals.
- (ii) Restoration of the best agricultural land should protect its long term potential.

### Inspector's Reasoning and Conclusions

5.59.1 The explanation of this Plan policy ought to reflect national restoration policy set out in MPG7 paragraph 14 (see my report on policy 41 at section 5.82). Leaving it to BPEO does not make the position as clear as it could. WPA 31a suggests further amendments which I have edited slightly.

5.59.2 The RDGWLP seems to adequately address the second objection, which the WPA accepts in its revision and in WPA 31a.



## RECOMMENDATIONS

- 5.59.3 In paragraph 5.107 line 5 after “grade.” insert “This includes importation of fill material to restore the long term agricultural potential of sites formerly on the best and most versatile land and which have been despoiled by development of any kind.”
- 5.59.4 At the end of paragraph 5.107 add “Policy 41 concerns restoration of temporary waste sites.”

## 5.60 Policy 33 (Water Pollution)

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/58     | DS               | Friends of the Earth (Gloucestershire) |
| 62569/27     | DO               | Environment Agency                     |
| 88192/4      | DO/W             | Wildfowl & Wetlands Trust              |
| 62613/14     | DO/W             | Hempsted Residents Association         |
| 62569/2      | RDO/W            | Environment Agency                     |
| 89977/11     | DLS              | Kirby Jeff Dr                          |
| 61768/14     | DO               | Friends of the Earth (FoD)             |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

#### Initial Deposit

- (i) Hydrological and geological surveys are essential
- (ii) Unacceptable risk is not sufficiently prohibitive.
- ~~(iii) The policy should be extended to the protection of lakes (62613/14)~~
- ~~(iv) The policy should clearly define the risks which may be regard as acceptable and unacceptable. Strengthen the onus on any developer to ensure more than just an assessment of the potential of risk (88192/4)~~

#### Revised Deposit

- ~~(i) Replace ‘lakes’ with ‘bodies of water.’~~

### Inspector's Reasoning and Conclusions

- 5.60.1 Paragraph 5.108 of the Plan requires hydrological and geological surveys to be carried out but in appropriate circumstances. Bearing in mind the wide variety of types and scale of waste development that may arise, and the Environment Agency's position as a consultee in most planning applications, the WPA's proposals in RDGWLP as amended by WPA 31a, seem adequate. WPA 31a accepts the suggestion for buffer strips to be required and to add the Environment Agency's guidance on groundwater protection. There is no mistaking the importance of the issue from the Plan.
- 5.60.2 WPA 31 clarifies “lakes” and “bodies of water”.
- 5.60.3 The prohibition of risk is too stringent a requirement in my view, if it is possible to achieve. Day to day life is full of risk so I feel that it is right for the WPA to assess, on the public's behalf, whether the risk of pollution in any particular case is acceptable having applied the various tests set out in the Plan. Where a permit is required, the Environment Agency will impose its own requirements to control risk too.

## RECOMMENDATIONS

- 5.60.4 In the third line of the text of policy 33 amend “lakes” to read “bodies of water”.
- 5.60.5 After the last sentence of paragraph 5.108 add “The use of an appropriate buffer strip along any significant watercourses will also need to be considered to give protection from pollution and to safeguard wildlife corridors.”
- 5.60.6 After the last sentence of paragraph 5.109 add “The Agency has also produced ‘Policy and Practice for the Protection of Groundwater’ which provides helpful guidance.”

## 5.61 Policy 34 (Flood Control)

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/59     | DS               | Friends of the Earth (Gloucestershire) |
| 62569/28     | DO/W             | Environment Agency                     |
| 62613/15     | DO/W             | Hempsted Residents Association         |
| 62043/15     | RDS              | Gloucester City Council                |
| 61768/15     | DO               | Friends of the Earth (FoD)             |
| 90096/35     | DLO              | Rice Phil Mr                           |
| 62043/26     | DO/W             | Gloucester City Council                |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) ~~Reword : “Proposals for waste development will only be permitted where there would be no unacceptable risk of development impeding the flow of surface or groundwater, reducing flood storage capacity or increasing the rate of surface water run off, which would result in flooding near the site or elsewhere”~~
- (ii) Unacceptable risk is not sufficiently prohibitive.
- (iii) ~~The policy is simplistic compared to the Environment Agency’s requirements~~
- (iv) ~~Extend the policy to avoid waste facilities removing flood containment capacity~~
- (v) Pollution is the WPA’s responsibility as well as the Environment Agency.

### Inspector’s Reasoning and Conclusions

- 5.61.1 Please see the previous section of my report on prohibiting risk. The same applies to this policy.
- 5.61.2 The objection no. (v) seems to misunderstand paragraph 5.118 of the Plan which sets out the relationship between pollution control and land-use regulation. It seems to clearly say that, where land-use impacts occur, then the WPA will consider the effects but it will not interfere with regulation of the waste process that is the waste licensing authority’s responsibility. Where pollution is likely to have land-use effects to a material degree, the planning authority will consider these effects in making its decision. I expand on this in section 5.65 of my report where I recommend amendment of paragraph 5.118 of the Plan.

### RECOMMENDATION

- 5.61.3 No change to the Plan as a result of these objections other than those at section 5.65 of my report.

## 5.62 Paragraph 5.112

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/60     | DO               | Friends of the Earth (Gloucestershire) |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) It is unclear how the development considerations relate to policies in the plan since it repeats some of the issues but not all.

### Inspector's Reasoning and Conclusions

- 5.62.1 The Plan may be clearer and more consistent if paragraph 5.112 indicates that the list is not exhaustive as well as the statement to that effect over the page at paragraph 5.113.
- 5.62.2 At section 5.3 of my report I explain why I feel that need for a waste development may not be a material consideration in all planning applications. That factor should modify the application of this paragraph of the Plan.

### RECOMMENDATION

- 5.62.3 Amend the first line of paragraph 5.112 to read "Consideration will be given to all relevant aspects of the development which could include the following:"

## 5.63 Paragraph 5.116

### Comments

| Comments No. | Status (See Key) | Name                      |
|--------------|------------------|---------------------------|
| 88192/5      | DO               | Wildfowl & Wetlands Trust |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) Remove the line '..with a capacity exceeding 100 tonnes per day..' from the 7<sup>th</sup> and 8<sup>th</sup> lines as the EIA should be carried out on all proposals for incineration or chemical treatment of hazardous waste

### Inspector's Reasoning and Conclusions

- 5.63.1 Please see section 4.10 of my report on EIA. I do not feel that this objection warrants further amendment to the Plan.

### RECOMMENDATION

- 5.63.2 No change to paragraph 5.116 of the Plan apart from that at recommendation 4.10.11.

## 5.64 Paragraph 5.117

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/61     | DO               | Friends of the Earth (Gloucestershire) |
| 88192/2      | DO/W             | Wildfowl & Wetlands Trust              |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) Consultation is needed with local communities as well as statutory bodies.
- (ii) ~~The policy should ensure that there is no conflict between pollution control authorisation and the planning requirements~~

### Inspector's Reasoning and Conclusions

- 5.64.1 Paragraph 5.148 of the Plan suggests consultation after planning permission has been granted but the WPA and the Plan cannot require it at any stage. The regulations for Planning Applications in the General Development Procedure Order 1995 (SI 1995 No. 419) sets out the consultation requirements that the Government considers are necessary. Nevertheless, I agree with the WPA's suggestion in WPA31a that it is good practice (as advised in PPG10 paragraph A55) for full and continuous consultation to take place.

### RECOMMENDATION

- 5.64.2 Add to the end of paragraph 5.114, "In addition, applicants are encouraged to undertake their own consultation with the local host community before proposals are submitted and as appropriate thereafter."

## 5.65 Paragraph 5.118

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/62     | DO               | Friends of the Earth (Gloucestershire) |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) GCC's responsibility to consider the pollution risks needs to be made clearer.
- (ii) The WPA must require developers to provide adequate data and analysis.

### Inspector's Reasoning and Conclusions

- 5.65.1 The WPA accepts that the regulatory responsibilities of the planning and pollution systems need to be clearer and for sufficient data to be made available. It suggests further explanation in WPA31a. I have commented on these systems of control at other sections of my report (eg section 5.61). The division of responsibility is such an important issue for the public to understand, and because it is often misunderstood, I feel that it merits more extensive treatment including a summary of quotations from the guidance in PPG23. This is probably best done by starting with a basic explanation before going into detail. The distinction of the regimes also needs a clearer explanation of the materiality of fear as set out in recent Court judgements.

## RECOMMENDATIONS

### 5.65.2 Insert 2 new paragraphs before paragraph 5.117 as follows:

“The planning system controls the development and use of land in the public interest. It has an important part to play in determining the location of development which may give rise to pollution. The potential for pollution affecting the use of land is capable of being a material consideration in deciding whether to grant planning permission. The planning system should also control other development in proximity to potential sources of pollution. The role of the planning system focuses on whether the development itself is an acceptable use of land rather than the control of the processes or substances themselves. It also assumes that the pollution control regime will operate effectively. Planning authorities should not substitute their own judgement on pollution control issues for that of the bodies with the relevant expertise and the statutory responsibility for that control. Planning controls therefore complement the pollution control regime.”

“The dividing line between planning and pollution controls is not always clear cut. Both seek to protect the environment but the scope of land-use planning is wider than pollution control. Matters which will be relevant to a pollution control licence may also be material considerations to be taken into account in planning decisions. The weight to be attached to such matters will depend upon the scope of the pollution control system in each particular case.”

### 5.65.3 Delete the first 2 sentences of paragraph 5.118 and substitute “Perceived risk is a material consideration but the weight to be accorded to it will depend upon its land-use consequences. If it is soundly based, and is not simply prejudice, it is likely to have influential weight.”

### 5.65.4 After the third sentence of paragraph 5.118 insert “Therefore, if there is the potential for pollution then, in consultation with the Environment Agency, the WPA will require appropriate information to be submitted by the applicant. However,” and alter the first letter of the fourth sentence to lower case.

## 5.66 Policy 35 (Waste Minimisation)

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/63     | DO/W             | Friends of the Earth (Gloucestershire) |
| 62569/42     | DS               | Environment Agency                     |
| 89364/1      | DO               | Duncliffe P E                          |
| 89808/16     | DO               | Robert Hitchins Ltd                    |
| 90096/36     | DLO              | Rice Phil Mr                           |
| 88662/14     | DO               | Phelps Bros                            |
| 88713/20     | RDO              | Friends of the Earth (Gloucestershire) |
| 88713/19     | RDS              | Friends of the Earth (Gloucestershire) |
| 62073/7      | DS               | Wiltshire County Council               |
| 62073/4      | RDS              | Wiltshire County Council               |
| 61775/11     | RDS              | Prestbury Parish Council               |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

#### Initial Deposit

- (i) Either reword to make the categories of application clear or omit the policy altogether
- ~~(ii) Amend bullet point one to read, 'Maximise waste reduction, reuse and recycling.'~~
- (iii) The Waste Minimisation Act 1998 needs better implementation
- (iv) The policy should be deleted, as it is meaningless and inappropriate.
- (v) Not a land-use policy and does not set out criteria for planning applications.

#### Revised Deposit

- (i) Better reflect the need for waste minimisation

### Inspector's Reasoning and Conclusions

- 5.66.1 I see policy 35 as a good policy that affects all development and makes waste management more sustainable at an early point in the waste cycle. Although it has an unfortunate bureaucratic aspect, by adding a requirement to formalise waste management as part of all development proposals, it is likely to exert a useful, and worthwhile, discipline into waste handling. I do not see it as unreasonable, unduly onerous or vague but as having overall benefit in the public interest. WPA3 and WPA29 set out the policy background.
- 5.66.2 The policy affects matters of land-use, namely achieving sustainability in the use of land for waste management, and so is relevant. Compliance can be judged as a matter of fact and degree although the policy would be clearer if it was rephrased and stated that its purpose is to achieve sustainable management of waste. The policy will form part of the Development Plan and fall to be considered by local planning authorities under section 54A of the Town and Country Planning Act 1990 in a similar way to policy 7 (safeguarding).
- 5.66.3 Objectors' proposals to improve waste minimisation through taxation and charging regimes are beyond the powers of the WPA.

### RECOMMENDATION

- 5.66.4 Delete the text of policy 35 and substitute:

"Proposals for development requiring planning permission shall include a scheme for sustainable management of the waste generated by the development during construction and during subsequent occupation. The scheme shall include measures to:

- Minimise, re-use and recycle waste; and
- Minimise the use of raw materials; and
- Minimise the pollution potential of unavoidable waste; and
- Dispose of unavoidable waste in an environmentally acceptable manner.

Initiatives to reduce waste generation will be encouraged throughout the County."

### 5.67 Paragraph 5.119

#### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/64     | DO/W             | Friends of the Earth (Gloucestershire) |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) ~~Local authorities should consider waste generation in their development of plans and policies and to develop policies to require the proper consideration of waste in development proposals~~

## 5.68 Paragraph 5.120

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/21     | RDS              | Friends of the Earth (Gloucestershire) |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## 5.69 Paragraph RD5.120

### Comments

| Comments No. | Status (See Key) | Name               |
|--------------|------------------|--------------------|
| 62005/15     | RDS              | Countryside Agency |
| 99020/12     | RDS              | Chaplin S M Mrs    |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## 5.70 Paragraph RD5.120a

### Comments

| Comments No. | Status (See Key) | Name               |
|--------------|------------------|--------------------|
| 62005/16     | RDS              | Countryside Agency |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## 5.71 Paragraph RD5.120b

### Comments

| Comments No. | Status (See Key) | Name               |
|--------------|------------------|--------------------|
| 62005/17     | RDS              | Countryside Agency |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## 5.72 Paragraph RD5.120c

### Comments

| Comments No. | Status (See Key) | Name               |
|--------------|------------------|--------------------|
| 62005/18     | RDS              | Countryside Agency |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### 5.73 Policy RD25 (Green Belt)

#### Comments

| Comments No. | Status (See Key) | Name                       |
|--------------|------------------|----------------------------|
| 62005/19     | RDS              | Countryside Agency         |
| 62046/1      | RDO              | Cheltenham Borough Council |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

#### Summary of Objections

- (i) Clarify the distinction between waste management development and facilities
- (ii) The openness of the Green Belt should be asserted in the Plan including the requirement to demonstrate lack of alternative sites before development in the Green Belt.

#### Inspector's Reasoning and Conclusions

- 5.73.1 I addressed the subject of Green Belt designation in considering objections to the Wingmoor Farm sites 1 and 2. Please see section 4.20 of my report. PPG2 is clear that development in the Green Belt should not prejudice the objectives of designation and PPG10 says that such locations will not generally prove acceptable for waste management facilities. Development of Green Belt sites is therefore likely to require justification and, with BPEO analysis, a review of alternative sites. I see a waste "facility" as being a form of waste management "development" and needing no clarification.
- 5.73.2 Where waste development in the Green Belt is employed on a site that is temporary, such as when restoration of land is taking place, then facilities should not prolong that restoration and the eventual openness that would result. This requires small but important amendment to policy RD25 to provide for demountable buildings and plant in appropriate circumstances.
- 5.73.3 The WPA suggests in WPA 31a that the Green Belt policy warrants its own title. I agree.

#### RECOMMENDATIONS

- 5.73.4 Add a new title after paragraph RD 5.120c and before policy RD25 to read "DEVELOPMENT IN THE GREEN BELT".
- 5.73.5 Make the second and third parts of policy RD25 subordinate to the first part by:
- Deleting the full stop at the end of the first paragraph and adding "in the following instances:"
  - Make the second paragraph on "construction" sub-paragraph (a).
  - Make the third paragraph on "re-use of buildings" sub-paragraph (b).
- 5.73.6 In the last line of what is recommended to become sub-paragraph (a) delete "surrounding," and substitute "surroundings and the likely duration of the waste management operations".

### 5.74 Policy 36 (Proximity to Other Land Uses)

#### Comments



| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/65     | DO               | Friends of the Earth (Gloucestershire) |
| 61921/5      | DLO              | Bishops Cleeve Parish Council          |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) The policy should be strictly enforced regardless of economic expediency
- (ii) Remove 'where appropriate' since all developments should be required to implement suitable measures to at the very least control these impacts

### Inspector's Reasoning and Conclusions

- 5.74.1 The WPA will be responsible for enforcement of the policy once the Plan has been adopted. The policy seems capable of implementation. The WPA must balance environmental impact against economic factors in the BPEO analysis. Policy 36 does not seem to require amendment to assist enforceability. I comment on the explanatory text below.
- 5.74.2 I agree that the expression "where appropriate" should be amended because these effects should be controlled as part of the design of waste facilities. All the sites in RDGWLP need these controls in varying degrees. Requiring "appropriate" measures would not require a control where none was needed.

### RECOMMENDATIONS

- 5.74.3 Policy 36 line 6 amend, "Where appropriate, suitable" to read, "Appropriate".
- 5.74.4 As per section 5.1 of my report.

### 5.75 Paragraph 5.122

#### Comments

| Comments No. | Status (See Key) | Name        |
|--------------|------------------|-------------|
| 88662/15     | DO               | Phelps Bros |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) Noise standards should be incorporated into an appropriately worded policy or paragraph.

### Inspector's Reasoning and Conclusions

- 5.75.1 I agree with the suggestion in WPA 31a that the title above paragraph 5.122 be deleted so that paragraphs 5.122 to 5.129 are clearly understood to explain policy 36. I question whether a title or heading is needed to replace it, especially as "noise and vibration", "airborne emissions" and "odours" are sub headings.
- 5.75.2 I see paragraphs 5.122 to 5.125 as being informative to the public and to developers on noise. There are various types of sensitive receptors and circumstances vary from one site to another. I therefore feel that having the noise criteria in an informative paragraph without being over specific is helpful if they are relatively uncontentious (see section 5.76 of my report). As the policy title refers to sensitive properties and land uses, no further explanation seems necessary.

## RECOMMENDATION

- 5.75.3 Delete the title “LIKELY GENERATION OF NOISE, VIBRATION, ODOUR, FUMES AND DUST” above paragraph 5.122.

## 5.76 Paragraph 5.123

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/66     | DO               | Friends of the Earth (Gloucestershire) |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) Object to 10dB increase being considered acceptable.

### Inspector's Reasoning and Conclusions

- 5.76.1 I agree with FEG. There are occasions when an increase of 10dB in noise level is unnecessary and inappropriate. Noise characteristics can be complex and very intrusive. Key Objective 3 of the Plan seeks to preserve or enhance the overall quality of the environment and this part of the Plan seems to be in conflict with that aim. I do not feel that it is helpful to declare a level, even as a maximum, that equates from experience and analysis to complaints being likely, although I have sympathy with the WPA's attempt to set out clear guidance. However, because sites differ so much in character, I feel that the criteria proposed may not be in public interest in all cases. The figures given are not justified by clear explanation or evidence, even with reference to PPG24 (Planning and Noise) so I feel I must conclude that the figures should be omitted from this version of the Plan and that each planning application should be assessed on its merits regarding noise levels.

## RECOMMENDATIONS

- 5.76.2 Delete paragraph 5.124 and substitute, “For waste management operations noise attenuation measures are expected to be an integral part of any development. The aim should be to ensure that complaints are unlikely from the proposed facility.”
- 5.76.3 Amend the first line of paragraph 5.125 to read, “Measures to ensure that noise levels are constrained to a reasonable level could involve;”
- 5.76.4 Combine paragraphs 5.124 and 5.125 as amended and renumber succeeding paragraphs.

## 5.77 Paragraph 5.127

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/67     | DO               | Friends of the Earth (Gloucestershire) |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

- (i) Consider impacts on land uses and environmental quality beyond immediate neighbours.

## Inspector's Reasoning and Conclusions

5.77.1 I agree with FEG. It is right that all the material environmental impacts should be considered for every waste development proposal. This will include any impacts beyond the immediate surroundings if they are likely to occur. While the Environment Agency will regulate the incineration process, the WPA will regulate the land-use impacts when planning permission is sought and if there is any breach of planning control. I suggest a slight modification to paragraph 5.127 to reflect that position and my understanding of national policies.

## RECOMMENDATION

5.77.2 Paragraph 5.127 line 5 delete "on neighbouring land uses".

## 5.78 Policy 37 (Hours of Operation)

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/68     | DS               | Friends of the Earth (Gloucestershire) |
| 88662/16     | DO               | Phelps Bros                            |
| 62613/16     | DO               | Hempsted Residents Association         |
| 62542/1      | DO               | Environmental Services Assoc.          |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

- (i) Restrictions on hours of operation should not normally be imposed
- (ii) Industrial estates should not be exempt from controls on hours.
- (iii) Reword policy: ".....where waste management proposals would be likely to unacceptably affect the amenities of the occupiers of nearby dwellings, the waste planning authority will consider the need to impose a condition restricting hours of operation"

## Inspector's Reasoning and Conclusions

5.78.1 The WPA accepts that this policy could be improved along the lines broadly suggested by objectors. Although ESA seeks to dispense with controls as far as possible, and particularly on industrial estates, I believe discretion on hours controls is better left to the decision-maker at the time of a planning application when circumstances can be better judged because they vary so widely. If industrial estates have no controls over hours of operation as a matter of policy then this will be taken into account when applying the Development Plan. The GWLP does not have to state the policy which may not be common throughout the County. Moreover, if waste facilities are to be sited in relatively close proximity to housing or other sensitive receptors as is the case in Schedule 2 of GWLP, whether on industrial estates or not, then they either need to be of a low key character or have some controls over operations, perhaps including hours. Amenity may be residential or some other type, such as leisure or hospitals, and this should be reflected in the policy.

## RECOMMENDATION

5.78.2 Delete the text of policy 37 and substitute, "A condition restricting hours of operation of waste management facilities will be imposed where appropriate to protect amenity."

## 5.79 Policy 38 (Transport)

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/69     | DS               | Friends of the Earth (Gloucestershire) |
| 62569/43     | DS               | Environment Agency                     |
| 62008/3      | DS               | Railtrack Property Plc.                |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## 5.80 Policy 39 (Traffic)

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/70     | DS               | Friends of the Earth (Gloucestershire) |
| 88658/26     | DO               | Hannaford John                         |
| 88662/17     | DO               | Phelps Bros                            |
| 65900/7      | DO               | Cotswolds AONB Partnership             |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) The policy should protect the tranquillity of the Cotswold AONB and rural roads used for leisure.
- (ii) Transport assessments should only be required in appropriate circumstances.

### Inspector's Reasoning and Conclusions

- 5.80.1 Protection from harmful environmental impact is a stated aim of this policy. However, the County does have the special features of the AONB, the Cotswold Way and the National Cycle Network that need protection although leisure use needs to be balanced with other community needs for the highways. The explanatory text of paragraph 5.132 seems to be the best place to note this, including cross-reference to policy 26.
- 5.80.2 Guidance for Transport Assessments, referred to in PPG13, is to be published shortly. The degree of detail required under GWLP will depend upon the scale of the proposal. The extent of consultation will also depend upon the roads likely to be affected. I feel that this should be included in the explanatory text.

### RECOMMENDATIONS

#### 5.80.3 Amend paragraph 5.132 of the Plan by:

inserting after "and congestion." in line 3, "Specially designated areas giving the public access to the countryside need particular care such as the Cotswold AONB and its rural roads generally, Offa's Dyke Path, the Thames Path, and the Cotswold Way."

Adding to the end of the paragraph, "Guidance for Transport Assessments is referred to in PPG13 and related documents. The degree of detail required will depend upon the scale of the proposal. The extent of consultation will also depend upon the roads likely to be affected."

## 5.81 Policy 40 (Public Rights of Way)

## Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/71     | DS               | Friends of the Earth (Gloucestershire) |
| 65900/8      | DO               | Cotswolds AONB Partnership             |
| 89877/1      | DS               | Ramblers Association FoD Group         |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

- (i) Add to text "The status of rights of way which form part of designated routes such as the Cotswold Way, or link with such routes, will be fully taken into account."

## Inspector's Reasoning and Conclusions

- 5.81.1 The policy and its supporting text seems to me to highlight the importance of protecting, and going further by creating, rights of way. I see no need to implement the proposed amendment.

## RECOMMENDATION

- 5.81.2 No change to the Plan as a result of this objection.

## 5.82 Policy 41 (Reinstatement)

## Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/72     | DS               | Friends of the Earth (Gloucestershire) |
| 62009/7      | DO               | Government Office for the South West   |
| 88662/18     | DO               | Phelps Bros                            |
| 62005/20     | RDS              | Countryside Agency                     |
| 62009/2      | RDO              | Government Office for the South West   |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

## Summary of Objections

### Initial Deposit

- (i) Identify the quality of site reclamation more clearly
- (ii) Clarify that the policy refers to temporary use of land for waste management purposes.

### Revised Deposit

- (i) The text should be reworded in accordance with paragraph 14 of MPG 7

## Inspector's Reasoning and Conclusions

- 5.82.1 The **quality of land reclamation** is included in RDGWLP for agriculture (policy 32) but not for other uses. Please see section 5.59 of my report. I feel that policy 41 should make clear that a good environmental standard will be expected, and the land should retain its longer term potential as a resource, the principle for which is set out in MPG 7 paragraph 14. Sites could revert to agriculture or some other use. Although this guidance refers to minerals sites, the principle is one of sustainability and is just as applicable to waste sites.

The details of reinstatement requirements will depend on the circumstances prevailing at the time of the planning decision and any later applications for review.

- 5.82.2 The policy clearly concerns **temporary**, rather than permanent, permissions and I agree with Phelps Bros that it would be more logical to make it clear in the wording of the policy rather than to rely upon the supporting text.

## RECOMMENDATIONS

- 5.82.3 Amend the last sentence of policy 41 to read, “A good environmental standard will be expected that will reflect the character of the land as a valuable resource. Details of reinstatement requirements will be determined by the circumstances prevailing at the time of the planning decision and when any later applications for review are considered.”

- 5.82.4 In the first line of policy 41 insert “temporary” after “for”.

## 5.83 Policy 42 (After Use)

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/73     | DS               | Friends of the Earth (Gloucestershire) |
| 62013/1      | DS               | English Nature                         |
| 62569/29     | DO/W             | Environment Agency                     |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) — Policy should strictly require after use proposals to be submitted at the time of the application

## 5.84 Policy 44 (Planning Obligations)

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/74     | DS               | Friends of the Earth (Gloucestershire) |
| 61768/16     | DO               | Friends of the Earth (FoD)             |
| 65900/9      | DO               | Cotswolds AONB Partnership             |
| 62073/8      | DS               | Wiltshire County Council               |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) Include long-term management of habitats  
(ii) Delete reference to replacement of protected sites

## Inspector's Reasoning and Conclusions

- 5.84.1 This policy on matters for planning obligations includes habitat and species protection and creation and this seems adequate for the purpose.

- 5.84.2 This policy is not permitting or encouraging replacement of protected sites. That would need to be justified in the context of the protective policies of GWLP and other elements of the Development Plan. I see no need to amend the policy.

#### RECOMMENDATION

- 5.84.3 No change to policy 44 as a result of these objections.

#### 5.85 Paragraph 5.148

#### Comments

| Comments No. | Status (See Key) | Name               |
|--------------|------------------|--------------------|
| 62569/30     | DO/W             | Environment Agency |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

#### Summary of Objections

- (i) ~~Where appropriate the Environment Agency would like to be involved in the workings of the Liaison Committees.~~





## Chapter 6

### 6.1 General

#### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 62012/8      | DO               | Highways Agency                        |
| 62604/11     | DO               | Gloucestershire Health Authority NHS   |
| 88713/75     | DS               | Friends of the Earth (Gloucestershire) |
| 62604/12     | DO               | Gloucestershire Health Authority NHS   |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

#### Summary of Objections

- (i) Monitoring of health impacts should be included.
- (ii) Responsibility for monitoring and review needs to be stated.
- (iii) Traffic generation and site access for waste developments should be monitored for action.

#### Inspector's Reasoning and Conclusions

- 6.1.1 Monitoring of health impacts has been added to RDGWLP Table 6.1
- 6.1.2 Although RDGWLP Table 1.1 provides some information on responsibilities, which could include monitoring, they are not at all clear on this important issue. It would be more helpful, and make the Plan more effective, if monitoring and data provision responsibilities were spelled out more clearly in Table 6.1. Responsibility for review rests with the WPA and this could be spelled out simply in paragraph 6.3.
- 6.1.3 Monitoring of traffic generation and site access for waste developments has been included in Table 6.1 but the responsibilities for provision of this data and how it will be collated are unclear.

#### RECOMMENDATIONS

- 6.1.4 Insert monitoring and data provision responsibilities into Table 6.1.
- 6.1.5 Paragraph 6.3 line 1 after "used" insert "by the County Council".

### 6.2 Paragraph 6.2

#### Comments

| Comments No. | Status (See Key) | Name            |
|--------------|------------------|-----------------|
| 99020/13     | RDS              | Chaplin S M Mrs |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### 6.3 Table No 6.1

#### Comments

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|--|
| Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report |
|--|

| Comments No. | Status (See Key) | Name                    |
|--------------|------------------|-------------------------|
| 61938/2      | RDS              | Tewkesbury Town Council |

**Key:** *O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit*

## G1.1 Glossary

### Comments

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88713/14     | DO               | Friends of the Earth (Gloucestershire) |
| 62637/7      | DO/W             | Cory Environmental (Glos) Ltd          |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) ~~The definition for landraising is not accepted. The term landfill should be applied to 'above ground' infilling~~
- (ii) Object to BPEO being equated to Sustainable Waste Management.

### Inspector's Reasoning and Conclusions

G1.1.1 I address BPEO and sustainable waste management at section 2.10 of my report. BPEO seems properly defined in the glossary. Sustainable waste management seems too narrowly defined as FEG contends. It seems to me that reference to the objectives in the definition of sustainable development would avoid misunderstanding and unnecessary argument. They are set out at paragraph 2.1 of the Waste Strategy 2000 Part I. It needs to be recognised however in referring to the objectives, that the planning system can only deal with land-use aspects of sustainability. It is the way we manage our resources and the waste we produce that can make an important contribution to sustainable development (Waste Strategy 2000 Part I paragraph 2.3).

### RECOMMENDATIONS

- G1.1.2 Delete the definition of "Sustainable Waste Management System" and substitute; "A system of dealing with waste that supports the objectives of:
- Effective protection of the environment;
  - Prudent use of natural resources;
  - Social progress that recognises the needs of everyone;
  - High and stable levels of economic growth and employment."
- G1.1.2 Amend the definition of strategic sites as recommended at paragraph 4.10.13 of my report.
- G1.1.3 Amend the definition of Energy from Waste as recommended at paragraph 4.9.12 of my report.



## Appendix 5

### Comments

| Comments No. | Status (See Key) | Name                            |
|--------------|------------------|---------------------------------|
| 62569/31     | DO/W             | Environment Agency              |
| 88678/3      | DO               | Tufnell Town & Country Planning |
| 61775/5      | DO               | Prestbury Parish Council        |
| 89808/15     | DO               | Robert Hitchins Ltd             |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support; D= Deposit; R= Revised Deposit

### Summary of Objections

- (i) The contribution of all existing lawful sites should be included.
- (ii) Inclusion of private, small scale sewage works
- (iii) Phoenix House site profile conflicts with Appendix 5 on energy recovery.
- (iv) ~~Many significant facilities are excluded.~~

### Inspector's Reasoning and Conclusions

- A5.2 As the WPA says, the list of waste facilities needs to be updated as information becomes available. However, it is important that the data-base of waste facilities is correct because it forms a vital element in deciding whether arisings are being sustainably dealt with and where new waste development is needed. As I say at section 3.10 of my report, I am not confident that the RDGWLP reflects a sustainable network of facilities because the detailed information is not available at the moment to enable that assessment to be made.
- A5.3 I have sympathy with the WPA's point that it is impracticable to list every small facility, especially down to householders' compost heaps, but a sensible line needs to be drawn. As I have no evidence on the point I prefer to leave that judgement to the WPA in consultation with operators and other authorities. I have mentioned the important point of the information.
- A5.4 The Phoenix House conflict needs to be cleared up. A note on the title page of Appendix 5 could indicate that the facilities are described by their permitted uses. The Site Profile for Phoenix House should make clear that energy recovery is not presently being employed.
- A5.5 The WPA accepts that Wilderness Quarry is wrongly omitted from the list of waste transfer stations.

### RECOMMENDATIONS

- A5.6 Add a note to the title page of Appendix 5 of the Plan to read "Waste Facilities are described according to their permitted uses known when the Plan was being compiled. However, changes will occur over the period of the Plan. The County Council maintains an updated record of facilities."
- A5.7 No change to the entry for Phoenix House in the Glossary, but see section 4.33 of my report for a change to the Site Profile.
- A5.8 Add Wilderness Quarry to the list of waste transfer stations in Appendix 5.



## APPENDIX 1: LISTS OF OBJECTORS AND SUPPORTERS

**Figure 1: General**

### Comments

| Comments No. | Status (See Key) | Name                                      |
|--------------|------------------|---|
| 88532/2      | DO               | Elworthy Joy                              |
| 88532/3      | DO               | Elworthy Joy                              |
| 88588/2      | DO/W             | Martin David                              |
| 63039/3      | DS               | Vision 21 Waste & Pollution Working Group |
| 66841/2      | DO               | Funnell Mr and Mrs                        |
| 88649/1      | DO               | Mackie-Forrest G                          |
| 88400/1      | DO               | Blount J D Mr                             |
| 88402/1      | DO               | Ogilvie J                                 |
| 88404/1      | DO               | James Sian Ms                             |
| 88403/1      | DO               | Young Gordon Mr                           |
| 88398/9      | DO               | White Margaret                            |
| 88398/1      | DO               | White Margaret                            |
| 88396/1      | DO               | Smith Carla                               |
| 88395/1      | DO               | Fletcher B A Ms                           |
| 88394/1      | DO               | Lindop Jenny                              |
| 88393/1      | DO               | Parker Barbara G B                        |
| 88528/1      | DO               | Redmond D                                 |
| 88417/2      | DS               | Gloucestershire Royal NHS Trust           |
| 88656/2      | DO               | Thornett-Roston M                         |
| 88656/1      | DO               | Thornett-Roston M                         |
| 61833/1      | DS               | Charlton Kings Parish Council             |
| 88633/1      | DO               | Schonbeck Walter                          |
| 88634/1      | DO               | Thornton M M                              |
| 88637/3      | DO               | Gillett D J                               |
| 88713/76     | DO               | Friends of the Earth (Gloucestershire)    |
| 88399/1      | DO               | Daunt Marian Mrs                          |
| 88713/2      | DO               | Friends of the Earth (Gloucestershire)    |
| 88713/1      | DO               | Friends of the Earth (Gloucestershire)    |
| 88906/1      | DO               | Etheridge M Mrs                           |
| 88936/1      | DO               | Howell John J                             |
| 89047/1      | DO               | Sweeting Margaret M                       |
| 62009/1      | DO               | Government Office for the South West      |
| 88631/3      | DO               | Christmas E G                             |
| 88631/1      | DO               | Christmas E G                             |
| 88938/1      | DO               | Burrough J S & W                          |
| 88937/1      | DO               | Britton Maria                             |
| 88935/1      | DO               | Davies C A & K                            |
| 89046/1      | DO               | Robinson L                                |
| 89040/1      | DO               | West Christopher                          |
| 89037/1      | DO               | Smith Duncan                              |
| 89035/1      | DO               | Veray D A Mrs                             |
| 89033/1      | DO               | Hayne R V                                 |
| 88913/1      | DO/W             | Goldring D                                |
| 88912/1      | DO               | Lewis H R Mr                              |
| 88911/1      | DO               | Sutton-Smith Deirdre                      |
| 88910/1      | DO               | Baldwin Paula L C                         |
| 88909/1      | DO               | Fletcher Leo                              |
| 88907/1      | DO               | Davies Jenefer                            |
| 89053/1      | DO               | Lewis Richard                             |

Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

|         |       |                                  |
|---------|-------|----------------------------------|
| 89011/1 | DO    | Kennedy Norah                    |
| 89051/1 | DO    | Hatton Irene Mrs                 |
| 89050/1 | DO    | Judd S Venn & Suzanne            |
| 89049/1 | DO    | Easton-Lawrence Sandra           |
| 89048/1 | DO    | Grendon J Mr                     |
| 88699/1 | DO    | Hogg A E Mrs                     |
| 88900/1 | DO    | Jackson D A Dr                   |
| 88903/1 | DO    | Camphill Village Trust           |
| 88919/1 | DO    | Jarvis R                         |
| 88918/9 | DO    | Haussherr A Miss                 |
| 88918/1 | DO    | Haussherr A Miss                 |
| 88917/1 | DO    | Palmer Joyce K                   |
| 88916/1 | DO    | Teague P R                       |
| 88915/1 | DO    | Sycamore Angela                  |
| 89712/2 | DO    | Pearson June                     |
| 89063/2 | DO    | Medcalf Hilary Mrs               |
| 89058/1 | DO    | Kelly S Mrs                      |
| 89057/1 | DO    | Marsh Nicola                     |
| 89056/9 | DO    | Jenner Mr & Mrs                  |
| 89056/1 | DO    | Jenner Mr & Mrs                  |
| 61945/1 | DS    | Cirencester Town Council         |
| 88881/2 | DO    | Gregory P R & M R                |
| 92199/1 | DLO   | Douglas Julie                    |
| 94638/1 | DLO   | Melvin L Mr                      |
| 90154/1 | DLO   | Denney Paul Cllr                 |
| 90052/1 | DLO   | Luckett M K                      |
| 89982/1 | DLO   | Rowson Fiona                     |
| 90099/1 | DLO   | Allan Christie                   |
| 90118/1 | DLO/W | Dabinett Jean Miss               |
| 90106/1 | DLO   | Hodge Jessica                    |
| 90138/1 | DLO   | Anonymous (Illegible Signature)  |
| 90126/1 | DLO   | Lloyd Amy Perry & Julian         |
| 90678/1 | DLO   | Clemeson Hilary                  |
| 90134/1 | DLO   | Croxall Elinor                   |
| 89824/2 | DLO   | Phillips R A Mr                  |
| 90067/2 | DLO   | Jones Kate Webb & Len            |
| 90174/2 | DLO   | Evans Jonathan & Gillian         |
| 89772/1 | DLO   | Barr Jerry Mr                    |
| 89771/1 | DLO   | Rickette H Mrs                   |
| 89769/1 | DLO   | Brown G K                        |
| 89767/1 | DLO   | Churchill Robert Mr              |
| 89766/1 | DLO   | Westbrook S E Ms                 |
| 89804/1 | DLO   | Veray Chris                      |
| 89752/1 | DLO   | Beloe Catherine                  |
| 89750/2 | DLO   | Neale A R Mr & Mrs               |
| 90115/2 | DLO   | Spreag Robin Mr                  |
| 89760/9 | DLO   | Mildmay Crystal                  |
| 89760/1 | DLO/W | Mildmay Crystal                  |
| 89763/1 | DLO/W | Pealing S Mr                     |
| 89764/1 | DLO   | Greenman Peter Thomas & Felicity |
| 89751/9 | DLO   | Mate R & J Mr & Mrs              |
| 89751/1 | DLO   | Mate R & J Mr & Mrs              |
| 89755/1 | DLO   | Benn Kevin Mr                    |
| 62680/5 | DO    | Furniss Brian Mr                 |
| 62680/4 | DO    | Furniss Brian Mr                 |
| 62680/3 | DO    | Furniss Brian Mr                 |
| 62680/2 | DO    | Furniss Brian Mr                 |
| 89833/1 | DLO   | Haseler C                        |



Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

|         |      |  |
|---------|------|--|
| 89727/3 | DO   | National Council of Women (Cheltenham) |
| 89727/1 | DS   | National Council of Women (Cheltenham) |
| 89744/1 | DO   | Jones R L Mr                           |
| 62604/4 | DO   | Gloucestershire Health Authority NHS   |
| 62604/3 | DO   | Gloucestershire Health Authority NHS   |
| 62604/2 | DO   | Gloucestershire Health Authority NHS   |
| 62604/1 | DS   | Gloucestershire Health Authority NHS   |
| 62043/8 | DO   | Gloucester City Council                |
| 62042/2 | DO   | Cotswold District Council              |
| 62042/1 | DS   | Cotswold District Council              |
| 62055/1 | DS   | Warwickshire County Council            |
| 88902/1 | DO   | Brewster D G Mrs                       |
| 88825/4 | DO   | Weyers Janet                           |
| 88825/2 | DO   | Weyers Janet                           |
| 61891/3 | DO   | Stinchcombe Parish Council             |
| 61891/1 | DS   | Stinchcombe Parish Council             |
| 89002/1 | DO   | Atterbury Clive Perkins & Janet        |
| 88894/4 | DO   | Holmes Andrew                          |
| 88894/2 | DO   | Holmes Andrew                          |
| 88756/3 | DO   | Living Green Centre                    |
| 88756/1 | DS   | Living Green Centre                    |
| 66208/1 | DS   | Inland Waterways Association           |
| 88752/1 | DO   | Avery Cheryl                           |
| 88684/2 | DO   | Kelham Betty Ms                        |
| 89745/1 | DO   | Cantwell M Mr                          |
| 89713/1 | DO   | Carpenter Barbara                      |
| 61768/5 | DO   | Friends of the Earth (FoD)             |
| 89714/1 | DO   | Ginns Philippa                         |
| 88180/1 | DO   | Hicks G K Mrs                          |
| 61785/1 | DS   | Daglingworth Parish Council            |
| 86934/1 | DO   | Environment & Ecology Forum            |
| 62746/1 | DS   | Raven N H Mr                           |
| 61613/1 | DS   | Dumbleton Parish Council               |
| 86933/1 | DO   | Gosling Lydia                          |
| 86846/1 | DO   | Morgan R Mr and Mrs                    |
| 63736/1 | DS   | Gleed E Mrs                            |
| 86847/1 | DS   | Pennington (Hon Ald) J Mr              |
| 88034/1 | DO   | Jones R M                              |
| 87953/1 | DO   | Ryder Jane & Martin                    |
| 62613/3 | DO   | Hempsted Residents Association         |
| 62613/2 | DO   | Hempsted Residents Association         |
| 62613/1 | DO   | Hempsted Residents Association         |
| 61913/1 | DO   | Brockworth Parish Council              |
| 87947/1 | DO   | Rose Henrietta & Nick                  |
| 87944/1 | DO   | Crosby Claire Dr                       |
| 87939/1 | DO   | Tovey Diana M.                         |
| 87930/1 | DO   | Fryer W L Mr                           |
| 87965/1 | DO   | Marshall A D                           |
| 61610/1 | DS   | Minsterworth Parish Council            |
| 62012/9 | DO/W | Highways Agency                        |
| 87902/1 | DO/W | Harvey Jonathan                        |
| 61830/1 | DS   | Walton Cardiff Parish Meeting          |
| 62005/1 | RDS  | Countryside Agency                     |
| 90096/2 | DLO  | Rice Phil Mr                           |
| 95069/1 | DLO  | Sutton J Ms                            |
| 95045/1 | DLO  | James S M Mrs                          |
| 94947/1 | DLO  | Bryan Oda Thekla Mrs                   |
| 61921/6 | DLO  | Bishops Cleeve Parish Council          |

Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

|         |     |                                      |
|---------|-----|--------------------------------------|
| 90087/1 | DLO | Linnett Mike Mr                      |
| 90096/5 | DLO | Rice Phil Mr                         |
| 90096/4 | DLO | Rice Phil Mr                         |
| 90096/3 | DLO | Rice Phil Mr                         |
| 90090/1 | DLO | Watterston Dip LA C Ms               |
| 61752/1 | DLO | Brimpsfield Parish Council           |
| 91523/1 | DLO | Ruchbrooke J J                       |
| 61613/1 | RDS | Dumbleton Parish Council             |
| 95573/9 | DLO | Lukas Catherine H                    |
| 95573/1 | DLO | Lukas Catherine H                    |
| 89715/1 | DO  | Ginns Elisabeth                      |
| 88684/1 | DO  | Kelham Betty Ms                      |
| 89726/4 | DO  | Lister Janet Ms                      |
| 89726/3 | DO  | Lister Janet Ms                      |
| 89726/2 | DO  | Lister Janet Ms                      |
| 89711/5 | DO  | Taylor J V Mrs                       |
| 89711/3 | DO  | Taylor J V Mrs                       |
| 89729/1 | DO  | Lock J C Mr & Mrs                    |
| 88079/3 | DO  | Eley R S Mr                          |
| 88820/2 | DO  | Melcourt Industries Ltd              |
| 88820/1 | DS  | Melcourt Industries Ltd              |
| 66406/1 | DO  | Brassington A. R. Mr                 |
| 88821/1 | DO  | S.M.I.L.E                            |
| 88891/1 | DO  | Billings-Ferrand Jaqueline A The Hon |
| 88891/2 | DO  | Billings-Ferrand Jaqueline A The Hon |
| 89063/1 | DO  | Medcalf Hilary Mrs                   |
| 89055/1 | DO  | Simonon Lin                          |
| 89054/1 | DO  | Goodenough A S                       |
| 89008/1 | DO  | Hunt Alison J                        |
| 89001/1 | DO  | Colson A J                           |
| 89000/1 | DS  | Moggridge Hal                        |
| 88819/1 | DO  | Lezard T W J                         |
| 88942/1 | DO  | Crabb West, Lawlor &                 |
| 88940/1 | DO  | Thornhill Alan                       |
| 88621/1 | DO  | How E A Mrs                          |
| 88600/1 | DO  | Richardson A                         |
| 88653/1 | DO  | Fromly S D                           |
| 88652/1 | DO  | Grimster J A                         |
| 88651/1 | DO  | Brice Sheila J M                     |
| 65393/8 | DO  | Cypher S N Mr                        |
| 65393/1 | DO  | Cypher S N Mr                        |
| 88186/3 | DO  | Adams Paul                           |
| 88186/2 | DO  | Adams Paul                           |
| 88190/4 | DO  | Parfitt Alison                       |
| 88190/2 | DO  | Parfitt Alison                       |
| 88190/1 | DO  | Parfitt Alison                       |
| 88386/1 | DO  | Ramsden Keith                        |
| 88384/1 | DO  | French Rheema                        |
| 88383/1 | DO  | McManns A & H                        |
| 88382/1 | DO  | Hawkins W H                          |
| 88363/1 | DO  | Redmond G Mrs                        |
| 88362/1 | DO  | Evans S M                            |
| 88361/1 | DO  | Humble S Mrs                         |
| 88360/1 | DO  | Oakley Judith                        |
| 88359/1 | DO  | Bennett B                            |
| 88358/1 | DO  | Hawkes John & Maxine                 |
| 88357/1 | DO  | O'Halloran Simon J K                 |
| 88356/1 | DO  | Deproost Steven                      |

Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

|          |      |                                |
|----------|------|--------------------------------|
| 88378/1  | DO   | Hejedus Christina              |
| 88377/1  | DO   | Wiltshire Richard              |
| 88376/1  | DO   | Occupier The                   |
| 88375/1  | DO   | Lucas J                        |
| 88374/1  | DO   | Hudson A Mrs                   |
| 88373/1  | DO   | Jeldin D                       |
| 88371/1  | DO/W | Sawtell J R                    |
| 88370/1  | DO   | Claridge Patricia              |
| 88369/1  | DO/W | Brinkworth M                   |
| 88368/1  | DO   | Hatter Bridgette               |
| 88367/1  | DO   | Bellamy P                      |
| 88365/1  | DO   | Powell-Tuck T                  |
| 88138/1  | DO   | Sawdon B                       |
| 62613/40 | DO   | Hempsted Residents Association |
| 62613/39 | DO   | Hempsted Residents Association |
| 62613/38 | DO   | Hempsted Residents Association |
| 62613/37 | DO/C | Hempsted Residents Association |
| 62613/36 | DO   | Hempsted Residents Association |
| 62613/35 | DO   | Hempsted Residents Association |
| 62613/32 | DO   | Hempsted Residents Association |
| 62613/29 | DO   | Hempsted Residents Association |
| 62613/26 | DO   | Hempsted Residents Association |
| 62613/22 | DO   | Hempsted Residents Association |
| 62613/21 | DO   | Hempsted Residents Association |
| 62613/20 | DO   | Hempsted Residents Association |
| 88392/1  | DO   | Pagan Jane                     |
| 88391/1  | DO   | Shott R Mr                     |
| 88389/1  | DO   | Keeling P Mr                   |
| 88388/1  | DO   | Richardson W L                 |
| 88381/1  | DO   | Wiltshire S                    |
| 88380/1  | DO   | Wiltshire Melanie J            |
| 88152/1  | DO   | Cordery Peter                  |
| 88151/9  | DO   | Perry G                        |
| 88151/1  | DO   | Perry G                        |
| 88150/1  | DO   | Withnell H Miss                |
| 88149/1  | DO   | Henstock P L                   |
| 88146/1  | DO   | Varah W O Mr & Mrs             |
| 88145/1  | DO   | Robinson Joy Mrs               |
| 88144/1  | DO   | Tweedy M J Ms                  |
| 88143/1  | DO/W | Ibbotson H Mrs                 |
| 88142/1  | DO   | Coleman J Mr                   |
| 88141/1  | DO   | Williams Liz                   |
| 88140/1  | DO   | McCubbins G                    |
| 88139/10 | DO   | Housden Helen C Mrs            |
| 88139/8  | DO   | Housden Helen C Mrs            |
| 88139/1  | DO   | Housden Helen C Mrs            |
| 88164/1  | DO   | Van Boeschoteu M Mrs           |
| 88163/1  | DO   | Baylis T Ms                    |
| 88162/4  | DO   | Yearsley J V                   |
| 88161/1  | DO   | Ross E Mrs                     |
| 88160/1  | DO   | Fielding A W T Mr & Mrs        |
| 88158/1  | DO   | Allison James                  |
| 88157/1  | DO   | Crabb Elsie                    |
| 88156/1  | DO   | Pardoe R                       |
| 88155/1  | DO   | Williams Ursula                |
| 88154/1  | DO   | Harding U C                    |
| 88153/1  | DO/W | Fanthorpe & Dr R V Bailey U A  |
| 62613/50 | DO   | Hempsted Residents Association |

Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

|          |      |                                |
|----------|------|--------------------------------|
| 62613/49 | DO   | Hempsted Residents Association |
| 62613/48 | DO   | Hempsted Residents Association |
| 62613/47 | DO   | Hempsted Residents Association |
| 62613/46 | DO   | Hempsted Residents Association |
| 62613/45 | DO   | Hempsted Residents Association |
| 62613/44 | DO   | Hempsted Residents Association |
| 62613/43 | DO   | Hempsted Residents Association |
| 62613/42 | DO   | Hempsted Residents Association |
| 62613/41 | DO   | Hempsted Residents Association |
| 62613/19 | DO   | Hempsted Residents Association |
| 62613/18 | DO   | Hempsted Residents Association |
| 88042/1  | DO   | Faulkner Claire                |
| 88167/6  | DO   | Tibbles R W Mr                 |
| 88167/1  | DO   | Tibbles R W Mr                 |
| 88172/1  | DO/W | Keddle G                       |
| 88171/1  | DO   | Weavers B J Dr                 |
| 88170/1  | DO   | Wiltshire Corinna Mrs          |
| 88169/1  | DO   | Kitson E G Mrs                 |
| 88168/1  | DO   | Ochala A                       |
| 88166/1  | DO   | Cook L W Mr & Mrs              |
| 88165/1  | DO   | Daniels Liz                    |
| 88050/1  | DO/W | Dawson Bryan and Margaret      |
| 88051/1  | DO   | Smith Audrey                   |
| 88052/1  | DO   | Mehta Rob & Jehanne            |
| 88055/1  | DO   | Shenwell D D                   |
| 88059/1  | DO   | Kromm Kathy                    |
| 88061/1  | DO   | Govier M F                     |
| 88063/1  | DO   | Gregg C Mr                     |
| 88064/1  | DO   | Shaw-Maslin Sarah              |
| 88065/1  | DO   | Gunning Mrs                    |
| 88067/1  | DO   | Edgington S                    |
| 88066/1  | DO   | Shelley E Mrs                  |
| 62747/4  | DO   | Lavell C Miss                  |
| 62747/2  | DO   | Lavell C Miss                  |
| 88039/1  | DO   | Paget Keith                    |
| 88038/1  | DO   | Morris B D Mr & Mrs            |
| 88043/1  | DO   | Radford Ben                    |
| 88044/1  | DO   | King E M Mrs                   |
| 88022/1  | DO   | Grey A J                       |
| 88020/1  | DO   | Mowforth C W Dr                |
| 88024/1  | DO   | Jenkins E Miss                 |
| 88040/1  | DO   | Richards Alex R                |
| 88045/1  | DO   | Roberts P J Mrs                |
| 88046/1  | DO   | Lovegrove Martin               |
| 88047/1  | DO   | Bilbrough H G Mr               |
| 88048/1  | DO   | Coleman Ron                    |
| 88179/9  | DO   | Palmer Anna                    |
| 88077/2  | DO   | Wheen M M Mrs                  |
| 88179/1  | DO   | Palmer Anna                    |
| 88178/1  | DO   | Steeves-Booker Jill & Alan     |
| 88177/1  | DO   | Dickenson L                    |
| 88176/9  | DO   | Lane D A Ms                    |
| 88176/1  | DO   | Lane D A Ms                    |
| 88175/1  | DO   | Relton Maxine                  |
| 88174/1  | DO   | Marsh J M Mrs                  |
| 88173/1  | DO   | Wyndham C Ms                   |
| 88026/1  | DO   | Selwood H Mrs                  |
| 88030/1  | DO   | Hards Sarah                    |

# Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

|         |      |  |
|---------|------|--|
| 88033/1 | DO/W | Guillebaud O H F                       |
| 88035/1 | DO   | Johnson P E Mrs                        |
| 87950/1 | DO/W | Wyatt John                             |
| 87949/1 | DO   | Fernyhough A Mrs                       |
| 88135/1 | DO   | Coulton David                          |
| 88185/1 | DO   | Williams A H                           |
| 88184/1 | DO   | Stephens Joan E Mrs                    |
| 88183/1 | DO   | Passey J Mrs                           |
| 88182/1 | DO   | Pritchard G P Mr                       |
| 88181/1 | DO   | Blencowe L Mrs                         |
| 89028/1 | DO   | Langridge E Mrs                        |
| 89026/1 | DO   | Seeley R Ms                            |
| 89023/1 | DO   | Wedgbury Kay Ms                        |
| 88883/1 | DS   | Tucker P W Mr & Mrs                    |
| 89022/1 | DS   | Corcoran D J                           |
| 89018/1 | DO   | Barnyard J & M R                       |
| 89015/1 | DO   | Wright A R Mrs                         |
| 89014/1 | DO   | Rasien H                               |
| 88638/2 | DO   | Price B J Mr                           |
| 88713/3 | DO   | Friends of the Earth (Gloucestershire) |
| 88405/1 | DO   | Poyser Sara A                          |
| 88401/1 | DO   | Cambray E A Mrs                        |
| 88650/1 | DO   | Forrest G                              |
| 88647/1 | DO   | Coleman G Mrs                          |
| 88645/1 | DO   | Carr Jane                              |
| 88645/9 | DO   | Carr Jane                              |
| 88646/1 | DO   | Glenny Michael                         |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support  
D= Deposit; R= Revised Deposit

## Figure 2: Chapter 2 – Paragraph 2.13

### Comments

| Comments No. | Status (See Key) | Name             |
|--------------|------------------|------------------|
| 88645/2      | DS               | Carr Jane        |
| 88637/1      | DS               | Gillett D J      |
| 88398/2      | DS               | White Margaret   |
| 88405/2      | DS               | Poyser Sara A    |
| 88404/2      | DS               | James Sian Ms    |
| 88403/2      | DS               | Young Gordon Mr  |
| 88402/2      | DS               | Ogilvie J        |
| 88401/2      | DS               | Cambray E A Mrs  |
| 88400/2      | DS               | Blount J D Mr    |
| 88650/2      | DS               | Forrest G        |
| 88649/2      | DS               | Mackie-Forrest G |
| 88653/2      | DS               | Fromly S D       |
| 88652/2      | DS               | Grimster J A     |
| 88651/2      | DS               | Brice Sheila J M |
| 65393/3      | DO               | Cypher S N Mr    |
| 88388/2      | DS               | Richardson W L   |
| 88386/2      | DS               | Ramsden Keith    |
| 88384/2      | DS               | French Rheema    |
| 88383/2      | DS               | McManns A & H    |

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| Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report |
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|         |     |                                   |
|---------|-----|-----------------------------------|
| 88382/2 | DS  | Hawkins W H                       |
| 88363/2 | DS  | Redmond G Mrs                     |
| 88362/2 | DS  | Evans S M                         |
| 88361/2 | DS  | Humble S Mrs                      |
| 88360/2 | DS  | Oakley Judith                     |
| 88359/2 | DS  | Bennett B                         |
| 88358/2 | DS  | Hawkes John & Maxine              |
| 88357/2 | DS  | O'Halloran Simon J K              |
| 88356/2 | DS  | Deproost Steven                   |
| 88378/2 | DS  | Hejedus Christina                 |
| 88377/2 | DS  | Wiltshire Richard                 |
| 88376/2 | DS  | Occupier The                      |
| 88375/2 | DS  | Lucas J                           |
| 88374/2 | DS  | Hudson A Mrs                      |
| 88373/2 | DS  | Jeldin D                          |
| 88371/2 | DS  | Sawtell J R                       |
| 88370/2 | DS  | Claridge Patricia                 |
| 88369/2 | DS  | Brinkworth M                      |
| 88368/2 | DS  | Hatter Bridgette                  |
| 88367/2 | DS  | Bellamy P                         |
| 88365/2 | DS  | Powell-Tuck T                     |
| 88139/2 | DS  | Housden Helen C Mrs               |
| 61897/2 | DO  | Westbury On Severn Parish Council |
| 88392/2 | DS  | Pagan Jane                        |
| 88391/2 | DS  | Shott R Mr                        |
| 88389/2 | DS  | Keeling P Mr                      |
| 88381/2 | DS  | Wiltshire S                       |
| 88380/2 | DS  | Wiltshire Melanie J               |
| 88152/2 | DS  | Cordery Peter                     |
| 88151/2 | DS  | Perry G                           |
| 88150/2 | DS  | Withnell H Miss                   |
| 88149/2 | DS  | Henstock P L                      |
| 88146/2 | DS  | Varah W O Mr & Mrs                |
| 88145/2 | DS  | Robinson Joy Mrs                  |
| 88144/2 | DS  | Tweedy M J Ms                     |
| 88143/2 | DS  | Ibbotson H Mrs                    |
| 88142/2 | DS  | Coleman J Mr                      |
| 88141/2 | DS  | Williams Liz                      |
| 88140/2 | DS  | McCubbins G                       |
| 88164/2 | DS  | Van Boeschoteu M Mrs              |
| 88163/2 | DS  | Baylis T Ms                       |
| 88162/2 | DS  | Yearsley J V                      |
| 88161/2 | DS  | Ross E Mrs                        |
| 88160/2 | DS  | Fielding A W T Mr & Mrs           |
| 88158/2 | DS  | Allison James                     |
| 88157/2 | DS  | Crabb Elsie                       |
| 88156/2 | DS  | Pardoe R                          |
| 88155/2 | DS  | Williams Ursula                   |
| 88154/2 | DS  | Harding U C                       |
| 88153/2 | DS  | Fanthorpe & Dr R V Bailey U A     |
| 99020/3 | RDO | Chaplin S M Mrs                   |
| 99020/2 | RDO | Chaplin S M Mrs                   |
| 62637/1 | RDS | Cory Environmental (Glos) Ltd     |
| 62005/4 | RDO | Countryside Agency                |
| 62005/3 | RDO | Countryside Agency                |
| 62005/2 | RDO | Countryside Agency                |
| 62063/2 | RDS | Swindon Borough Council           |
| 62063/1 | RDS | Swindon Borough Council           |

Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

|          |      |   |
|----------|------|---|
| 61775/1  | RDO  | Prestbury Parish Council                |
| 95573/2  | DLS  | Lukas Catherine H                       |
| 95069/2  | DLS  | Sutton J Ms                             |
| 95045/2  | DLS  | James S M Mrs                           |
| 94947/2  | DLS  | Bryan Oda Thekla Mrs                    |
| 90096/8  | DLO  | Rice Phil Mr                            |
| 90096/6  | DLO  | Rice Phil Mr                            |
| 62063/3  | DS   | Swindon Borough Council                 |
| 61991/1  | DLO  | DEFRA (Formerly FRCA on behalf of MAFF) |
| 91523/2  | DLS  | Ruchbrooke J J                          |
| 94638/2  | DLS  | Melvin L Mr                             |
| 90052/2  | DLS  | Lockett M K                             |
| 89982/2  | DLS  | Rowson Fiona                            |
| 90099/2  | DLS  | Allan Christie                          |
| 90118/2  | DLS  | Dabinett Jean Miss                      |
| 90106/2  | DLS  | Hodge Jessica                           |
| 90138/2  | DLS  | Anonymous (Illegible Signature)         |
| 90126/2  | DLS  | Lloyd Amy Perry & Julian                |
| 90678/2  | DLS  | Clemeson Hilary                         |
| 90134/2  | DLS  | Croxall Elinor                          |
| 89764/2  | DLS  | Greenman Peter Thomas & Felicity        |
| 89772/2  | DLS  | Barr Jerry Mr                           |
| 89771/2  | DLS  | Rickette H Mrs                          |
| 89769/2  | DLS  | Brown G K                               |
| 89767/2  | DLS  | Churchill Robert Mr                     |
| 89766/2  | DLS  | Westbrook S E Ms                        |
| 89804/2  | DLS  | Verey Chris                             |
| 89752/2  | DLS  | Beloe Catherine                         |
| 89760/2  | DLS  | Mildmay Crystal                         |
| 89763/2  | DLS  | Pealing S Mr                            |
| 89751/2  | DLS  | Mate R & J Mr & Mrs                     |
| 89755/2  | DLS  | Benn Kevin Mr                           |
| 89833/2  | DLS  | Haseler C                               |
| 88902/2  | DS   | Brewster D G Mrs                        |
| 89002/2  | DS   | Atterbury Clive Perkins & Janet         |
| 88894/1  | DS   | Holmes Andrew                           |
| 88879/2  | DS   | Irving R W                              |
| 88662/1  | DO   | Phelps Bros                             |
| 89745/2  | DS   | Cantwell M Mr                           |
| 89713/2  | DS   | Carpenter Barbara                       |
| 89714/2  | DS   | Ginns Philippa                          |
| 89715/2  | DS   | Ginns Elisabeth                         |
| 89711/1  | DO   | Taylor J V Mrs                          |
| 89063/3  | DS   | Medcalf Hilary Mrs                      |
| 89058/2  | DS   | Kelly S Mrs                             |
| 89057/2  | DS   | Marsh Nicola                            |
| 89056/2  | DS   | Jenner Mr & Mrs                         |
| 62569/33 | DS   | Environment Agency                      |
| 88891/3  | DS   | Billings-Ferrand Jaqueline A The Hon    |
| 89051/2  | DS   | Hatton Irene Mrs                        |
| 89050/2  | DS   | Judd S Venn & Suzanne                   |
| 89049/2  | DS   | Easton-Lawrence Sandra                  |
| 89048/2  | DS   | Grendon J Mr                            |
| 62569/12 | DO/W | Environment Agency                      |
| 88935/2  | DS   | Davies C A & K                          |
| 88919/2  | DS   | Jarvis R                                |
| 88918/2  | DS   | Haussherr A Miss                        |
| 88917/2  | DS   | Palmer Joyce K                          |

Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

|         |    |                            |
|---------|----|----------------------------|
| 88916/2 | DS | Teague P R                 |
| 88915/2 | DS | Sycamore Angela            |
| 88913/2 | DS | Goldring D                 |
| 88912/2 | DS | Lewis H R Mr               |
| 88911/2 | DS | Sutton-Smith Deirdre       |
| 88910/2 | DS | Baldwin Paula L C          |
| 88909/2 | DS | Fletcher Leo               |
| 89053/2 | DS | Lewis Richard              |
| 89011/2 | DS | Kennedy Norah              |
| 89055/2 | DS | Simonon Lin                |
| 89054/2 | DS | Goodenough A S             |
| 89008/2 | DS | Hunt Alison J              |
| 89001/2 | DS | Colson A J                 |
| 89000/2 | DS | Moggridge Hal              |
| 88042/2 | DS | Faulkner Claire            |
| 88167/2 | DS | Tibbles R W Mr             |
| 88172/2 | DS | Keddl G                    |
| 88171/2 | DS | Weavers B J Dr             |
| 88170/2 | DS | Wiltshire Corinna Mrs      |
| 88169/2 | DS | Kitson E G Mrs             |
| 88168/2 | DS | Ochala A                   |
| 88166/2 | DS | Cook L W Mr & Mrs          |
| 88165/2 | DS | Daniels Liz                |
| 88050/2 | DS | Dawson Bryan and Margaret  |
| 88051/2 | DS | Smith Audrey               |
| 88052/2 | DS | Mehta Rob & Jehanne        |
| 88055/2 | DS | Shenwell D D               |
| 88059/2 | DS | Kromm Kathy                |
| 88061/2 | DS | Govier M F                 |
| 88063/2 | DS | Gregg C Mr                 |
| 88064/2 | DS | Shaw-Maslin Sarah          |
| 88065/2 | DS | Gunning Mrs                |
| 88067/2 | DS | Edgington S                |
| 88066/2 | DS | Shelley E Mrs              |
| 62747/1 | DS | Lavell C Miss              |
| 88039/2 | DS | Page Keith                 |
| 88038/2 | DS | Morris B D Mr & Mrs        |
| 88043/2 | DS | Radford Ben                |
| 88044/2 | DS | King E M Mrs               |
| 88022/2 | DS | Grey A J                   |
| 88020/2 | DS | Mowforth C W Dr            |
| 88024/2 | DS | Jenkins E Miss             |
| 88040/2 | DS | Richards Alex R            |
| 88045/2 | DS | Roberts P J Mrs            |
| 88046/2 | DS | Lovegrove Martin           |
| 88047/2 | DS | Bilbrough H G Mr           |
| 88048/2 | DS | Coleman Ron                |
| 88179/2 | DS | Palmer Anna                |
| 88178/2 | DS | Steeves-Booker Jill & Alan |
| 88177/2 | DS | Dickenson L                |
| 88176/2 | DS | Lane D A Ms                |
| 88175/2 | DS | Relton Maxine              |
| 88174/2 | DS | Marsh J M Mrs              |
| 88173/2 | DS | Wyndham C Ms               |
| 88026/2 | DS | Selwood H Mrs              |
| 88030/2 | DS | Hards Sarah                |
| 88033/2 | DS | Guillebaud O H F           |
| 88035/2 | DS | Johnson P E Mrs            |



Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

|          |    |  |
|----------|----|--|
| 87950/2  | DS | Wyatt John                             |
| 87949/2  | DS | Fernyhough A Mrs                       |
| 88138/2  | DS | Sawdon B                               |
| 88135/2  | DS | Coulton David                          |
| 88185/2  | DS | Williams A H                           |
| 88184/2  | DS | Stephens Joan E Mrs                    |
| 88183/2  | DS | Passey J Mrs                           |
| 88182/2  | DS | Pritchard G P Mr                       |
| 88181/2  | DS | Blencowe L Mrs                         |
| 88180/2  | DS | Hicks G K Mrs                          |
| 88034/2  | DS | Jones R M                              |
| 87953/2  | DS | Ryder Jane & Martin                    |
| 87947/2  | DS | Rose Henrietta & Nick                  |
| 87944/2  | DS | Crosby Claire Dr                       |
| 87939/2  | DS | Tovey Diana M.                         |
| 87930/2  | DS | Fryer W L Mr                           |
| 87965/2  | DS | Marshall A D                           |
| 88819/2  | DS | Lezard T W J                           |
| 88942/2  | DS | Crabb West, Lawlor &                   |
| 88940/2  | DS | Thornhill Alan                         |
| 88938/2  | DS | Burrough J S & W                       |
| 88937/2  | DS | Britton Maria                          |
| 89046/2  | DS | Robinson L                             |
| 89040/2  | DS | West Christopher                       |
| 89037/2  | DS | Smith Duncan                           |
| 89035/2  | DS | Verey D A Mrs                          |
| 89033/2  | DS | Hayne R V                              |
| 89023/2  | DS | Wedgbury Kay Ms                        |
| 89022/2  | DS | Corcoran D J                           |
| 89018/2  | DS | Bamyard J & M R                        |
| 89015/2  | DS | Wright A R Mrs                         |
| 89014/2  | DS | Rasien H                               |
| 88713/12 | DO | Friends of the Earth (Gloucestershire) |
| 88907/2  | DS | Davies Jenefer                         |
| 88906/2  | DS | Etheridge M Mrs                        |
| 88936/2  | DS | Howell John J                          |
| 89047/2  | DS | Sweeting Margaret M                    |
| 88399/2  | DS | Daunt Marian Mrs                       |
| 88396/2  | DS | Smith Carla                            |
| 88395/2  | DS | Fletcher B A Ms                        |
| 88394/2  | DS | Lindop Jenny                           |
| 89028/2  | DS | Langridge E Mrs                        |
| 89026/2  | DS | Seeley R Ms                            |
| 88393/2  | DS | Parker Barbara G B                     |
| 88646/2  | DS | Glenny Michael                         |
| 88647/2  | DS | Coleman G Mrs                          |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support  
D= Deposit; R= Revised Deposit

### Figure 3: Chapter 4 – General

#### Comments

| Comments No. | Status (See Key) | Name          |
|--------------|------------------|---------------|
| 88135/6      | DO               | Coulton David |

Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

|         |      |                               |
|---------|------|-------------------------------|
| 62041/7 | DO   | Stroud District Council       |
| 88153/7 | DO/W | Fanthorpe & Dr R V Bailey U A |
| 88138/3 | DO   | Sawdon B                      |
| 88138/6 | DO   | Sawdon B                      |
| 88139/5 | DO   | Housden Helen C Mrs           |
| 88140/3 | DO   | McCubbins G                   |
| 88140/5 | DO   | McCubbins G                   |
| 88140/6 | DO   | McCubbins G                   |
| 88142/5 | DO   | Coleman J Mr                  |
| 88176/6 | DO   | Lane D A Ms                   |
| 88177/3 | DO   | Dickenson L                   |
| 88177/7 | DO   | Dickenson L                   |
| 88178/6 | DO   | Steeves-Booker Jill & Alan    |
| 88179/3 | DO   | Palmer Anna                   |
| 88179/5 | DO   | Palmer Anna                   |
| 88180/7 | DO   | Hicks G K Mrs                 |
| 87950/3 | DO/W | Wyatt John                    |
| 87752/1 | DO   | Osborne Ann                   |
| 88034/3 | DO   | Jones R M                     |
| 88034/5 | DO   | Jones R M                     |
| 88034/6 | DO   | Jones R M                     |
| 88066/7 | DO   | Shelley E Mrs                 |
| 88067/3 | DO   | Edgington S                   |
| 88067/7 | DO   | Edgington S                   |
| 88046/6 | DO   | Lovegrove Martin              |
| 87930/7 | DO   | Fryer W L Mr                  |
| 87939/5 | DO   | Tovey Diana M.                |
| 87939/7 | DO   | Tovey Diana M.                |
| 87944/5 | DO   | Crosby Claire Dr              |
| 87944/6 | DO   | Crosby Claire Dr              |
| 87947/7 | DO   | Rose Henrietta & Nick         |
| 87949/7 | DO   | Fernyhough A Mrs              |
| 88942/5 | DO   | Crabb West, Lawlor &          |
| 88942/7 | DO   | Crabb West, Lawlor &          |
| 88819/6 | DO   | Lezard T W J                  |
| 88819/7 | DO   | Lezard T W J                  |
| 89000/5 | DS   | Moggridge Hal                 |
| 89000/6 | DS   | Moggridge Hal                 |
| 61756/1 | DO   | Andoversford Parish Council   |
| 88061/5 | DO   | Govier M F                    |
| 88915/7 | DO   | Sycamore Angela               |
| 88916/6 | DO   | Teague P R                    |
| 88916/7 | DO   | Teague P R                    |
| 88917/3 | DO   | Palmer Joyce K                |
| 88917/6 | DO   | Palmer Joyce K                |
| 88918/5 | DO   | Haussherr A Miss              |
| 88918/7 | DO   | Haussherr A Miss              |
| 88919/6 | DO   | Jarvis R                      |
| 88936/7 | DO   | Howell John J                 |
| 88906/6 | DO   | Etheridge M Mrs               |
| 88906/7 | DO   | Etheridge M Mrs               |
| 88907/5 | DO   | Davies Jenefer                |
| 88907/7 | DO   | Davies Jenefer                |
| 88909/6 | DO   | Fletcher Leo                  |
| 88909/7 | DO   | Fletcher Leo                  |
| 88910/3 | DO   | Baldwin Paula L C             |
| 88180/5 | DO   | Hicks G K Mrs                 |
| 88374/5 | DO   | Hudson A Mrs                  |

Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

|         |      |                         |
|---------|------|-------------------------|
| 88181/5 | DO   | Blencowe L Mrs          |
| 88361/5 | DO   | Humble S Mrs            |
| 88024/7 | DO   | Jenkins E Miss          |
| 88651/3 | DO   | Brice Sheila J M        |
| 88035/7 | DO   | Johnson P E Mrs         |
| 88651/6 | DO   | Brice Sheila J M        |
| 88356/7 | DO   | Deproost Steven         |
| 88177/6 | DO   | Dickenson L             |
| 89001/6 | DO   | Colson A J              |
| 89000/3 | DS   | Moggridge Hal           |
| 89008/3 | DO   | Hunt Alison J           |
| 89008/5 | DO   | Hunt Alison J           |
| 89008/6 | DO   | Hunt Alison J           |
| 89008/7 | DO   | Hunt Alison J           |
| 89011/3 | DO   | Kennedy Norah           |
| 89011/6 | DO   | Kennedy Norah           |
| 89014/6 | DO   | Rasien H                |
| 89014/7 | DO   | Rasien H                |
| 89015/3 | DO   | Wright A R Mrs          |
| 89015/6 | DO   | Wright A R Mrs          |
| 89015/7 | DO   | Wright A R Mrs          |
| 89018/6 | DO   | Bamyard J & M R         |
| 89022/3 | DO   | Corcoran D J            |
| 89023/6 | DO   | Wedgbury Kay Ms         |
| 89026/6 | DO   | Seeley R Ms             |
| 89026/7 | DO   | Seeley R Ms             |
| 89028/3 | DO   | Langridge E Mrs         |
| 89028/5 | DO   | Langridge E Mrs         |
| 89028/6 | DO   | Langridge E Mrs         |
| 89033/3 | DO   | Hayne R V               |
| 89033/6 | DO   | Hayne R V               |
| 89035/5 | DO   | Verrey D A Mrs          |
| 89035/7 | DO   | Verrey D A Mrs          |
| 88160/3 | DO   | Fielding A W T Mr & Mrs |
| 88160/6 | DO   | Fielding A W T Mr & Mrs |
| 88161/3 | DO   | Ross E Mrs              |
| 88162/3 | DO/W | Yearsley J V            |
| 88162/6 | DO/W | Yearsley J V            |
| 88163/6 | DO   | Baylis T Ms             |
| 88164/7 | DO   | Van Boeschoteu M Mrs    |
| 88165/3 | DO   | Daniels Liz             |
| 88165/6 | DO   | Daniels Liz             |
| 88166/5 | DO   | Cook L W Mr & Mrs       |
| 88168/5 | DO   | Ochala A                |
| 88168/7 | DO   | Ochala A                |
| 88169/5 | DO   | Kitson E G Mrs          |
| 88170/5 | DO   | Wiltshire Corinna Mrs   |
| 88170/6 | DO   | Wiltshire Corinna Mrs   |
| 88171/3 | DO   | Weavers B J Dr          |
| 88171/6 | DO   | Weavers B J Dr          |
| 88172/6 | DO/W | Kedde G                 |
| 88167/3 | DO   | Tibbles R W Mr          |
| 88042/6 | DO   | Faulkner Claire         |
| 88042/7 | DO   | Faulkner Claire         |
| 95069/7 | DLO  | Sutton J Ms             |
| 95069/3 | DLO  | Sutton J Ms             |
| 95069/5 | DLO  | Sutton J Ms             |
| 89833/5 | DLO  | Haseler C               |

Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

|          |      |                                   |
|----------|------|-----------------------------------|
| 89833/6  | DLO  | Haseler C                         |
| 89833/7  | DLO  | Haseler C                         |
| 62613/23 | DO   | Hempsted Residents Association    |
| 62613/24 | DO   | Hempsted Residents Association    |
| 61897/6  | DO/W | Westbury On Severn Parish Council |
| 62613/27 | DO   | Hempsted Residents Association    |
| 62613/30 | DO   | Hempsted Residents Association    |
| 62613/31 | DO   | Hempsted Residents Association    |
| 62613/34 | DO   | Hempsted Residents Association    |
| 62747/6  | DO   | Lavell C Miss                     |
| 88186/1  | DO   | Adams Paul                        |
| 88139/3  | DO   | Housden Helen C Mrs               |
| 88145/3  | DO   | Robinson Joy Mrs                  |
| 87947/3  | DO   | Rose Henrietta & Nick             |
| 88030/6  | DO   | Hards Sarah                       |
| 88368/7  | DO   | Hatter Bridgette                  |
| 88358/6  | DO   | Hawkes John & Maxine              |
| 88382/7  | DO   | Hawkins W H                       |
| 88378/6  | DO   | Hejedus Christina                 |
| 88358/3  | DO   | Hawkes John & Maxine              |
| 88067/6  | DO   | Edgington S                       |
| 88362/7  | DO   | Evans S M                         |
| 87949/6  | DO   | Fernyhough A Mrs                  |
| 88160/7  | DO   | Fielding A W T Mr & Mrs           |
| 88395/6  | DO   | Fletcher B A Ms                   |
| 88650/7  | DO   | Forrest G                         |
| 88384/7  | DO   | French Rheema                     |
| 87930/6  | DO   | Fryer W L Mr                      |
| 88646/7  | DO   | Glenny Michael                    |
| 88063/7  | DO   | Gregg C Mr                        |
| 88022/7  | DO   | Grey A J                          |
| 88645/5  | DO   | Carr Jane                         |
| 88370/5  | DO   | Claridge Patricia                 |
| 88647/5  | DO   | Coleman G Mrs                     |
| 88048/5  | DO   | Coleman Ron                       |
| 88152/5  | DO   | Cordery Peter                     |
| 88157/5  | DO   | Crabb Elsie                       |
| 88399/5  | DO   | Daunt Marian Mrs                  |
| 88050/5  | DO/W | Dawson Bryan and Margaret         |
| 88356/5  | DO   | Deproost Steven                   |
| 88177/5  | DO   | Dickenson L                       |
| 88067/5  | DO   | Edgington S                       |
| 88153/5  | DO/W | Fanthorpe & Dr R V Bailey U A     |
| 88042/5  | DO   | Faulkner Claire                   |
| 87949/5  | DO   | Fernyhough A Mrs                  |
| 88160/5  | DO   | Fielding A W T Mr & Mrs           |
| 88395/5  | DO   | Fletcher B A Ms                   |
| 88650/5  | DO   | Forrest G                         |
| 88653/5  | DO   | Fromly S D                        |
| 87930/5  | DO   | Fryer W L Mr                      |
| 88646/5  | DO   | Glenny Michael                    |
| 88022/5  | DO   | Grey A J                          |
| 88647/3  | DO   | Coleman G Mrs                     |
| 88142/3  | DO   | Coleman J Mr                      |
| 88166/3  | DO   | Cook L W Mr & Mrs                 |
| 88135/3  | DO   | Coulton David                     |
| 87944/3  | DO   | Crosby Claire Dr                  |
| 88362/3  | DO   | Evans S M                         |

Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

|         |      |  |
|---------|------|--|
| 88153/3 | DO/W | Fanthorpe & Dr R V Bailey U A          |
| 88042/3 | DO   | Faulkner Claire                        |
| 87949/3 | DO   | Fernyhough A Mrs                       |
| 88395/3 | DO   | Fletcher B A Ms                        |
| 88384/3 | DO   | French Rheema                          |
| 88653/3 | DO   | Fromly S D                             |
| 87930/3 | DO   | Fryer W L Mr                           |
| 88165/5 | DO   | Daniels Liz                            |
| 62604/5 | DS   | Gloucestershire Health Authority NHS   |
| 62604/7 | DO   | Gloucestershire Health Authority NHS   |
| 62604/8 | DO   | Gloucestershire Health Authority NHS   |
| 62604/9 | DO   | Gloucestershire Health Authority NHS   |
| 89727/2 | DO   | National Council of Women (Cheltenham) |
| 89826/2 | DO   | NMB Group Plc                          |
| 62055/2 | DO   | Warwickshire County Council            |
| 88365/7 | DO   | Powell-Tuck T                          |
| 88182/6 | DO   | Pritchard G P Mr                       |
| 88043/6 | DO   | Radford Ben                            |
| 88879/4 | DO   | Irving R W                             |
| 88894/3 | DO   | Holmes Andrew                          |
| 89002/3 | DO   | Atterbury Clive Perkins & Janet        |
| 89002/6 | DO   | Atterbury Clive Perkins & Janet        |
| 89002/7 | DO   | Atterbury Clive Perkins & Janet        |
| 61891/2 | DO   | Stinchcombe Parish Council             |
| 88898/1 | DO   | Vacara P                               |
| 88902/3 | DO   | Brewster D G Mrs                       |
| 88902/4 | DO   | Brewster D G Mrs                       |
| 88902/5 | DO   | Brewster D G Mrs                       |
| 61998/4 | DO/W | British Waterways                      |
| 89023/5 | DO   | Wedgbury Kay Ms                        |
| 88652/5 | DO   | Grimster J A                           |
| 88652/6 | DO   | Grimster J A                           |
| 88064/7 | DO   | Shaw-Maslin Sarah                      |
| 88063/3 | DO   | Gregg C Mr                             |
| 87965/3 | DO   | Marshall A D                           |
| 87965/5 | DO   | Marshall A D                           |
| 87965/6 | DO   | Marshall A D                           |
| 87953/3 | DO   | Ryder Jane & Martin                    |
| 87953/6 | DO   | Ryder Jane & Martin                    |
| 87953/7 | DO   | Ryder Jane & Martin                    |
| 88061/6 | DO   | Govier M F                             |
| 88059/5 | DO   | Kromm Kathy                            |
| 88055/7 | DO   | Shenwell D D                           |
| 88055/3 | DO   | Shenwell D D                           |
| 88052/7 | DO   | Mehta Rob & Jehanne                    |
| 88040/3 | DO   | Richards Alex R                        |
| 88040/5 | DO   | Richards Alex R                        |
| 88040/7 | DO   | Richards Alex R                        |
| 88024/6 | DO   | Jenkins E Miss                         |
| 88400/3 | DO   | Blount J D Mr                          |
| 88400/7 | DO   | Blount J D Mr                          |
| 88401/3 | DO   | Cambray E A Mrs                        |
| 88402/7 | DO   | Ogilvie J                              |
| 88403/3 | DO   | Young Gordon Mr                        |
| 88403/6 | DO   | Young Gordon Mr                        |
| 88404/5 | DO   | James Sian Ms                          |
| 88405/3 | DO   | Poyser Sara A                          |
| 88405/6 | DO   | Poyser Sara A                          |

Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

|         |     |   |
|---------|-----|---|
| 88405/7 | DO  | Poyser Sara A                             |
| 63039/2 | DO  | Vision 21 Waste & Pollution Working Group |
| 88645/3 | DO  | Carr Jane                                 |
| 88645/6 | DO  | Carr Jane                                 |
| 88645/7 | DO  | Carr Jane                                 |
| 88646/3 | DO  | Glenny Michael                            |
| 88646/6 | DO  | Glenny Michael                            |
| 88647/7 | DO  | Coleman G Mrs                             |
| 88649/6 | DO  | Mackie-Forrest G                          |
| 88650/3 | DO  | Forrest G                                 |
| 88650/6 | DO  | Forrest G                                 |
| 88651/5 | DO  | Brice Sheila J M                          |
| 88651/7 | DO  | Brice Sheila J M                          |
| 88652/3 | DO  | Grimster J A                              |
| 88652/7 | DO  | Grimster J A                              |
| 88653/6 | DO  | Fromly S D                                |
| 88653/7 | DO  | Fromly S D                                |
| 88637/2 | DO  | Gillett D J                               |
| 88633/2 | DO  | Schonbeck Walter                          |
| 88631/2 | DO  | Christmas E G                             |
| 95045/6 | DLO | James S M Mrs                             |
| 95069/6 | DLO | Sutton J Ms                               |
| 88936/3 | DO  | Howell John J                             |
| 88936/6 | DO  | Howell John J                             |
| 89037/6 | DO  | Smith Duncan                              |
| 89037/7 | DO  | Smith Duncan                              |
| 89040/6 | DO  | West Christopher                          |
| 89040/7 | DO  | West Christopher                          |
| 89046/5 | DO  | Robinson L                                |
| 89046/7 | DO  | Robinson L                                |
| 89047/6 | DO  | Sweeting Margaret M                       |
| 89047/7 | DO  | Sweeting Margaret M                       |
| 89048/5 | DO  | Grendon J Mr                              |
| 89049/5 | DO  | Easton-Lawrence Sandra                    |
| 89049/7 | DO  | Easton-Lawrence Sandra                    |
| 89050/3 | DO  | Judd S Venn & Suzanne                     |
| 89050/6 | DO  | Judd S Venn & Suzanne                     |
| 89050/7 | DO  | Judd S Venn & Suzanne                     |
| 89051/3 | DO  | Hatton Irene Mrs                          |
| 89051/6 | DO  | Hatton Irene Mrs                          |
| 89053/6 | DO  | Lewis Richard                             |
| 89053/7 | DO  | Lewis Richard                             |
| 89054/3 | DO  | Goodenough A S                            |
| 89054/6 | DO  | Goodenough A S                            |
| 89055/6 | DO  | Simonon Lin                               |
| 89056/3 | DO  | Jenner Mr & Mrs                           |
| 89056/6 | DO  | Jenner Mr & Mrs                           |
| 89056/7 | DO  | Jenner Mr & Mrs                           |
| 89057/6 | DO  | Marsh Nicola                              |
| 89058/3 | DO  | Kelly S Mrs                               |
| 89058/6 | DO  | Kelly S Mrs                               |
| 89063/6 | DO  | Medcalf Hilary Mrs                        |
| 88182/7 | DO  | Pritchard G P Mr                          |
| 88183/3 | DO  | Passey J Mrs                              |
| 88183/5 | DO  | Passey J Mrs                              |
| 88184/6 | DO  | Stephens Joan E Mrs                       |
| 88185/7 | DO  | Williams A H                              |
| 88135/5 | DO  | Coulton David                             |

Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

|         |      |                          |
|---------|------|--------------------------|
| 88142/6 | DO   | Coleman J Mr             |
| 88143/3 | DO/W | Ibbotson H Mrs           |
| 88143/7 | DO/W | Ibbotson H Mrs           |
| 88080/1 | DO   | Sanders Maria            |
| 88144/3 | DO   | Tweedy M J Ms            |
| 88146/3 | DO   | Varah W O Mr & Mrs       |
| 88146/6 | DO   | Varah W O Mr & Mrs       |
| 88146/7 | DO   | Varah W O Mr & Mrs       |
| 88154/3 | DO   | Harding U C              |
| 88154/6 | DO   | Harding U C              |
| 88155/3 | DO   | Williams Ursula          |
| 88155/6 | DO   | Williams Ursula          |
| 88156/7 | DO   | Pardoe R                 |
| 88157/3 | DO   | Crabb Elsie              |
| 88157/6 | DO   | Crabb Elsie              |
| 88158/5 | DO   | Allison James            |
| 88375/3 | DO   | Lucas J                  |
| 88375/7 | DO   | Lucas J                  |
| 88376/6 | DO   | Occupier The             |
| 88377/3 | DO   | Wiltshire Richard        |
| 88377/6 | DO   | Wiltshire Richard        |
| 88378/7 | DO   | Hejedus Christina        |
| 88380/3 | DO   | Wiltshire Melanie J      |
| 88380/5 | DO   | Wiltshire Melanie J      |
| 88381/7 | DO   | Wiltshire S              |
| 88382/3 | DO   | Hawkins W H              |
| 88382/6 | DO   | Hawkins W H              |
| 88383/7 | DO   | McManns A & H            |
| 88384/5 | DO   | French Rheema            |
| 88384/6 | DO   | French Rheema            |
| 88386/3 | DO   | Ramsden Keith            |
| 88386/5 | DO   | Ramsden Keith            |
| 88386/7 | DO   | Ramsden Keith            |
| 88389/6 | DO   | Keeling P Mr             |
| 88391/3 | DO   | Shott R Mr               |
| 88063/6 | DO   | Gregg C Mr               |
| 62748/1 | DO   | Ridlington A Mr          |
| 61775/3 | DO   | Prestbury Parish Council |
| 88064/3 | DO   | Shaw-Maslin Sarah        |
| 88064/5 | DO   | Shaw-Maslin Sarah        |
| 88064/6 | DO   | Shaw-Maslin Sarah        |
| 88391/6 | DO   | Shott R Mr               |
| 88393/3 | DO   | Parker Barbara G B       |
| 88393/6 | DO   | Parker Barbara G B       |
| 88393/7 | DO   | Parker Barbara G B       |
| 88394/7 | DO   | Lindop Jenny             |
| 88395/7 | DO   | Fletcher B A Ms          |
| 88396/7 | DO   | Smith Carla              |
| 88398/3 | DO   | White Margaret           |
| 88398/5 | DO   | White Margaret           |
| 88399/3 | DO   | Daunt Marian Mrs         |
| 88399/7 | DO   | Daunt Marian Mrs         |
| 88381/5 | DO   | Wiltshire S              |
| 88173/5 | DO   | Wyndham C Ms             |
| 88162/5 | DO/W | Yearsley J V             |
| 88403/5 | DO   | Young Gordon Mr          |
| 88401/5 | DO   | Cambray E A Mrs          |
| 88401/6 | DO   | Cambray E A Mrs          |

Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

|         |      |                                |
|---------|------|--------------------------------|
| 88647/6 | DO   | Coleman G Mrs                  |
| 88142/7 | DO   | Coleman J Mr                   |
| 88048/6 | DO   | Coleman Ron                    |
| 88048/7 | DO   | Coleman Ron                    |
| 89877/2 | DO/W | Ramblers Association FoD Group |
| 89833/3 | DLO  | Haseler C                      |
| 89804/5 | DLO  | Veredy Chris                   |
| 89804/6 | DLO  | Veredy Chris                   |
| 89804/7 | DLO  | Veredy Chris                   |
| 89804/3 | DLO  | Veredy Chris                   |
| 89766/5 | DLO  | Westbrook S E Ms               |
| 89766/6 | DLO  | Westbrook S E Ms               |
| 89766/7 | DLO  | Westbrook S E Ms               |
| 89766/3 | DLO  | Westbrook S E Ms               |
| 89767/5 | DLO  | Churchill Robert Mr            |
| 89767/6 | DLO  | Churchill Robert Mr            |
| 89767/3 | DLO  | Churchill Robert Mr            |
| 89769/5 | DLO  | Brown G K                      |
| 89769/6 | DLO  | Brown G K                      |
| 89769/7 | DLO  | Brown G K                      |
| 89769/3 | DLO  | Brown G K                      |
| 89771/5 | DLO  | Rickette H Mrs                 |
| 89771/6 | DLO  | Rickette H Mrs                 |
| 89771/7 | DLO  | Rickette H Mrs                 |
| 89771/3 | DLO  | Rickette H Mrs                 |
| 89772/5 | DLO  | Barr Jerry Mr                  |
| 88061/3 | DO   | Govier M F                     |
| 88061/7 | DO   | Govier M F                     |
| 88063/5 | DO   | Gregg C Mr                     |
| 88033/3 | DO/W | Guillebaud O H F               |
| 88033/6 | DO/W | Guillebaud O H F               |
| 88033/7 | DO/W | Guillebaud O H F               |
| 88065/3 | DO   | Gunning Mrs                    |
| 88065/5 | DO   | Gunning Mrs                    |
| 88154/5 | DO   | Harding U C                    |
| 88030/5 | DO   | Hards Sarah                    |
| 88368/5 | DO   | Hatter Bridgette               |
| 88358/5 | DO   | Hawkes John & Maxine           |
| 88382/5 | DO   | Hawkins W H                    |
| 88378/5 | DO   | Hejedus Christina              |
| 88065/7 | DO   | Gunning Mrs                    |
| 88154/7 | DO   | Harding U C                    |
| 88176/3 | DO   | Lane D A Ms                    |
| 88172/5 | DO/W | Kedde G                        |
| 88020/6 | DO   | Mowforth C W Dr                |
| 88022/3 | DO   | Grey A J                       |
| 88022/6 | DO   | Grey A J                       |
| 88044/5 | DO   | King E M Mrs                   |
| 88030/3 | DO   | Hards Sarah                    |
| 88030/7 | DO   | Hards Sarah                    |
| 88026/7 | DO   | Selwood H Mrs                  |
| 88173/3 | DO   | Wyndham C Ms                   |
| 88173/6 | DO   | Wyndham C Ms                   |
| 88174/6 | DO   | Marsh J M Mrs                  |
| 88175/3 | DO   | Relton Maxine                  |
| 88175/6 | DO   | Relton Maxine                  |
| 88181/6 | DO   | Blencowe L Mrs                 |
| 88182/5 | DO   | Pritchard G P Mr               |



Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

|         |      |                            |
|---------|------|----------------------------|
| 88168/6 | DO   | Ochala A                   |
| 88402/6 | DO   | Ogilvie J                  |
| 88392/6 | DO   | Pagan Jane                 |
| 88392/7 | DO   | Pagan Jane                 |
| 88039/7 | DO   | Paget,Keith                |
| 88179/6 | DO   | Palmer Anna                |
| 88156/6 | DO   | Pardoe R                   |
| 88183/6 | DO   | Passey J Mrs               |
| 88183/7 | DO   | Passey J Mrs               |
| 88151/6 | DO   | Perry G                    |
| 88365/6 | DO   | Powell-Tuck T              |
| 88026/3 | DO   | Selwood H Mrs              |
| 88066/3 | DO   | Shelley E Mrs              |
| 88051/3 | DO   | Smith Audrey               |
| 88396/3 | DO   | Smith Carla                |
| 88178/3 | DO   | Steeves-Booker Jill & Alan |
| 88184/3 | DO   | Stephens Joan E Mrs        |
| 87939/3 | DO   | Tovey Diana M.             |
| 88164/3 | DO   | Van Boeschoteu M Mrs       |
| 88185/3 | DO   | Williams A H               |
| 88141/3 | DO   | Williams Liz               |
| 88170/3 | DO   | Wiltshire Corinna Mrs      |
| 88381/3 | DO   | Wiltshire S                |
| 88150/3 | DO   | Withnell H Miss            |
| 88383/5 | DO   | McManns A & H              |
| 88052/5 | DO   | Mehta Rob & Jehanne        |
| 88038/5 | DO   | Morris B D Mr & Mrs        |
| 88020/5 | DO   | Mowforth C W Dr            |
| 88357/5 | DO   | O'Halloran Simon J K       |
| 88360/5 | DO   | Oakley Judith              |
| 88376/5 | DO   | Occupier The               |
| 88402/5 | DO   | Ogilvie J                  |
| 88392/5 | DO   | Pagan Jane                 |
| 88039/5 | DO   | Paget Keith                |
| 88156/5 | DO   | Pardoe R                   |
| 88393/5 | DO   | Parker Barbara G B         |
| 88151/5 | DO   | Perry G                    |
| 88405/5 | DO   | Poyser Sara A              |
| 88043/5 | DO   | Radford Ben                |
| 88175/5 | DO   | Relton Maxine              |
| 88388/5 | DO   | Richardson W L             |
| 88045/5 | DO   | Roberts P J Mrs            |
| 88145/5 | DO   | Robinson Joy Mrs           |
| 87947/5 | DO   | Rose Henrietta & Nick      |
| 88161/5 | DO   | Ross E Mrs                 |
| 87953/5 | DO   | Ryder Jane & Martin        |
| 88138/5 | DO   | Sawdon B                   |
| 88371/5 | DO/W | Sawtell J R                |
| 88026/5 | DO   | Selwood H Mrs              |
| 88066/5 | DO   | Shelley E Mrs              |
| 88055/5 | DO   | Shenwell D D               |
| 88391/5 | DO   | Shott R Mr                 |
| 88051/5 | DO   | Smith Audrey               |
| 88396/5 | DO   | Smith Carla                |
| 88178/5 | DO   | Steeves-Booker Jill & Alan |
| 88184/5 | DO   | Stephens Joan E Mrs        |
| 88167/5 | DO   | Tibbles R W Mr             |
| 88144/5 | DO   | Tweedy M J Ms              |

Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

|         |       |                                  |
|---------|-------|----------------------------------|
| 88164/5 | DO    | Van Boeschoteu M Mrs             |
| 88146/5 | DO    | Varah W O Mr & Mrs               |
| 88171/5 | DO    | Weavers B J Dr                   |
| 88185/5 | DO    | Williams A H                     |
| 88155/5 | DO    | Williams Ursula                  |
| 88377/5 | DO    | Wiltshire Richard                |
| 89764/3 | DLO   | Greenman Peter Thomas & Felicity |
| 89763/5 | DLO/W | Pealing S Mr                     |
| 89763/6 | DLO/W | Pealing S Mr                     |
| 89763/3 | DLO/W | Pealing S Mr                     |
| 89760/5 | DLO/W | Mildmay Crystal                  |
| 89760/6 | DLO/W | Mildmay Crystal                  |
| 89760/7 | DLO   | Mildmay Crystal                  |
| 89760/3 | DLO/W | Mildmay Crystal                  |
| 89752/5 | DLO   | Beloe Catherine                  |
| 89752/6 | DLO   | Beloe Catherine                  |
| 89752/7 | DLO   | Beloe Catherine                  |
| 88389/5 | DO    | Keeling P Mr                     |
| 88176/5 | DO    | Lane D A Ms                      |
| 88034/7 | DO    | Jones R M                        |
| 88172/7 | DO/W  | Kedde G                          |
| 88389/7 | DO    | Keeling P Mr                     |
| 88044/6 | DO    | King E M Mrs                     |
| 88169/6 | DO    | Kitson E G Mrs                   |
| 88169/7 | DO    | Kitson E G Mrs                   |
| 88059/6 | DO    | Kromm Kathy                      |
| 88059/7 | DO    | Kromm Kathy                      |
| 88176/7 | DO    | Lane D A Ms                      |
| 62747/3 | DO    | Lavell C Miss                    |
| 88394/3 | DO    | Lindop Jenny                     |
| 88649/3 | DO    | Mackie-Forrest G                 |
| 88174/3 | DO    | Marsh J M Mrs                    |
| 62747/5 | DO    | Lavell C Miss                    |
| 88394/5 | DO    | Lindop Jenny                     |
| 88046/5 | DO    | Lovegrove Martin                 |
| 88375/5 | DO    | Lucas J                          |
| 88649/5 | DO    | Mackie-Forrest G                 |
| 88174/5 | DO    | Marsh J M Mrs                    |
| 89711/2 | DO    | Taylor J V Mrs                   |
| 89711/4 | DO    | Taylor J V Mrs                   |
| 88756/4 | DO    | Living Green Centre              |
| 89715/6 | DO    | Ginns Elisabeth                  |
| 89715/4 | DO    | Ginns Elisabeth                  |
| 89714/5 | DO    | Ginns Philippa                   |
| 89714/6 | DO    | Ginns Philippa                   |
| 89714/4 | DO    | Ginns Philippa                   |
| 89713/3 | DO    | Carpenter Barbara                |
| 89713/6 | DO    | Carpenter Barbara                |
| 89713/7 | DO    | Carpenter Barbara                |
| 89745/6 | DO    | Cantwell M Mr                    |
| 89745/7 | DO    | Cantwell M Mr                    |
| 88394/6 | DO    | Lindop Jenny                     |
| 88046/7 | DO    | Lovegrove Martin                 |
| 88375/6 | DO    | Lucas J                          |
| 88649/7 | DO    | Mackie-Forrest G                 |
| 88174/7 | DO    | Marsh J M Mrs                    |
| 87965/7 | DO    | Marshall A D                     |
| 88383/6 | DO    | McManns A & H                    |

Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

|          |       |                                 |
|----------|-------|---------------------------------|
| 88140/7  | DO    | McCubbins G                     |
| 88052/6  | DO    | Mehta Rob & Jehanne             |
| 88038/6  | DO    | Morris B D Mr & Mrs             |
| 88038/7  | DO    | Morris B D Mr & Mrs             |
| 88020/7  | DO    | Mowforth C W Dr                 |
| 88357/6  | DO    | O'Halloran Simon J K            |
| 88357/7  | DO    | O'Halloran Simon J K            |
| 88360/7  | DO    | Oakley Judith                   |
| 88376/7  | DO    | Occupier The                    |
| 94947/7  | DLO   | Bryan Oda Thekla Mrs            |
| 95045/7  | DLO   | James S M Mrs                   |
| 95045/3  | DLO   | James S M Mrs                   |
| 95045/5  | DLO   | James S M Mrs                   |
| 95573/5  | DLO   | Lukas Catherine H               |
| 95573/6  | DLO   | Lukas Catherine H               |
| 90126/6  | DLO   | Lloyd Amy Perry & Julian        |
| 90126/7  | DLO   | Lloyd Amy Perry & Julian        |
| 90126/3  | DLO   | Lloyd Amy Perry & Julian        |
| 90099/7  | DLO   | Allan Christie                  |
| 90099/3  | DLO   | Allan Christie                  |
| 89982/5  | DLO   | Rowson Fiona                    |
| 90138/5  | DLO   | Anonymous (Illegible Signature) |
| 90138/6  | DLO   | Anonymous (Illegible Signature) |
| 90138/7  | DLO   | Anonymous (Illegible Signature) |
| 90138/3  | DLO   | Anonymous (Illegible Signature) |
| 90106/5  | DLO   | Hodge Jessica                   |
| 90106/6  | DLO   | Hodge Jessica                   |
| 90106/7  | DLO   | Hodge Jessica                   |
| 90106/3  | DLO   | Hodge Jessica                   |
| 90118/5  | DLO/W | Dabinett Jean Miss              |
| 90118/6  | DLO/W | Dabinett Jean Miss              |
| 90118/7  | DLO/W | Dabinett Jean Miss              |
| 90118/3  | DLO/W | Dabinett Jean Miss              |
| 90099/5  | DLO   | Allan Christie                  |
| 90099/6  | DLO   | Allan Christie                  |
| 89982/6  | DLO   | Rowson Fiona                    |
| 89982/7  | DLO   | Rowson Fiona                    |
| 89982/3  | DLO   | Rowson Fiona                    |
| 90052/5  | DLO   | Luckett M K                     |
| 90052/6  | DLO   | Luckett M K                     |
| 90052/7  | DLO   | Luckett M K                     |
| 90052/3  | DLO   | Luckett M K                     |
| 90053/1  | DLO   | Buckoke A J & E A               |
| 90096/13 | DLO   | Rice Phil Mr                    |
| 89028/7  | DO    | Langridge E Mrs                 |
| 88912/3  | DO    | Lewis H R Mr                    |
| 88912/5  | DO    | Lewis H R Mr                    |
| 89053/3  | DO    | Lewis Richard                   |
| 89053/5  | DO    | Lewis Richard                   |
| 88819/3  | DO    | Lezard T W J                    |
| 88819/5  | DO    | Lezard T W J                    |
| 89057/3  | DO    | Marsh Nicola                    |
| 89057/5  | DO    | Marsh Nicola                    |
| 89057/7  | DO    | Marsh Nicola                    |
| 89063/4  | DO    | Medcalf Hilary Mrs              |
| 89063/7  | DO    | Medcalf Hilary Mrs              |
| 89000/4  | DO    | Moggridge Hal                   |
| 89002/5  | DO    | Atterbury Clive Perkins & Janet |

Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

|         |      |                                  |
|---------|------|----------------------------------|
| 88910/5 | DO   | Baldwin Paula L C                |
| 88917/5 | DO   | Palmer Joyce K                   |
| 88917/7 | DO   | Palmer Joyce K                   |
| 89772/6 | DLO  | Barr Jerry Mr                    |
| 89772/7 | DLO  | Barr Jerry Mr                    |
| 89772/3 | DLO  | Barr Jerry Mr                    |
| 89764/5 | DLO  | Greenman Peter Thomas & Felicity |
| 89764/6 | DLO  | Greenman Peter Thomas & Felicity |
| 89764/7 | DLO  | Greenman Peter Thomas & Felicity |
| 89047/3 | DO   | Sweeting Margaret M              |
| 89047/5 | DO   | Sweeting Margaret M              |
| 88915/3 | DO   | Sycamore Angela                  |
| 89713/5 | DO   | Carpenter Barbara                |
| 89001/5 | DO   | Colson A J                       |
| 89001/7 | DO   | Colson A J                       |
| 88916/3 | DO   | Teague P R                       |
| 88916/5 | DO   | Teague P R                       |
| 88940/5 | DO   | Thornhill Alan                   |
| 88940/7 | DO   | Thornhill Alan                   |
| 88942/3 | DO   | Crabb West, Lawlor &             |
| 88942/6 | DO   | Crabb West, Lawlor &             |
| 88935/3 | DO   | Davies C A & K                   |
| 88935/5 | DO   | Davies C A & K                   |
| 88935/7 | DO   | Davies C A & K                   |
| 88167/4 | DO   | Tibbles R W Mr                   |
| 88907/3 | DO   | Davies Jenefer                   |
| 88907/6 | DO   | Davies Jenefer                   |
| 89049/3 | DO   | Easton-Lawrence Sandra           |
| 89049/6 | DO   | Easton-Lawrence Sandra           |
| 89035/3 | DO   | Veray D A Mrs                    |
| 89035/6 | DO   | Veray D A Mrs                    |
| 88906/3 | DO   | Etheridge M Mrs                  |
| 88906/5 | DO   | Etheridge M Mrs                  |
| 89023/3 | DO   | Wedgbury Kay Ms                  |
| 89023/7 | DO   | Wedgbury Kay Ms                  |
| 88909/3 | DO   | Fletcher Leo                     |
| 88909/5 | DO   | Fletcher Leo                     |
| 89040/3 | DO   | West Christopher                 |
| 89040/5 | DO   | West Christopher                 |
| 62680/1 | DO   | Furniss Brian Mr                 |
| 88141/5 | DO   | Williams Liz                     |
| 89714/3 | DO   | Ginns Philippa                   |
| 89015/5 | DO   | Wright A R Mrs                   |
| 88913/3 | DO/W | Goldring D                       |
| 88913/6 | DO/W | Goldring D                       |
| 89054/5 | DO   | Goodenough A S                   |
| 89054/7 | DO   | Goodenough A S                   |
| 89048/3 | DO   | Grendon J Mr                     |
| 89048/6 | DO   | Grendon J Mr                     |
| 89048/7 | DO   | Grendon J Mr                     |
| 89051/5 | DO   | Hatton Irene Mrs                 |
| 89051/7 | DO   | Hatton Irene Mrs                 |
| 88918/3 | DO   | Haussherr A Miss                 |
| 88918/6 | DO   | Haussherr A Miss                 |
| 89033/5 | DO   | Hayne R V                        |
| 89033/7 | DO   | Hayne R V                        |
| 88936/5 | DO   | Howell John J                    |
| 88919/3 | DO   | Jarvis R                         |

Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

|          |     |                                      |
|----------|-----|--------------------------------------|
| 88919/5  | DO  | Jarvis R                             |
| 89056/5  | DO  | Jenner Mr & Mrs                      |
| 89050/5  | DO  | Judd S Venn & Suzanne                |
| 89058/5  | DO  | Kelly S Mrs                          |
| 89058/7  | DO  | Kelly S Mrs                          |
| 89011/5  | DO  | Kennedy Norah                        |
| 89011/7  | DO  | Kennedy Norah                        |
| 88077/1  | DO  | Wheen M M Mrs                        |
| 94638/5  | DLO | Melvin L Mr                          |
| 94638/6  | DLO | Melvin L Mr                          |
| 94638/7  | DLO | Melvin L Mr                          |
| 94638/3  | DLO | Melvin L Mr                          |
| 94947/5  | DLO | Bryan Oda Thekla Mrs                 |
| 94947/6  | DLO | Bryan Oda Thekla Mrs                 |
| 88378/3  | DO  | Hejedus Christina                    |
| 62613/25 | DO  | Hempsted Residents Association       |
| 88158/3  | DO  | Allison James                        |
| 88158/6  | DO  | Allison James                        |
| 88158/7  | DO  | Allison James                        |
| 88163/3  | DO  | Baylis T Ms                          |
| 88163/5  | DO  | Baylis T Ms                          |
| 88163/7  | DO  | Baylis T Ms                          |
| 88367/3  | DO  | Bellamy P                            |
| 88367/6  | DO  | Bellamy P                            |
| 88367/7  | DO  | Bellamy P                            |
| 88149/3  | DO  | Henstock P L                         |
| 88180/3  | DO  | Hicks G K Mrs                        |
| 88910/6  | DO  | Baldwin Paula L C                    |
| 89018/3  | DO  | Bamyard J & M R                      |
| 89018/5  | DO  | Bamyard J & M R                      |
| 89018/7  | DO  | Bamyard J & M R                      |
| 89014/3  | DO  | Rasien H                             |
| 89014/5  | DO  | Rasien H                             |
| 88891/8  | DO  | Billings-Ferrand Jaqueline A The Hon |
| 89046/3  | DO  | Robinson L                           |
| 89046/6  | DO  | Robinson L                           |
| 89026/3  | DO  | Seeley R Ms                          |
| 89026/5  | DO  | Seeley R Ms                          |
| 88937/3  | DO  | Britton Maria                        |
| 88937/5  | DO  | Britton Maria                        |
| 89055/3  | DO  | Simonon Lin                          |
| 89055/5  | DO  | Simonon Lin                          |
| 89055/7  | DO  | Simonon Lin                          |
| 88938/5  | DO  | Burrough J S & W                     |
| 89037/3  | DO  | Smith Duncan                         |
| 88166/6  | DO  | Cook L W Mr & Mrs                    |
| 89752/3  | DLO | Beloe Catherine                      |
| 89755/5  | DLO | Benn Kevin Mr                        |
| 89755/6  | DLO | Benn Kevin Mr                        |
| 89755/7  | DLO | Benn Kevin Mr                        |
| 89755/3  | DLO | Benn Kevin Mr                        |
| 89751/5  | DLO | Mate R & J Mr & Mrs                  |
| 89751/6  | DLO | Mate R & J Mr & Mrs                  |
| 89751/7  | DLO | Mate R & J Mr & Mrs                  |
| 89751/3  | DLO | Mate R & J Mr & Mrs                  |
| 95573/7  | DLO | Lukas Catherine H                    |
| 95573/3  | DLO | Lukas Catherine H                    |
| 91523/5  | DLO | Ruchbrooke J J                       |

Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

|         |       |                                      |
|---------|-------|--------------------------------------|
| 91523/6 | DLO   | Ruchbrooke J J                       |
| 91523/7 | DLO   | Ruchbrooke J J                       |
| 91523/3 | DLO   | Ruchbrooke J J                       |
| 90134/5 | DLO   | Croxall Elinor                       |
| 90134/6 | DLO   | Croxall Elinor                       |
| 90134/7 | DLO   | Croxall Elinor                       |
| 90134/3 | DLO   | Croxall Elinor                       |
| 90678/5 | DLO   | Clemeson Hilary                      |
| 88401/7 | DO    | Cambray E A Mrs                      |
| 88370/7 | DO    | Claridge Patricia                    |
| 88179/7 | DO    | Palmer Anna                          |
| 89763/7 | DLO/W | Pealing S Mr                         |
| 94947/3 | DLO   | Bryan Oda Thekla Mrs                 |
| 88915/6 | DO    | Sycamore Angela                      |
| 88388/6 | DO    | Richardson W L                       |
| 88362/6 | DO    | Evans S M                            |
| 88356/3 | DO    | Deproost Steven                      |
| 89001/3 | DO    | Colson A J                           |
| 88404/3 | DO    | James Sian Ms                        |
| 89063/8 | DO    | Medcalf Hilary Mrs                   |
| 88891/4 | DO    | Billings-Ferrand Jaqueline A The Hon |
| 88891/6 | DO    | Billings-Ferrand Jaqueline A The Hon |
| 88891/7 | DO    | Billings-Ferrand Jaqueline A The Hon |
| 88904/1 | DO    | Brown Margaret                       |
| 88879/1 | DO    | Irving R W                           |
| 90678/6 | DLO   | Clemeson Hilary                      |
| 90678/7 | DLO   | Clemeson Hilary                      |
| 90678/3 | DLO   | Clemeson Hilary                      |
| 90126/5 | DLO   | Lloyd Amy Perry & Julian             |
| 89037/5 | DO    | Smith Duncan                         |
| 88938/7 | DO    | Burrough J S & W                     |
| 88911/3 | DO    | Sutton-Smith Deirdre                 |
| 88911/6 | DO    | Sutton-Smith Deirdre                 |
| 89745/3 | DO    | Cantwell M Mr                        |
| 89745/5 | DO    | Cantwell M Mr                        |
| 88040/6 | DO    | Richards Alex R                      |
| 88388/7 | DO    | Richardson W L                       |
| 88045/6 | DO    | Roberts P J Mrs                      |
| 88045/7 | DO    | Roberts P J Mrs                      |
| 88145/6 | DO    | Robinson Joy Mrs                     |
| 88145/7 | DO    | Robinson Joy Mrs                     |
| 87947/6 | DO    | Rose Henrietta & Nick                |
| 88161/6 | DO    | Ross E Mrs                           |
| 88161/7 | DO    | Ross E Mrs                           |
| 88138/7 | DO    | Sawdon B                             |
| 88026/6 | DO    | Selwood H Mrs                        |
| 88066/6 | DO    | Shelley E Mrs                        |
| 88055/6 | DO    | Shenwell D D                         |
| 88391/7 | DO    | Shott R Mr                           |
| 88051/6 | DO    | Smith Audrey                         |
| 88396/6 | DO    | Smith Carla                          |
| 88178/7 | DO    | Steeves-Booker Jill & Alan           |
| 88184/7 | DO    | Stephens Joan E Mrs                  |
| 87939/6 | DO    | Tovey Diana M.                       |
| 88144/6 | DO    | Tweedy M J Ms                        |
| 88144/7 | DO    | Tweedy M J Ms                        |
| 88164/6 | DO    | Van Boeschoteu M Mrs                 |
| 88171/7 | DO    | Weavers B J Dr                       |

Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

|         |      |                          |
|---------|------|--------------------------|
| 88398/6 | DO   | White Margaret           |
| 88398/7 | DO   | White Margaret           |
| 88185/6 | DO   | Williams A H             |
| 88141/6 | DO   | Williams Liz             |
| 88141/7 | DO   | Williams Liz             |
| 88155/7 | DO   | Williams Ursula          |
| 88170/7 | DO   | Wiltshire Corinna Mrs    |
| 88380/6 | DO   | Wiltshire Melanie J      |
| 88380/7 | DO   | Wiltshire Melanie J      |
| 88377/7 | DO   | Wiltshire Richard        |
| 88381/6 | DO   | Wiltshire S              |
| 88150/6 | DO   | Withnell H Miss          |
| 87950/4 | DO/W | Wyatt John               |
| 87950/5 | DO/W | Wyatt John               |
| 88173/7 | DO   | Wyndham C Ms             |
| 88162/7 | DO/W | Yearsley J V             |
| 88403/7 | DO   | Young Gordon Mr          |
| 88383/3 | DO   | McManns A & H            |
| 88052/3 | DO   | Mehta Rob & Jehanne      |
| 88020/3 | DO   | Mowforth C W Dr          |
| 88376/3 | DO   | Occupier The             |
| 88168/3 | DO   | Ochala A                 |
| 88402/3 | DO   | Ogilvie J                |
| 88392/3 | DO   | Pagan Jane               |
| 88156/3 | DO   | Pardoe R                 |
| 88151/3 | DO   | Perry G                  |
| 88365/3 | DO   | Powell-Tuck T            |
| 88182/3 | DO   | Pritchard G P Mr         |
| 88363/3 | DO/W | Redmond G Mrs            |
| 88388/3 | DO   | Richardson W L           |
| 88045/3 | DO   | Roberts P J Mrs          |
| 88043/7 | DO   | Radford Ben              |
| 88386/6 | DO   | Ramsden Keith            |
| 88363/6 | DO/W | Redmond G Mrs            |
| 88175/7 | DO   | Relton Maxine            |
| 88356/6 | DO   | Deproost Steven          |
| 88357/3 | DO   | O'Halloran Simon J K     |
| 88358/7 | DO   | Hawkes John & Maxine     |
| 88359/3 | DO   | Bennett B                |
| 88359/7 | DO   | Bennett B                |
| 88360/3 | DO   | Oakley Judith            |
| 88360/6 | DO   | Oakley Judith            |
| 88361/6 | DO   | Humble S Mrs             |
| 88362/5 | DO   | Evans S M                |
| 88363/5 | DO   | Redmond G Mrs            |
| 88363/7 | DO   | Redmond G Mrs            |
| 88365/5 | DO   | Powell-Tuck T            |
| 88367/5 | DO   | Bellamy P                |
| 88368/3 | DO   | Hatter Bridgette         |
| 88368/6 | DO   | Hatter Bridgette         |
| 88369/3 | DO/W | Brinkworth M             |
| 88369/6 | DO/W | Brinkworth M             |
| 88370/3 | DO   | Claridge Patricia        |
| 88370/6 | DO   | Claridge Patricia        |
| 62073/3 | DO/W | Wiltshire County Council |
| 89715/3 | DO   | Ginns Elisabeth          |
| 89715/5 | DO   | Ginns Elisabeth          |
| 88371/3 | DO/W | Sawtell J R              |

Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

|         |      |                               |
|---------|------|-------------------------------|
| 88371/6 | DO/W | Sawtell J R                   |
| 88371/7 | DO/W | Sawtell J R                   |
| 88373/3 | DO   | Jeldin D                      |
| 88374/6 | DO   | Hudson A Mrs                  |
| 88149/5 | DO   | Henstock P L                  |
| 88150/5 | DO   | Withnell H Miss               |
| 88150/7 | DO   | Withnell H Miss               |
| 88151/7 | DO   | Perry G                       |
| 88152/3 | DO   | Cordery Peter                 |
| 88152/6 | DO   | Cordery Peter                 |
| 88153/6 | DO/W | Fanthorpe & Dr R V Bailey U A |
| 88143/5 | DO/W | Ibbotson H Mrs                |
| 88181/7 | DO   | Blencowe L Mrs                |
| 88373/5 | DO   | Jeldin D                      |
| 88024/5 | DO   | Jenkins E Miss                |
| 88400/5 | DO   | Blount J D Mr                 |
| 88035/5 | DO   | Johnson P E Mrs               |
| 88149/6 | DO   | Henstock P L                  |
| 88149/7 | DO   | Henstock P L                  |
| 88180/6 | DO   | Hicks G K Mrs                 |
| 88139/6 | DO   | Housden Helen C Mrs           |
| 88139/7 | DO   | Housden Helen C Mrs           |
| 88374/7 | DO   | Hudson A Mrs                  |
| 88361/7 | DO   | Humble S Mrs                  |
| 88143/6 | DO/W | Ibbotson H Mrs                |
| 88400/6 | DO   | Blount J D Mr                 |
| 88404/6 | DO   | James Sian Ms                 |
| 88404/7 | DO   | James Sian Ms                 |
| 88373/6 | DO   | Jeldin D                      |
| 88373/7 | DO   | Jeldin D                      |
| 88166/7 | DO   | Cook L W Mr & Mrs             |
| 88152/7 | DO   | Cordery Peter                 |
| 88135/7 | DO   | Coulton David                 |
| 88157/7 | DO   | Crabb Elsie                   |
| 87944/7 | DO   | Crosby Claire Dr              |
| 88165/7 | DO   | Daniels Liz                   |
| 88399/6 | DO   | Daunt Marian Mrs              |
| 88374/3 | DO   | Hudson A Mrs                  |
| 88361/3 | DO   | Humble S Mrs                  |
| 88359/5 | DO   | Bennett B                     |
| 88359/6 | DO   | Bennett B                     |
| 88024/3 | DO   | Jenkins E Miss                |
| 88047/3 | DO   | Bilbrough H G Mr              |
| 88047/6 | DO   | Bilbrough H G Mr              |
| 88047/7 | DO   | Bilbrough H G Mr              |
| 88369/5 | DO/W | Brinkworth M                  |
| 88369/7 | DO/W | Brinkworth M                  |
| 88334/1 | DO/W | Jones C Mrs                   |
| 88172/3 | DO/W | Kedde G                       |
| 88389/3 | DO   | Keeling P Mr                  |
| 88044/3 | DO   | King E M Mrs                  |
| 88169/3 | DO   | Kitson E G Mrs                |
| 88059/3 | DO   | Kromm Kathy                   |
| 88910/7 | DO   | Baldwin Paula L C             |
| 88911/5 | DO   | Sutton-Smith Deirdre          |
| 88911/7 | DO   | Sutton-Smith Deirdre          |
| 88912/6 | DO   | Lewis H R Mr                  |
| 88912/7 | DO   | Lewis H R Mr                  |



Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

|         |      |                           |
|---------|------|---------------------------|
| 88913/5 | DO/W | Goldring D                |
| 88913/7 | DO/W | Goldring D                |
| 88915/5 | DO   | Sycamore Angela           |
| 88919/7 | DO   | Jarvis R                  |
| 88935/6 | DO   | Davies C A & K            |
| 88937/6 | DO   | Britton Maria             |
| 88937/7 | DO   | Britton Maria             |
| 88938/3 | DO   | Burrough J S & W          |
| 88938/6 | DO   | Burrough J S & W          |
| 88940/3 | DO   | Thornhill Alan            |
| 88940/6 | DO   | Thornhill Alan            |
| 88181/3 | DO   | Blencowe L Mrs            |
| 88044/7 | DO   | King E M Mrs              |
| 88043/3 | DO   | Radford Ben               |
| 88038/3 | DO   | Morris B D Mr & Mrs       |
| 88039/3 | DO   | Paget Keith               |
| 88039/6 | DO   | Paget Keith               |
| 88035/3 | DO   | Johnson P E Mrs           |
| 88035/6 | DO   | Johnson P E Mrs           |
| 88033/5 | DO/W | Guillebaud O H F          |
| 88051/7 | DO   | Smith Audrey              |
| 88050/3 | DO/W | Dawson Bryan and Margaret |
| 88050/6 | DO/W | Dawson Bryan and Margaret |
| 88050/7 | DO/W | Dawson Bryan and Margaret |
| 88048/3 | DO   | Coleman Ron               |
| 88047/5 | DO   | Bilbrough H G Mr          |
| 88046/3 | DO   | Lovegrove Martin          |
| 88065/6 | DO   | Gunning Mrs               |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support  
D= Deposit; R= Revised Deposit

#### Figure 4: Chapter 4 – Incineration with Energy Recovery

##### Comments

| Comments No. | Status (See Key) | Name                |
|--------------|------------------|---------------------|
| 88645/4      | DO               | Carr Jane           |
| 88646/4      | DO               | Glenny Michael      |
| 88398/4      | DO               | White Margaret      |
| 88393/4      | DO               | Parker Barbara G B  |
| 60509/7      | DO               | Grundon (Waste) Ltd |
| 88405/4      | DO               | Poyser Sara A       |
| 88404/4      | DO               | James Sian Ms       |
| 88403/4      | DO               | Young Gordon Mr     |
| 88402/4      | DO               | Ogilvie J           |
| 88401/4      | DO               | Cambray E A Mrs     |
| 88400/4      | DO               | Blount J D Mr       |
| 88653/4      | DO               | Fromly S D          |
| 88652/4      | DO               | Grimster J A        |
| 88651/4      | DO               | Brice Sheila J M    |
| 88386/4      | DO               | Ramsden Keith       |
| 88384/4      | DO               | French Rheema       |
| 88383/4      | DO               | McManns A & H       |
| 88382/4      | DO               | Hawkins W H         |

Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

|         |      |                               |
|---------|------|-------------------------------|
| 88363/4 | DO   | Redmond G Mrs                 |
| 88362/4 | DO   | Evans S M                     |
| 88361/4 | DO   | Humble S Mrs                  |
| 88360/4 | DO   | Oakley Judith                 |
| 88359/4 | DO   | Bennett B                     |
| 88358/4 | DO   | Hawkes John & Maxine          |
| 88144/4 | DO   | Tweedy M J Ms                 |
| 88143/4 | DO/W | Ibbotson H Mrs                |
| 88142/4 | DO   | Coleman J Mr                  |
| 88141/4 | DO   | Williams Liz                  |
| 88140/4 | DO   | McCubbins G                   |
| 88139/4 | DO   | Housden Helen C Mrs           |
| 88164/4 | DO   | Van Boeschoteu M Mrs          |
| 88163/4 | DO   | Baylis T Ms                   |
| 88162/4 | DO/W | Yearsley J V                  |
| 88161/4 | DO   | Ross E Mrs                    |
| 88160/4 | DO   | Fielding A W T Mr & Mrs       |
| 88158/4 | DO   | Allison James                 |
| 88157/4 | DO   | Crabb Elsie                   |
| 88156/4 | DO   | Pardoe R                      |
| 88155/4 | DO   | Williams Ursula               |
| 88154/4 | DO   | Harding U C                   |
| 88153/4 | DO/W | Fanthorpe & Dr R V Bailey U A |
| 88152/4 | DO   | Cordery Peter                 |
| 88042/4 | DO   | Faulkner Claire               |
| 88172/4 | DO/W | Kedde G                       |
| 88171/4 | DO   | Weavers B J Dr                |
| 88170/4 | DO   | Wiltshire Corinna Mrs         |
| 88169/4 | DO   | Kitson E G Mrs                |
| 88168/4 | DO   | Ochala A                      |
| 88166/4 | DO   | Cook L W Mr & Mrs             |
| 88165/4 | DO   | Daniels Liz                   |
| 88050/4 | DO/W | Dawson Bryan and Margaret     |
| 88051/4 | DO   | Smith Audrey                  |
| 88052/4 | DO   | Mehta Rob & Jehanne           |
| 88055/4 | DO   | Shenwell D D                  |
| 88059/4 | DO   | Kromm Kathy                   |
| 88061/4 | DO   | Govier M F                    |
| 88063/4 | DO   | Gregg C Mr                    |
| 88064/4 | DO   | Shaw-Maslin Sarah             |
| 88065/4 | DO   | Gunning Mrs                   |
| 88067/4 | DO   | Edgington S                   |
| 88066/4 | DO   | Shelley E Mrs                 |
| 88034/4 | DO   | Jones R M                     |
| 88038/4 | DO   | Morris B D Mr & Mrs           |
| 88043/4 | DO   | Radford Ben                   |
| 88044/4 | DO   | King E M Mrs                  |
| 88022/4 | DO   | Grey A J                      |
| 88020/4 | DO   | Mowforth C W Dr               |
| 88024/4 | DO   | Jenkins E Miss                |
| 88040/4 | DO   | Richards Alex R               |
| 88045/4 | DO   | Roberts P J Mrs               |
| 88046/4 | DO   | Lovegrove Martin              |
| 88047/4 | DO   | Bilbrough H G Mr              |
| 88048/4 | DO   | Coleman Ron                   |
| 88179/4 | DO   | Palmer Anna                   |
| 88178/4 | DO   | Steeves-Booker Jill & Alan    |
| 88177/4 | DO   | Dickenson L                   |

Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

|          |       |                                      |
|----------|-------|--------------------------------------|
| 88176/4  | DO    | Lane D A Ms                          |
| 88175/4  | DO    | Relton Maxine                        |
| 88174/4  | DO    | Marsh J M Mrs                        |
| 88173/4  | DO    | Wyndham C Ms                         |
| 88026/4  | DO    | Selwood H Mrs                        |
| 88030/4  | DO    | Hards Sarah                          |
| 88033/4  | DO/W  | Guillebaud O H F                     |
| 88035/4  | DO    | Johnson P E Mrs                      |
| 88039/4  | DO    | Paget Keith                          |
| 87949/4  | DO    | Fernyhough A Mrs                     |
| 87947/4  | DO    | Rose Henrietta & Nick                |
| 97779/3  | RDS   | ETSU                                 |
| 95069/4  | DLO   | Sutton J Ms                          |
| 95045/4  | DLO   | James S M Mrs                        |
| 94947/4  | DLO   | Bryan Oda Thekla Mrs                 |
| 89977/2  | DLO   | Kirby Jeff Dr                        |
| 90096/14 | DLO   | Rice Phil Mr                         |
| 91523/4  | DLO   | Ruchbrooke J J                       |
| 94638/4  | DLO   | Melvin L Mr                          |
| 90052/4  | DLO   | Luckett M K                          |
| 89982/4  | DLO   | Rowson Fiona                         |
| 90099/4  | DLO   | Allan Christie                       |
| 90118/4  | DLO/W | Dabinett Jean Miss                   |
| 90106/4  | DLO   | Hodge Jessica                        |
| 90138/4  | DLO   | Anonymous (Illegible Signature)      |
| 90126/4  | DLO   | Lloyd Amy Perry & Julian             |
| 90678/4  | DLO   | Clemeson Hilary                      |
| 90134/4  | DLO   | Croxall Elinor                       |
| 89764/4  | DLO   | Greenman Peter Thomas & Felicity     |
| 89772/4  | DLO   | Barr Jerry Mr                        |
| 89771/4  | DLO   | Rickette H Mrs                       |
| 89769/4  | DLO   | Brown G K                            |
| 89767/4  | DLO   | Churchill Robert Mr                  |
| 89766/4  | DLO   | Westbrook S E Ms                     |
| 89804/4  | DLO   | Verey Chris                          |
| 89752/4  | DLO   | Beloe Catherine                      |
| 89760/4  | DLO/W | Mildmay Crystal                      |
| 89763/4  | DLO/W | Pealing S Mr                         |
| 89751/4  | DLO   | Mate R & J Mr & Mrs                  |
| 89755/4  | DLO   | Benn Kevin Mr                        |
| 89833/4  | DLO   | Haseler C                            |
| 89002/4  | DO    | Atterbury Clive Perkins & Janet      |
| 62637/10 | DO    | Cory Environmental (Glos) Ltd        |
| 62637/2  | DO/W  | Cory Environmental (Glos) Ltd        |
| 89745/4  | DO    | Cantwell M Mr                        |
| 89713/4  | DO    | Carpenter Barbara                    |
| 89063/5  | DO    | Medcalf Hilary Mrs                   |
| 89058/4  | DO    | Kelly S Mrs                          |
| 89057/4  | DO    | Marsh Nicola                         |
| 89056/4  | DO    | Jenner Mr & Mrs                      |
| 89055/4  | DO    | Simonon Lin                          |
| 88891/5  | DO    | Billings-Ferrand Jaqueline A The Hon |
| 89051/4  | DO    | Hatton Irene Mrs                     |
| 89050/4  | DO    | Judd S Venn & Suzanne                |
| 89049/4  | DO    | Easton-Lawrence Sandra               |
| 89048/4  | DO    | Grendon J Mr                         |
| 88919/4  | DO    | Jarvis R                             |
| 88918/4  | DO    | Haussherr A Miss                     |

Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

|         |      |                          |
|---------|------|--------------------------|
| 88917/4 | DO   | Palmer Joyce K           |
| 88916/4 | DO   | Teague P R               |
| 88915/4 | DO   | Sycamore Angela          |
| 88913/4 | DO/W | Goldring D               |
| 88912/4 | DO   | Lewis H R Mr             |
| 88911/4 | DO   | Sutton-Smith Deirdre     |
| 88910/4 | DO   | Baldwin Paula L C        |
| 88909/4 | DO   | Fletcher Leo             |
| 88907/4 | DO   | Davies Jenefer           |
| 89053/4 | DO   | Lewis Richard            |
| 89011/4 | DO   | Kennedy Norah            |
| 89054/4 | DO   | Goodenough A S           |
| 89008/4 | DO   | Hunt Alison J            |
| 89001/4 | DO   | Colson A J               |
| 88819/4 | DO   | Lezard T W J             |
| 88942/4 | DO   | Crabb West, Lawlor &     |
| 88940/4 | DO   | Thornhill Alan           |
| 88938/4 | DO   | Burrough J S & W         |
| 88357/4 | DO   | O'Halloran Simon J K     |
| 88356/4 | DO   | Deproost Steven          |
| 88377/4 | DO   | Wiltshire Richard        |
| 88376/4 | DO   | Occupier The             |
| 88375/4 | DO   | Lucas J                  |
| 88374/4 | DO   | Hudson A Mrs             |
| 88373/4 | DO   | Jeldin D                 |
| 88371/4 | DO/W | Sawtell J R              |
| 88370/4 | DO   | Claridge Patricia        |
| 88369/4 | DO/W | Brinkworth M             |
| 88368/4 | DO   | Hatter Bridgette         |
| 88367/4 | DO   | Bellamy P                |
| 88365/4 | DO   | Powell-Tuck T            |
| 88138/4 | DO   | Sawdon B                 |
| 88392/4 | DO   | Pagan Jane               |
| 88391/4 | DO   | Shott R Mr               |
| 88389/4 | DO   | Keeling P Mr             |
| 88388/4 | DO   | Richardson W L           |
| 88381/4 | DO   | Wiltshire S              |
| 88380/4 | DO   | Wiltshire Melanie J      |
| 88378/4 | DO   | Hejedus Christina        |
| 88151/4 | DO   | Perry G                  |
| 88150/4 | DO   | Withnell H Miss          |
| 88149/4 | DO   | Henstock P L             |
| 88146/4 | DO   | Varah W O Mr & Mrs       |
| 88145/4 | DO   | Robinson Joy Mrs         |
| 88135/4 | DO   | Coulton David            |
| 88185/4 | DO   | Williams A H             |
| 88184/4 | DO   | Stephens Joan E Mrs      |
| 88183/4 | DO   | Passey J Mrs             |
| 88182/4 | DO   | Pritchard G P Mr         |
| 88181/4 | DO   | Blencowe L Mrs           |
| 88180/4 | DO   | Hicks G K Mrs            |
| 87953/4 | DO   | Ryder Jane & Martin      |
| 61775/4 | DO   | Prestbury Parish Council |
| 87944/4 | DO   | Crosby Claire Dr         |
| 87939/4 | DO   | Tovey Diana M.           |
| 87930/4 | DO   | Fryer W L Mr             |
| 87965/4 | DO   | Marshall A D             |
| 95573/4 | DLO  | Lukas Catherine H        |

Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

|         |    |                     |
|---------|----|---------------------|
| 88937/4 | DO | Britton Maria       |
| 88935/4 | DO | Davies C A & K      |
| 89046/4 | DO | Robinson L          |
| 89040/4 | DO | West Christopher    |
| 89037/4 | DO | Smith Duncan        |
| 89035/4 | DO | Verey D A Mrs       |
| 89033/4 | DO | Hayne R V           |
| 89028/4 | DO | Langridge E Mrs     |
| 89023/4 | DO | Wedgbury Kay Ms     |
| 89022/4 | DS | Corcoran D J        |
| 89018/4 | DO | Bamyard J & M R     |
| 89015/4 | DO | Wright A R Mrs      |
| 89014/4 | DO | Rasien H            |
| 88906/4 | DO | Etheridge M Mrs     |
| 88936/4 | DO | Howell John J       |
| 89047/4 | DO | Sweeting Margaret M |
| 89026/4 | DO | Seeley R Ms         |
| 88399/4 | DO | Daunt Marian Mrs    |
| 88396/4 | DO | Smith Carla         |
| 88395/4 | DO | Fletcher B A Ms     |
| 88394/4 | DO | Lindop Jenny        |
| 88650/4 | DO | Forrest G           |
| 88649/4 | DO | Mackie-Forrest G    |
| 88647/4 | DO | Coleman G Mrs       |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support

D= Deposit; R= Revised Deposit

## Figure 5: Chapter 4 – Site 3

### Comments

| Comments No. | Status (See Key) | Name                          |
|--------------|------------------|-------------------------------|
| 88590/1      | DO               | Croft S Mrs                   |
| 88529/1      | DO               | Gardiner K A Mr               |
| 88588/1      | DO/W             | Martin David                  |
| 88660/1      | DO               | Bennett Gillian               |
| 88332/1      | DO               | Hepburn G R                   |
| 88333/1      | DO               | Wride B Mrs                   |
| 88335/1      | DO               | Bright C.Eng. M.I.M.E F L     |
| 88336/1      | DO               | Radford Garry                 |
| 88337/1      | DO               | James C Mrs                   |
| 62044/1      | DO               | Tewkesbury Borough Council    |
| 88385/1      | DO               | Housden W E Mrs               |
| 88329/1      | DO               | Middleton Valencia J          |
| 88074/1      | DO               | MacFarlane D D & C A          |
| 88076/1      | DO               | Palmer M                      |
| 88075/1      | DO               | Jones D Miss                  |
| 88082/1      | DO               | Spriggs & Lucy Phillips Chris |
| 61849/1      | DO               | Badgeworth Parish Council     |
| 63115/1      | DO               | Hucclecote Parish Council     |
| 87033/1      | DO               | Smith J B                     |
| 87026/1      | DO               | Polley J                      |
| 86839/1      | DO               | Pope R A                      |
| 88124/1      | DO               | Meadows R N                   |
| 88127/1      | DO               | Osborne Ann & Maurice         |

Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

|         |      |  |
|---------|------|--|
| 87894/1 | DO   | Tury Mr & Mrs                          |
| 87715/1 | DO   | Arlington Property Developments Ltd    |
| 87720/1 | DO   | Clayton A L Mr                         |
| 87711/1 | DO   | Williams R P                           |
| 87709/1 | DO   | Roselli Mr & Mrs                       |
| 87708/1 | DO   | Prescott Mr & Mrs                      |
| 62041/2 | DO   | Stroud District Council                |
| 88006/1 | DO   | Haines & Miss S J Caudle N M           |
| 62012/3 | DO/W | Highways Agency                        |
| 87895/1 | DO   | Cartz Marc                             |
| 87765/1 | DO   | Cullen John                            |
| 87707/1 | DO   | Blake D G Mr                           |
| 87747/1 | DO   | Wijker J & A                           |
| 87750/1 | DO   | Sartin D F                             |
| 87748/1 | DO   | Goodhall David K Mr                    |
| 87749/1 | DO   | Snell R J & M P                        |
| 88797/8 | RDO  | Federal Mogul Corporation              |
| 62043/4 | RDS  | Gloucester City Council                |
| 98640/8 | RDO  | Trustees of W. J Liddington (Deceased) |
| 88319/2 | DO   | Phillips Harriet                       |
| 88321/2 | DO   | Girvan S Mrs                           |
| 88320/2 | DO   | Girvan D Mr                            |
| 90127/1 | DLO  | Hucclecote Lodge                       |
| 90043/1 | DLO  | McGrigor AJB Group Captain             |
| 89754/1 | DLO  | Clarke D C Mr                          |
| 89718/1 | DO   | Ramsey H P Mr                          |
| 89721/1 | DO   | Curtis H M Mrs                         |
| 89800/1 | DO   | Clifford Gordon                        |
| 89741/1 | DO   | Matthews M                             |
| 88658/1 | DO   | Hannaford John                         |
| 89717/1 | DO   | Kester PJ Mr                           |
| 89722/1 | DO   | Reed KJ Mr                             |
| 62043/1 | DO/W | Gloucester City Council                |
| 88330/2 | DO   | Roberts R K Mr & Mrs                   |
| 89710/1 | DO   | Byard C & J                            |
| 89743/1 | DO   | Gardener S Mr                          |
| 89735/1 | DO   | Bailey A D Mr                          |
| 89852/1 | DO   | Tair El Bar A S Dr                     |
| 89723/1 | DO   | Moody H Mrs                            |
| 89725/1 | DO   | Harrison Keith Mr                      |
| 89729/2 | DO   | Lock J C Mr & Mrs                      |
| 88881/1 | DO   | Gregory P R & M R                      |
| 88828/1 | DO   | Carr David                             |
| 62013/9 | DO/W | English Nature                         |
| 88750/1 | DO   | Miller D Mr                            |
| 88884/1 | DO   | Brooke Elizabeth                       |
| 88876/1 | DO   | Bamber R E                             |
| 88537/1 | DO   | Bovis Homes Ltd                        |
| 88872/1 | DO   | Chase J                                |
| 88538/1 | DO   | Westbury Homes Ltd                     |
| 88695/1 | DO   | Mather E Mrs                           |
| 88623/1 | DO   | Johns D J Mr                           |
| 88599/1 | DO   | Lawlor P J Mr                          |
| 88611/1 | DO   | Biddle K D                             |
| 88629/1 | DO   | Colwell J Mrs                          |
| 88657/1 | DO   | MacGregor Gregor                       |
| 88823/2 | DO   | Du Pont (UK) Ltd                       |
| 62016/1 | DO   | Gloucestershire Wildlife Trust         |

Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

|         |    |                      |
|---------|----|----------------------|
| 88330/1 | DO | Roberts R K Mr & Mrs |
| 88339/1 | DO | Anonymous            |
| 88661/1 | DO | Oliver Steve         |
| 88601/1 | DO | Hawkes Robert        |
| 88597/1 | DO | Harris R G           |
| 88320/1 | DO | Girvan D Mr          |
| 88321/1 | DO | Girvan S Mrs         |
| 88319/1 | DO | Phillips Harriet     |
| 88317/1 | DO | Griffiths Ron D      |
| 88187/1 | DO | Brown Terry & Jill   |
| 88189/1 | DO | Clewes I H Mr & Mrs  |
| 88073/1 | DO | Holder Eileen Mrs    |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support  
D= Deposit; R= Revised Deposit

**Figure 6: Chapter 4 – Site 6**

**Comments**

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88594/1      | DO               | Turl V Mrs                             |
| 88591/1      | DO               | Nash Mrs                               |
| 88593/1      | DO               | Sollars Dennis                         |
| 88592/1      | DO               | Sollars Mary                           |
| 61850/1      | DS               | Dursley Town Council                   |
| 88326/1      | DO               | Hutchings V R Mr                       |
| 88398/8      | DO               | White Margaret                         |
| 88403/8      | DO               | Young Gordon Mr                        |
| 88402/8      | DO               | Ogilvie J                              |
| 88401/8      | DO               | Cambray E A Mrs                        |
| 88400/8      | DO               | Blount J D Mr                          |
| 88649/8      | DO               | Mackie-Forrest G                       |
| 88647/8      | DO               | Coleman G Mrs                          |
| 88646/8      | DO               | Glenny Michael                         |
| 88645/8      | DO               | Carr Jane                              |
| 88407/1      | DO               | Seer Geoff                             |
| 88195/1      | DO               | Price J E Mr                           |
| 88405/8      | DO               | Poyser Sara A                          |
| 88404/8      | DO               | James Sian Ms                          |
| 88624/1      | DO               | Robertson J L                          |
| 88638/1      | DO               | Price B J Mr                           |
| 88641/1      | DO               | Price A Mrs                            |
| 88640/1      | DO               | Price M Master                         |
| 88931/1      | DO               | Lamb C                                 |
| 88930/1      | DO               | McKie A Mrs                            |
| 88929/1      | DO               | McKie Ian                              |
| 88928/1      | DO               | Newton M J Mr                          |
| 89047/8      | DO               | Sweeting Margaret M                    |
| 89046/8      | DO               | Robinson L                             |
| 88713/26     | DO               | Friends of the Earth (Gloucestershire) |
| 88619/1      | DO               | Lewis Julie                            |
| 88935/8      | DO               | Davies C A & K                         |
| 89040/8      | DO               | West Christopher                       |
| 89037/8      | DO               | Smith Duncan                           |

Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

|         |      |                         |
|---------|------|-------------------------|
| 89035/8 | DO   | Veray D A Mrs           |
| 89033/8 | DO   | Hayne R V               |
| 89028/8 | DO   | Langridge E Mrs         |
| 88883/2 | DO/W | Tucker P W Mr & Mrs     |
| 89026/8 | DO   | Seeley R Ms             |
| 88911/8 | DO   | Sutton-Smith Deirdre    |
| 88910/8 | DO   | Baldwin Paula L C       |
| 88909/8 | DO   | Fletcher Leo            |
| 88907/8 | DO   | Davies Jenefer          |
| 89051/8 | DO   | Hatton Irene Mrs        |
| 89008/8 | DO   | Hunt Alison J           |
| 89054/8 | DO   | Goodenough A S          |
| 89053/8 | DO   | Lewis Richard           |
| 89857/1 | DLO  | Savage S E              |
| 89853/1 | DLO  | Savage Joanne           |
| 89850/1 | DLO  | Savage Chris            |
| 89848/1 | DLO  | Savage K D              |
| 89847/1 | DLO  | Cadenhead B D Mr        |
| 89845/1 | DLO  | Cadenhead Ruth Dr       |
| 89839/1 | DLO  | Holmes E Mrs            |
| 89837/1 | DLO  | Holmes E Mr             |
| 89835/1 | DLO  | Weaving T Mr            |
| 89834/1 | DLO  | Weaving K Mrs           |
| 89832/1 | DLO  | Priday S M Mr & Mrs     |
| 89828/1 | DLO  | Wright L Mrs            |
| 89827/1 | DLO  | Woodward G Mr           |
| 89822/1 | DLO  | Hadley K J Mr           |
| 89787/1 | DLO  | Tuffin Iain Mr          |
| 89791/1 | DLO  | Stewart A               |
| 89793/1 | DLO  | George Barry Mr         |
| 89794/1 | DLO  | Browning Y W Mrs        |
| 89795/1 | DLO  | Doane K & C Mr & Mrs    |
| 89796/1 | DLO  | Remnant J               |
| 89782/1 | DLO  | Deacon J Mrs            |
| 89783/1 | DLO  | Lavis C Mr              |
| 89784/1 | DLO  | Deacon P R Mr           |
| 89751/8 | DLO  | Mate R & J Mr & Mrs     |
| 89730/1 | DO   | Roszczyk A Mr           |
| 88658/5 | DO   | Hannaford John          |
| 89719/1 | DO   | Varnam R Mr             |
| 90196/1 | DLO  | Browning A W Mr         |
| 90131/1 | DLO  | Cawley D J              |
| 90141/1 | DLO  | Worley Donna & Melville |
| 89833/8 | DLO  | Haseler C               |
| 89829/1 | DLO  | Nelmes D Mrs            |
| 89831/1 | DLO  | Boobyer P & V           |
| 89773/1 | DLO  | Hillier G,C,P & B       |
| 89840/1 | DLO  | Hickman E Mrs           |
| 89841/1 | DLO  | Hickman P Mr            |
| 89890/1 | DLO  | Hall K W                |
| 89842/1 | DLO  | Denning K R             |
| 89821/1 | DLO  | Moran A Mrs             |
| 90055/1 | DLO  | Browning P Mrs          |
| 91524/1 | DLO  | Easton C D              |
| 62043/3 | DO/W | Gloucester City Council |
| 88902/6 | DO   | Brewster D G Mrs        |
| 88997/1 | DO/W | Brown Christine Mrs     |
| 88998/1 | DO/W | Brown Brian Mr          |



Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

|         |       |                                 |
|---------|-------|---------------------------------|
| 89002/8 | DO    | Atterbury Clive Perkins & Janet |
| 88751/1 | DO    | Morris C & D                    |
| 88879/3 | DO    | Irving R W                      |
| 88826/1 | DO    | Bye Christina Mrs               |
| 89740/1 | DO    | Varnam B Mrs                    |
| 89739/1 | DO    | Varnam Emily                    |
| 89738/1 | DO    | Varnam Sam                      |
| 89737/1 | DO    | Varnam Ron Mr                   |
| 89736/1 | DO    | Hook Lesley                     |
| 88688/1 | DO    | Cridland Tony                   |
| 88598/2 | DO    | Bone Alan                       |
| 88079/4 | DO    | Eley R S Mr                     |
| 87287/2 | DO    | Price Margaret Christina        |
| 88890/1 | DO    | Hale William John               |
| 61998/1 | DS    | British Waterways               |
| 88079/5 | DO    | Eley R S Mr                     |
| 89745/8 | DO    | Cantwell M Mr                   |
| 89713/8 | DO    | Carpenter Barbara               |
| 89714/7 | DO    | Ginns Philippa                  |
| 90014/1 | DLO   | Reynolds L Mrs                  |
| 90241/1 | DLO   | Brookes A Mr & Mrs              |
| 90168/1 | DLO   | Wildfowl & Wetlands Trust       |
| 90143/1 | DLO   | Bailey D Mr                     |
| 90142/1 | DLO   | Bailey P Mr                     |
| 90151/1 | DLO   | Gillooly J Mrs                  |
| 90121/1 | DLO   | Shaw David Mr                   |
| 90157/1 | DLO   | Tandy D J                       |
| 90122/1 | DLO   | Trotman J Mr                    |
| 90120/1 | DLO/W | Charlton G Mr & Mrs             |
| 90671/1 | DLO   | Price Melanie                   |
| 90088/1 | DLO   | Linnett J Mrs                   |
| 90076/1 | DLO   | Hawkins Nigel & Gillian         |
| 90081/1 | DLO   | Hill Leslie J Mr                |
| 90086/1 | DLO   | Livall S R Mr                   |
| 90091/1 | DLO   | Smith Hilary                    |
| 90101/1 | DLO   | Bennett Henry A Mr              |
| 89824/1 | DLO   | Phillips R A Mr                 |
| 90102/1 | DLO   | Ponsford Susan Mrs              |
| 90103/1 | DLO   | Smith T                         |
| 90104/1 | DLO   | Livall T Mrs                    |
| 90105/1 | DLO/W | Tarr Peter & Josephine          |
| 90160/1 | DLO   | Turl J Mrs                      |
| 90162/1 | DLO   | Turl S                          |
| 90123/1 | DLO   | Washbourne E M                  |
| 90136/1 | DLO/W | Scott G H                       |
| 92405/1 | DLO   | Sharpness Play Group            |
| 90140/1 | DLO   | Rice A                          |
| 90167/1 | DLO   | Nash Dylan                      |
| 90191/1 | DLO   | Nash Chris                      |
| 89973/1 | DLO   | Pritchard Teresa A C Mrs        |
| 90119/1 | DLO   | Allen B Mrs                     |
| 89975/1 | DLO   | Williams Beryl L Miss           |
| 89980/1 | DLO   | Phillips M Mr                   |
| 89968/1 | DLO   | Tudor F E Mr                    |
| 89981/1 | DLO   | Pritchard P L J Dr              |
| 89989/1 | DLO   | Beard R, V, D & M               |
| 89992/1 | DLO   | Beard D E                       |
| 90019/1 | DLO   | Reynolds R Mr                   |

Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

|         |      |                                  |
|---------|------|----------------------------------|
| 90084/1 | DLO  | Goddard Peter Mr                 |
| 90129/1 | DLO  | Heeps A Mrs                      |
| 90174/1 | DLO  | Evans Jonathan & Gillian         |
| 90170/1 | DLO  | Sherman Raymond Mr               |
| 90172/1 | DLO  | Sherman Charlotte                |
| 90173/1 | DLO  | Sherman Julie                    |
| 90175/1 | DLO  | Brinkworth P                     |
| 90237/1 | DLO  | Ruther L A                       |
| 90211/1 | DLO  | Gibson Timothy Martin            |
| 90209/1 | DLO  | Pepperd C Mrs                    |
| 90206/1 | DLO  | Peake Chris                      |
| 90200/1 | DLO  | Nash Shirley                     |
| 90202/1 | DLO  | Holpin Gillian                   |
| 90203/1 | DLO  | Jones Mark                       |
| 90195/1 | DLO  | Browning D                       |
| 90199/1 | DLO  | Browning D Mrs                   |
| 90198/1 | DLO  | Nibllet D Mr                     |
| 89764/8 | DLO  | Greenman Peter Thomas & Felicity |
| 89772/8 | DLO  | Barr Jerry Mr                    |
| 89771/8 | DLO  | Rickette H Mrs                   |
| 89769/8 | DLO  | Brown G K                        |
| 89802/1 | DLO  | Ashford William Mr               |
| 89803/1 | DLO  | Turner M Mr & Mrs                |
| 89766/8 | DLO  | Westbrook S E Ms                 |
| 89804/8 | DLO  | Verey Chris                      |
| 88654/1 | DO   | French P Ms                      |
| 88653/8 | DO   | Fromly S D                       |
| 88652/8 | DO   | Grimster J A                     |
| 88651/8 | DO   | Brice Sheila J M                 |
| 88650/8 | DO   | Forrest G                        |
| 88347/1 | DO   | Smith A Mrs                      |
| 88346/1 | DO   | Gee C R Mr                       |
| 88344/1 | DO   | Gee K M Mrs                      |
| 88192/6 | DO   | Wildfowl & Wetlands Trust        |
| 88192/1 | DO   | Wildfowl & Wetlands Trust        |
| 88190/5 | DO   | Parfitt Alison                   |
| 62747/7 | DO/C | Lavell C Miss                    |
| 88386/8 | DO   | Ramsden Keith                    |
| 88384/8 | DO   | French Rheema                    |
| 88383/8 | DO   | McManns A & H                    |
| 88382/9 | DO   | Hawkins W H                      |
| 88382/8 | DO   | Hawkins W H                      |
| 88381/8 | DO   | Wiltshire S                      |
| 88362/8 | DO   | Evans S M                        |
| 88361/8 | DO   | Humble S Mrs                     |
| 88360/8 | DO   | Oakley Judith                    |
| 88359/8 | DO   | Bennett B                        |
| 88358/8 | DO   | Hawkes John & Maxine             |
| 88357/8 | DO   | O'Halloran Simon J K             |
| 88356/8 | DO   | Deproost Steven                  |
| 88355/1 | DO   | Martin D Mr                      |
| 88354/1 | DO   | Barnard D Mr                     |
| 88353/1 | DO   | Barnard W A Mrs                  |
| 88352/1 | DO   | Davis M Mrs                      |
| 88351/1 | DO   | Davis W Mr                       |
| 88349/1 | DO   | Davis E Miss                     |
| 88348/1 | DO   | Davis R Mr                       |
| 88377/8 | DO   | Wiltshire Richard                |

Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

|         |      |                               |
|---------|------|-------------------------------|
| 88376/8 | DO   | Occupier The                  |
| 88375/8 | DO   | Lucas J                       |
| 88374/8 | DO   | Hudson A Mrs                  |
| 88373/8 | DO   | Jeldin D                      |
| 88371/8 | DO/W | Sawtell J R                   |
| 88370/8 | DO   | Claridge Patricia             |
| 88369/8 | DO/W | Brinkworth M                  |
| 88368/8 | DO   | Hatter Bridgette              |
| 88367/8 | DO   | Bellamy P                     |
| 88365/8 | DO   | Powell-Tuck T                 |
| 88363/8 | DO   | Redmond G Mrs                 |
| 88138/8 | DO   | Sawdon B                      |
| 88392/8 | DO   | Pagan Jane                    |
| 88324/1 | DO   | Goddard C Mr                  |
| 88391/8 | DO   | Shott R Mr                    |
| 88388/8 | DO   | Richardson W L                |
| 88380/8 | DO   | Wiltshire Melanie J           |
| 88378/8 | DO   | Hejedus Christina             |
| 88151/8 | DO   | Perry G                       |
| 88150/8 | DO   | Withnell H Miss               |
| 88149/8 | DO   | Henstock P L                  |
| 88146/8 | DO   | Varah W O Mr & Mrs            |
| 88145/8 | DO   | Robinson Joy Mrs              |
| 88083/1 | DO   | Anonymous                     |
| 88144/8 | DO   | Tweedy M J Ms                 |
| 88143/8 | DO/W | Ibbotson H Mrs                |
| 88142/8 | DO   | Coleman J Mr                  |
| 88141/8 | DO   | Williams Liz                  |
| 88140/8 | DO   | McCubbins G                   |
| 88139/9 | DO   | Housden Helen C Mrs           |
| 88164/8 | DO   | Van Boeschoteu M Mrs          |
| 88163/8 | DO   | Baylis T Ms                   |
| 88162/8 | DO/W | Yearsley J V                  |
| 88161/8 | DO   | Ross E Mrs                    |
| 88160/8 | DO   | Fielding A W T Mr & Mrs       |
| 88158/8 | DO   | Allison James                 |
| 88157/8 | DO   | Crabb Elsie                   |
| 88156/8 | DO   | Pardoe R                      |
| 88155/8 | DO   | Williams Ursula               |
| 88154/8 | DO   | Harding U C                   |
| 88153/8 | DO/W | Fanthorpe & Dr R V Bailey U A |
| 88152/8 | DO   | Cordery Peter                 |
| 88079/2 | DO   | Eley R S Mr                   |
| 88078/1 | DO   | Tudor Vanessa Mrs             |
| 88042/8 | DO   | Faulkner Claire               |
| 88172/8 | DO/W | Kedde G                       |
| 88171/8 | DO   | Weavers B J Dr                |
| 88170/8 | DO   | Wiltshire Corinna Mrs         |
| 88169/8 | DO   | Kitson E G Mrs                |
| 88168/8 | DO   | Ochala A                      |
| 88166/8 | DO   | Cook L W Mr & Mrs             |
| 88165/8 | DO   | Daniels Liz                   |
| 88050/8 | DO/W | Dawson Bryan and Margaret     |
| 88051/8 | DO/W | Smith Audrey                  |
| 88052/8 | DO   | Mehta Rob & Jehanne           |
| 88055/8 | DO   | Shenwell D D                  |
| 88059/8 | DO   | Kromm Kathy                   |
| 88061/8 | DO   | Govier M F                    |

Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

|         |      |                            |
|---------|------|----------------------------|
| 88063/8 | DO   | Gregg C Mr                 |
| 88064/8 | DO   | Shaw-Maslin Sarah          |
| 88065/8 | DO   | Gunning Mrs                |
| 88067/8 | DO   | Edgington S                |
| 88066/8 | DO   | Shelley E Mrs              |
| 88034/8 | DO   | Jones R M                  |
| 88038/8 | DO   | Morris B D Mr & Mrs        |
| 88043/8 | DO   | Radford Ben                |
| 88044/8 | DO   | King E M Mrs               |
| 88022/8 | DO   | Grey A J                   |
| 88020/8 | DO   | Mowforth C W Dr            |
| 88024/8 | DO   | Jenkins E Miss             |
| 88040/8 | DO   | Richards Alex R            |
| 88045/8 | DO   | Roberts P J Mrs            |
| 88046/8 | DO   | Lovegrove Martin           |
| 88047/8 | DO   | Bilbrough H G Mr           |
| 88048/8 | DO   | Coleman Ron                |
| 88179/8 | DO   | Palmer Anna                |
| 88178/8 | DO   | Steeves-Booker Jill & Alan |
| 88177/8 | DO   | Dickenson L                |
| 88176/8 | DO   | Lane D A Ms                |
| 88175/8 | DO   | Relton Maxine              |
| 88174/8 | DO   | Marsh J M Mrs              |
| 88173/8 | DO   | Wyndham C Ms               |
| 88026/8 | DO   | Selwood H Mrs              |
| 88030/8 | DO   | Hards Sarah                |
| 88033/8 | DO/W | Guillebaud O H F           |
| 88035/8 | DO   | Johnson P E Mrs            |
| 88039/8 | DO   | Paget Keith                |
| 87950/6 | DO/W | Wyatt John                 |
| 87949/8 | DO   | Fernyhough A Mrs           |
| 61652/2 | DO   | Drew MP David Mr           |
| 86840/1 | DO   | Denning R T                |
| 87947/8 | DO   | Rose Henrietta & Nick      |
| 88135/8 | DO   | Coulton David              |
| 88185/8 | DO   | Williams A H               |
| 88184/8 | DO   | Stephens Joan E Mrs        |
| 88183/8 | DO   | Passey J Mrs               |
| 88182/8 | DO   | Pritchard G P Mr           |
| 88181/8 | DO   | Blencowe L Mrs             |
| 88180/8 | DO   | Hicks G K Mrs              |
| 87037/1 | DO   | Griffin Kirsty             |
| 86894/1 | DO/W | Leach Stephen Mr           |
| 87953/8 | DO   | Ryder Jane & Martin        |
| 87897/1 | DO   | Gadbury Elisabeth Ivy      |
| 87900/1 | DO   | Gadbury Peter James Mr     |
| 87714/1 | DO   | Vennell R Mr               |
| 87295/1 | DO   | Chivers Lorraine           |
| 87294/1 | DO   | Robinson James Dr          |
| 87287/1 | DO   | Price Margaret Christina   |
| 87290/1 | DO   | Price K E                  |
| 62041/4 | DO   | Stroud District Council    |
| 87944/8 | DO   | Crosby Claire Dr           |
| 87939/8 | DO   | Tovey Diana M.             |
| 87930/8 | DO   | Fryer W L Mr               |
| 87965/8 | DO   | Marshall A D               |
| 87957/1 | DO   | Hunt Jane                  |
| 87754/1 | DO   | Redford Gillian Miss       |

Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

|         |       |  |
|---------|-------|--|
| 88797/9 | RDO   | Federal Mogul Corporation              |
| 62637/6 | RDO   | Cory Environmental (Glos) Ltd          |
| 62043/6 | RDO   | Gloucester City Council                |
| 98640/9 | RDO   | Trustees of W. J Liddington (Deceased) |
| 66841/1 | RDS   | Funnell Mr and Mrs                     |
| 61998/4 | RDO   | British Waterways                      |
| 61843/1 | RDS   | Berkeley Town Council                  |
| 88079/1 | RDS   | Eley R S Mr                            |
| 61761/1 | RDS   | Hamfallow Parish Council               |
| 90089/1 | DLO   | Chilton Mark                           |
| 90085/1 | DLO   | John Shipp & Co Ltd                    |
| 90060/1 | DLO   | NFU Berkeley                           |
| 90058/1 | DLO   | Findlay Simon                          |
| 90095/1 | DLO   | Ruther E W & S Mr                      |
| 61761/1 | DLO   | Hamfallow Parish Council               |
| 90082/1 | DLO   | Chilton Angela                         |
| 90083/1 | DLO   | Shipp S M Mr                           |
| 90194/1 | DLO   | Browning V Mrs                         |
| 90245/1 | DLO   | Miles D Mr                             |
| 90251/1 | DLO   | Powell D M Grove & Mr Miss             |
| 90178/1 | DLO   | Hawley M                               |
| 90176/1 | DLO   | Bell Robin Mr                          |
| 95573/8 | DLO   | Lukas Catherine H                      |
| 90135/1 | DLO   | Browning D R Mrs                       |
| 87290/2 | DO    | Price K E                              |
| 95069/8 | DLO   | Sutton J Ms                            |
| 95045/8 | DLO   | James S M Mrs                          |
| 94947/8 | DLO   | Bryan Oda Thekla Mrs                   |
| 90069/1 | DLO   | Smith Mr & Mrs B & Kenton              |
| 90074/1 | DLO   | Harrison Helena                        |
| 89977/5 | DLO   | Kirby Jeff Dr                          |
| 89977/1 | DLO   | Kirby Jeff Dr                          |
| 90005/1 | DLO   | Phillips V C                           |
| 89972/1 | DLO   | Frith D J                              |
| 89928/1 | DLO   | Pearce Nicola Mrs                      |
| 89933/1 | DLO   | Pearce Andrew Mr                       |
| 89997/1 | DLO   | Carter C Mrs                           |
| 90100/1 | DLO   | Coleman Tim Knight & Tigre             |
| 90048/1 | DLO   | Davies J T & Angela J                  |
| 90053/2 | DLO   | Buckoke A J & E A                      |
| 90092/1 | DLO   | Hunter Sarah L                         |
| 90066/1 | DLO   | Gillett J W Mr                         |
| 89983/1 | DLO   | Jones S A                              |
| 89985/1 | DLO   | Farthing J M                           |
| 89994/1 | DLO   | Easingwood Norris Mr                   |
| 89999/1 | DLO   | Jones J Mrs                            |
| 90001/1 | DLO   | Palmer A G Mr                          |
| 90009/1 | DLO   | Firtchmard J                           |
| 90035/1 | DLO   | Jordan B Mrs                           |
| 90094/1 | DLO   | Steel Jonathan Cllr Dr                 |
| 90098/1 | DLO   | Reeves R Mrs                           |
| 89962/1 | DLO   | Wilson Caroline Mrs                    |
| 89961/1 | DLO/W | Sterry Hilary Mrs                      |
| 89963/1 | DLO   | Remnant G J Mr                         |
| 89986/1 | DLO/W | Cook C Mr                              |
| 89987/1 | DLO   | Langford H C Mr                        |
| 90007/1 | DLO   | Carter John Mr                         |
| 90027/1 | DLO   | Metcalf Philip Mr                      |

Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

|          |       |                              |
|----------|-------|------------------------------|
| 90031/1  | DLO   | Metcalf Catherine            |
| 90038/1  | DLO   | Sayers Claire Miss           |
| 90041/1  | DLO   | McDonald Steve Mr            |
| 90062/1  | DLO   | Sealey P & M Mr & Mrs        |
| 90064/1  | DLO   | Sayers Maisie Mrs            |
| 90096/15 | DLO   | Rice Phil Mr                 |
| 90068/1  | DLO   | Oates G Mr & Mrs             |
| 90183/1  | DLO   | Nash Velvet                  |
| 90158/1  | DLO   | Savage R J                   |
| 91523/8  | DLO   | Ruchbrooke J J               |
| 90097/1  | DLO   | Barnett H M B Mrs            |
| 90132/1  | DLO   | Dimery W F                   |
| 90063/1  | DLO   | Rea Colin G                  |
| 90182/1  | DLO   | Dunbabin R Mrs               |
| 90192/1  | DLO   | Hunt Billy                   |
| 90257/1  | DLO   | Thomas Stella                |
| 90180/1  | DLO   | Pinnell Ralph                |
| 90184/1  | DLO   | Miles O D                    |
| 90221/1  | DLO   | Williams J Mrs               |
| 89805/1  | DLO   | Ford J H Mr                  |
| 89815/1  | DLO   | Fryer G Mr                   |
| 89816/1  | DLO   | Nash M.A.Y.                  |
| 89819/1  | DLO   | Brookes J                    |
| 89818/1  | DLO   | Brough J M Ms                |
| 89817/1  | DLO   | Nash C A                     |
| 90212/1  | DLO   | Clift R                      |
| 90153/1  | DLO   | Clements J G & H G           |
| 89823/1  | DLO   | Bird D M G                   |
| 89965/2  | DLO   | Phillips M Mrs               |
| 89965/1  | DLO   | Phillips M Mrs               |
| 89966/1  | DLO   | Baker Christine              |
| 89969/1  | DLO   | Dickson W J Mr               |
| 89970/1  | DLO   | Hawley P A                   |
| 89755/8  | DLO   | Benn Kevin Mr                |
| 89752/8  | DLO   | Beloe Catherine              |
| 89765/1  | DLO   | Biddle A E & M B             |
| 89758/1  | DLO   | Phillips Sylvia              |
| 89756/1  | DLO   | Bridge Mike & Jane           |
| 90116/1  | DLO   | Andrews PJ Dr & Mrs          |
| 89753/1  | DLO   | Clutterbuck June Miss        |
| 90117/1  | DLO   | Ford B J Mrs                 |
| 89775/1  | DLO/W | Morgan C E Mr                |
| 90115/1  | DLO   | Spreag Robin Mr              |
| 89748/1  | DLO   | Collett R Mr & Mrs           |
| 90114/1  | DLO   | Porter Jacqueline & Nicholas |
| 89777/1  | DLO   | Crews June                   |
| 90108/1  | DLO   | Jones J M & H R T            |
| 89779/1  | DLO   | Thomas D Mr & Mrs            |
| 89781/1  | DLO   | Lane M E F Mr & Mrs          |
| 89797/1  | DLO   | Reeves C A & H E             |
| 90107/1  | DLO   | Boon Alix                    |
| 90193/1  | DLO   | Woodward V Mrs               |
| 90217/1  | DLO   | Turl A J                     |
| 89785/1  | DLO   | Sears J R D                  |
| 89798/1  | DLO   | Eldridge Mark Mr             |
| 89799/1  | DLO   | Ashford Suzanne              |
| 90215/1  | DLO   | Hunt Bob                     |
| 89760/8  | DLO/W | Mildmay Crystal              |

Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

|         |       |                                 |
|---------|-------|---------------------------------|
| 89801/1 | DLO   | Ashford Madeline                |
| 89763/8 | DLO/W | Pealing S Mr                    |
| 90057/1 | DLO   | Heylings M.R.                   |
| 90181/1 | DLO   | Turl E                          |
| 90159/1 | DLO   | Walker A B Mr                   |
| 89926/1 | DLO   | Wiltshire D Mr & Mrs            |
| 90128/1 | DLO   | Heeps John                      |
| 89932/1 | DLO   | Summers M Mrs                   |
| 89920/1 | DLO   | Frape L & J Mr & Mrs            |
| 90079/1 | DLO   | Cullimore Mary & Philip         |
| 90072/1 | DLO   | Bruton M Mrs                    |
| 89978/1 | DLO/W | Wilkinson E Mrs                 |
| 89984/1 | DLO/W | Berry Patrick, Lynne & Andrew   |
| 90179/1 | DLO   | Proctor J Mr                    |
| 90133/1 | DLO   | Graham Beverly & David          |
| 90205/1 | DLO   | Smith E N Mrs                   |
| 90204/1 | DLO   | Smith J C Mr                    |
| 90177/1 | DLO   | Proctor J Mrs                   |
| 90093/1 | DLO   | Lammastide Inn                  |
| 89886/1 | DLO   | Brown Shaun Mr                  |
| 89882/1 | DLO   | Brown K Mrs                     |
| 89879/1 | DLO   | Reece Lynne                     |
| 89869/1 | DLO   | Reece Stuart Mr                 |
| 89865/1 | DLO   | King Patrick Mr                 |
| 89861/1 | DLO   | King Tina Mrs                   |
| 94638/8 | DLO   | Melvin L Mr                     |
| 92959/1 | DLO   | Collett Roy Mr                  |
| 90155/1 | DLO   | Stump R Mr                      |
| 90164/1 | DLO   | Turl P Mr                       |
| 90067/1 | DLO   | Jones Kate Webb & Len           |
| 90169/1 | DLO   | Nash Georgia                    |
| 90165/1 | DLO   | Nash Emily                      |
| 90163/1 | DLO   | Nash Catherine                  |
| 90052/8 | DLO   | Luckett M K                     |
| 89982/8 | DLO   | Rowson Fiona                    |
| 90099/8 | DLO   | Allan Christie                  |
| 90118/8 | DLO/W | Dabinett Jean Miss              |
| 90106/8 | DLO   | Hodge Jessica                   |
| 90138/8 | DLO   | Anonymous (Illegible Signature) |
| 90126/8 | DLO   | Lloyd Amy Perry & Julian        |
| 90147/1 | DLO   | Bailey C A Mrs                  |
| 90678/8 | DLO   | Clemeson Hilary                 |
| 90134/8 | DLO   | Croxall Elinor                  |
| 90197/1 | DLO   | Clark B Mrs                     |
| 89715/7 | DO    | Ginns Elisabeth                 |
| 61768/2 | DO    | Friends of the Earth (FoD)      |
| 88895/1 | DO    | Leach Terry                     |
| 89724/1 | DO    | Menelaws A N Miss               |
| 89716/1 | DO    | Church D Mrs                    |
| 89728/1 | DO    | Couldron Murial E.              |
| 89742/1 | DO    | Chamberlain Jean                |
| 89712/1 | DO    | Pearson June                    |
| 88889/1 | DO    | Denning Murray                  |
| 89058/8 | DO    | Kelly S Mrs                     |
| 89057/8 | DO    | Marsh Nicola                    |
| 88886/1 | DO    | Pullin Phyllis                  |
| 89056/8 | DO    | Jenner Mr & Mrs                 |
| 88887/1 | DO    | Denning Eileen                  |

Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

|          |             |                                      |
|----------|-------------|--------------------------------------|
| 88888/1  | DO          | Denning Philip                       |
| 89055/8  | DO          | Simonon Lin                          |
| 88797/1  | DO          | Federal Mogul Corporation            |
| 88744/1  | DO/W62043/3 | Howard Tenens Associates Ltd         |
| 88748/1  | DO          | Cousins A B Mr                       |
| 88746/1  | DO          | Cousins H J Mrs                      |
| 88904/2  | DO          | Brown Margaret                       |
| 88893/1  | DO          | Cordes Margaret Doreen               |
| 88891/9  | DO          | Billings-Ferrand Jaqueline A The Hon |
| 88892/1  | DO          | Cordes Henry Sidney                  |
| 89063/9  | DO          | Medcalf Hilary Mrs                   |
| 62013/8  | DO/W        | English Nature                       |
| 89050/8  | DO          | Judd S Venn & Suzanne                |
| 89049/8  | DO          | Easton-Lawrence Sandra               |
| 89048/8  | DO          | Grendon J Mr                         |
| 88745/1  | DO          | Kane John Patrick                    |
| 89133/1  | DO          | Kemp A T                             |
| 61802/1  | DO          | Hinton Parish Council                |
| 62569/20 | DO/W        | Environment Agency                   |
| 88919/8  | DO          | Jarvis R                             |
| 88918/8  | DO          | Haussherr A Miss                     |
| 88917/8  | DO          | Palmer Joyce K                       |
| 88916/8  | DO          | Teague P R                           |
| 88915/8  | DO          | Sycamore Angela                      |
| 88913/8  | DO/W        | Goldring D                           |
| 88912/8  | DO          | Lewis H R Mr                         |
| 89001/8  | DO          | Colson A J                           |
| 89000/7  | DS          | Moggridge Hal                        |
| 88999/1  | DO          | Martin A R Mrs                       |
| 88819/8  | DO          | Lezard T W J                         |
| 88942/8  | DO          | Crabb West, Lawlor &                 |
| 88940/8  | DO          | Thornhill Alan                       |
| 88938/8  | DO          | Burrough I S & W                     |
| 88937/8  | DO          | Britton Maria                        |
| 89023/8  | DO          | Wedgbury Kay Ms                      |
| 89018/8  | DO          | Bamyard J & M R                      |
| 89015/8  | DO          | Wright A R Mrs                       |
| 89014/8  | DO          | Rasien H                             |
| 89011/8  | DO          | Kennedy Norah                        |
| 88906/8  | DO          | Etheridge M Mrs                      |
| 88936/8  | DO          | Howell John J                        |
| 88932/1  | DO          | Lamb Ted                             |
| 62040/1  | DO          | Forest of Dean District Council      |
| 88922/1  | DO          | Boyce M Mr                           |
| 88921/1  | DO          | Boyce Matthew Mr                     |
| 88920/1  | DO          | Boyce B Mrs                          |
| 88396/8  | DO          | Smith Carla                          |
| 88325/1  | DO          | Goddard J Mrs                        |
| 88395/8  | DO          | Fletcher B A Ms                      |
| 88394/8  | DO          | Lindop Jenny                         |
| 88598/1  | DO          | Bone Alan                            |
| 62063/8  | DO/W        | Swindon Borough Council              |
| 88393/8  | DO          | Parker Barbara G B                   |
| 88927/1  | DO          | Newton A C Mrs                       |
| 88926/1  | DO          | Smith G H                            |
| 88925/1  | DO          | Rogerson L J Miss                    |
| 88924/1  | DO          | Kynaston I L                         |
| 88639/1  | DO          | Price Hannah Miss                    |



**Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report**

|         |      |                                |
|---------|------|--------------------------------|
| 66841/1 | DO   | Funnell Mr and Mrs             |
| 62016/4 | DO   | Gloucestershire Wildlife Trust |
| 88399/8 | DO   | Daunt Marian Mrs               |
| 88327/1 | DO   | Vaughan Kenneth John           |
| 88534/1 | DO/W | Morgan M Mrs                   |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support  
D= Deposit; R= Revised Deposit

**Figure 7: Chapter 4 – Site 7**

**Comments**

| Comments No. | Status (See Key) | Name                          |
|--------------|------------------|-------------------------------|
| 88314/1      | DO               | Coother E L Mrs               |
| 65394/1      | DO               | Moreton in Marsh Charity      |
| 66189/1      | DO               | Cotswold Seeds Limited        |
| 88314/2      | DO               | Coother E L Mrs               |
| 89127/1      | DO/W             | Scanell D Mrs                 |
| 89125/1      | DO               | James D Mrs                   |
| 89122/1      | DO               | Nigerced Anne                 |
| 89120/1      | DO               | Wilkinson G Mrs               |
| 89118/1      | DO               | Barrett J                     |
| 89116/1      | DO               | Evans P Mrs                   |
| 89113/1      | DO               | Cus J H                       |
| 89112/1      | DO               | Smith M J                     |
| 89109/1      | DO               | Paisit Doris Mrs              |
| 89077/1      | DO               | Allen Peter R                 |
| 89076/1      | DO               | Otley L Mrs                   |
| 89075/1      | DO               | Murray Brenda                 |
| 89074/1      | DO               | Murray S Mrs                  |
| 89073/1      | DO               | Fowler R A                    |
| 89072/1      | DO               | Davis Michael Mr & Mrs        |
| 89071/1      | DO               | Einon D Mr & Mrs              |
| 89070/1      | DO               | Hardiman E P E                |
| 62011/1      | DO               | Thames Water Board            |
| 66201/1      | DO               | Packwood Estates Limited      |
| 61917/1      | DO               | Moreton in Marsh Town Council |
| 89094/1      | DO               | Payne P Mrs                   |
| 89092/1      | DO               | Peach Marion                  |
| 89089/1      | DO               | Pratley D B Mrs               |
| 89086/1      | DO               | Miles G T & E                 |
| 89084/1      | DO               | Sillence E                    |
| 89082/1      | DO               | Sidebotham J Mr               |
| 89080/1      | DO               | Bartlett Olive Mrs            |
| 89079/1      | DO               | Bartlett William              |
| 89814/4      | DO               | Porsche Club Great Britain    |
| 89814/2      | DO               | Porsche Club Great Britain    |
| 89814/1      | DO               | Porsche Club Great Britain    |
| 62042/3      | DO               | Cotswold District Council     |
| 61917/2      | DO               | Moreton in Marsh Town Council |
| 89826/4      | DO               | NMB Group Plc                 |
| 89125/2      | DO               | James D Mrs                   |
| 89064/1      | DO               | Bugler D Mr & Mrs             |

Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

|         |     |                          |
|---------|-----|--------------------------|
| 89757/1 | DLO | Eden Robb                |
| 89826/1 | DO  | NMB Group Plc            |
| 89106/1 | DO  | Russell Betty            |
| 89104/1 | DO  | Adams N Mr               |
| 89103/1 | DO  | Cowley W Mrs             |
| 89100/1 | DO  | Gore W Mrs               |
| 89099/1 | DO  | McCauley E               |
| 89097/1 | DO  | Wroe Teresa & Kevin      |
| 89096/1 | DO  | Peachey A J              |
| 89095/1 | DO  | Lane L                   |
| 66201/5 | DO  | Packwood Estates Limited |
| 89065/1 | DO  | Zamojski S               |
| 89066/1 | DO  | Newport Doreen Mrs       |
| 89069/1 | DO  | Osborne Lee              |
| 89067/1 | DO  | Davis Eva Mrs            |
| 88620/1 | DO  | Honour A Mr & Mrs        |
| 66201/3 | DO  | Packwood Estates Limited |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support

D= Deposit; R= Revised Deposit

**Figure 8: Chapter 5 – Policy 4**

**Comments**

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 88590/2      | DO               | Croft S Mrs                            |
| 90206/2      | DLO              | Peake Chris                            |
| 90200/2      | DLO              | Nash Shirley                           |
| 90202/2      | DLO              | Holpin Gillian                         |
| 90203/2      | DLO              | Jones Mark                             |
| 90195/2      | DLO              | Browning D                             |
| 90199/2      | DLO              | Browning D Mrs                         |
| 90198/2      | DLO              | Niblett D Mr                           |
| 89816/2      | DLO              | Nash M.A.Y.                            |
| 90184/2      | DLO              | Miles O D                              |
| 90221/2      | DLO              | Williams J Mrs                         |
| 90237/2      | DLO              | Ruther L A                             |
| 88826/2      | RDS              | Bye Christina Mrs                      |
| 88327/2      | RDS              | Vaughan Kenneth John                   |
| 90169/2      | DLO              | Nash Georgia                           |
| 90165/2      | DLO              | Nash Emily                             |
| 90163/2      | DLO              | Nash Catherine                         |
| 65393/6      | DO               | Cypher S N Mr                          |
| 88192/7      | DO/W             | Wildfowl & Wetlands Trust              |
| 62073/5      | DO               | Wiltshire County Council               |
| 88079/1      | DO               | Eley R S Mr                            |
| 65979/8      | DO               | Lafarge Redland Aggregates Ltd         |
| 62613/8      | DO               | Hempsted Residents Association         |
| 87715/2      | DO               | Arlington Property Developments Ltd    |
| 62012/6      | DO               | Highways Agency                        |
| 61775/9      | DO               | Prestbury Parish Council               |
| 99020/9      | RDS              | Chaplin S M Mrs                        |
| 62637/12     | RDO              | Cory Environmental (Glos) Ltd          |
| 62043/10     | RDO              | Gloucester City Council                |
| 98640/12     | RDO              | Trustees of W. J Liddington (Deceased) |

Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

|          |       |  |
|----------|-------|--|
| 98640/11 | RDO   | Trustees of W. J Liddington (Deceased) |
| 88797/12 | RDO   | Federal Mogul Corporation              |
| 88797/11 | RDO   | Federal Mogul Corporation              |
| 62063/4  | RDO   | Swindon Borough Council                |
| 61998/8  | RDO   | British Waterways                      |
| 88538/2  | RDS   | Westbury Homes Ltd                     |
| 61775/6  | RDO   | Prestbury Parish Council               |
| 62542/3  | RDO/W | Environmental Services Assoc.          |
| 88713/9  | RDS   | Friends of the Earth (Gloucestershire) |
| 88713/6  | RDS   | Friends of the Earth (Gloucestershire) |
| 87715/2  | RDS   | Arlington Property Developments Ltd    |
| 88537/1  | RDS   | Bovis Homes Ltd                        |
| 62005/10 | RDS   | Countryside Agency                     |
| 62073/2  | RDO   | Wiltshire County Council               |
| 65984/2  | RDO/W | Lydney Land Resources                  |
| 90085/2  | DLO   | John Shipp & Co Ltd                    |
| 90082/2  | DLO   | Chilton Angela                         |
| 90083/2  | DLO   | Shipp S M Mr                           |
| 90194/2  | DLO   | Browning V Mrs                         |
| 90245/2  | DLO   | Miles D Mr                             |
| 90251/2  | DLO   | Powell D M Grove & Mr Miss             |
| 90178/2  | DLO   | Hawley M                               |
| 90176/2  | DLO   | Bell Robin Mr                          |
| 89977/7  | DLO   | Kirby Jeff Dr                          |
| 89997/2  | DLO   | Carter C Mrs                           |
| 90100/2  | DLO   | Coleman Tim Knight & Tigre             |
| 90089/2  | DLO   | Chilton Mark                           |
| 89987/2  | DLO   | Langford H C Mr                        |
| 90007/2  | DLO   | Carter John Mr                         |
| 90068/2  | DLO   | Oates G Mr & Mrs                       |
| 90183/2  | DLO   | Nash Velvet                            |
| 90182/2  | DLO   | Dunbabin R Mrs                         |
| 90192/2  | DLO   | Hunt Billy                             |
| 90257/2  | DLO   | Thomas Stella                          |
| 90180/2  | DLO   | Pinnell Ralph                          |
| 90147/2  | DLO   | Bailey C A Mrs                         |
| 90197/2  | DLO   | Clark B Mrs                            |
| 90143/2  | DLO   | Bailey D Mr                            |
| 90142/2  | DLO   | Bailey P Mr                            |
| 90151/2  | DLO   | Gillooly J Mrs                         |
| 90091/2  | DLO   | Smith Hilary                           |
| 90101/2  | DLO   | Bennett Henry A Mr                     |
| 90102/2  | DLO   | Ponsford Susan Mrs                     |
| 90167/2  | DLO   | Nash Dylan                             |
| 90191/2  | DLO   | Nash Chris                             |
| 90170/2  | DLO   | Sherman Raymond Mr                     |
| 90172/2  | DLO   | Sherman Charlotte                      |
| 90173/2  | DLO   | Sherman Julie                          |
| 90175/2  | DLO   | Brinkworth P                           |
| 90211/2  | DLO   | Gibson Timothy Martin                  |
| 90209/2  | DLO   | Pepperd C Mrs                          |
| 89817/2  | DLO   | Nash C A                               |
| 89831/2  | DLO   | Boobyer P & V                          |
| 89829/2  | DLO   | Nelmes D Mrs                           |
| 90212/2  | DLO   | Clift R                                |
| 90196/2  | DLO   | Browning A W Mr                        |
| 89775/2  | DLO/W | Morgan C E Mr                          |
| 90107/2  | DLO   | Boon Alix                              |

Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

|          |      |  |
|----------|------|--|
| 90193/2  | DLO  | Woodward V Mrs                         |
| 88826/2  | DO   | Bye Christina Mrs                      |
| 62637/6  | DO/W | Cory Environmental (Glos) Ltd          |
| 88663/2  | DO   | Allstone Sand & Gravels                |
| 62013/10 | DO/W | English Nature                         |
| 88537/2  | DO   | Bovis Homes Ltd                        |
| 88538/2  | DO   | Westbury Homes Ltd                     |
| 62040/2  | DO   | Forest of Dean District Council        |
| 88713/33 | DO   | Friends of the Earth (Gloucestershire) |
| 90217/2  | DLO  | Turl A J                               |
| 90215/2  | DLO  | Hunt Bob                               |
| 89718/2  | DO   | Ramsey H P Mr                          |
| 89806/2  | DS   | Wellington Park Properties Ltd         |
| 88658/15 | DO   | Hannaford John                         |
| 62542/7  | DO   | Environmental Services Assoc.          |
| 89808/12 | DO   | Robert Hitchins Ltd                    |
| 62043/18 | DO   | Gloucester City Council                |
| 88823/3  | DO   | Du Pont (UK) Ltd                       |
| 88316/1  | DO   | Ketley Andrew                          |
| 62063/11 | DO   | Swindon Borough Council                |
| 88593/2  | DO   | Sollars Dennis                         |
| 61850/2  | DS   | Dursley Town Council                   |
| 60509/11 | DS   | Grundon (Waste) Ltd                    |
| 88592/2  | DO   | Sollars Mary                           |
| 61777/2  | DO   | Haresfield Parish Council              |
| 89723/2  | DO   | Moody H Mrs                            |
| 88662/7  | DO   | Phelps Bros                            |
| 88797/2  | DO   | Federal Mogul Corporation              |
| 65984/3  | DO/W | Lydney Land Resources                  |
| 88744/2  | DO/W | Howard Tenens Associates Ltd           |
| 62569/22 | DO/W | Environment Agency                     |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support

D= Deposit; R= Revised Deposit

**Figure 9: Chapter 5 – Policy 5**

**Comments**

| Comments No. | Status (See Key) | Name                                   |
|--------------|------------------|--|
| 62063/12     | DO               | Swindon Borough Council                |
| 88713/34     | DS               | Friends of the Earth (Gloucestershire) |
| 88664/2      | DO               | Horton Road Depot Objectors Consortium |
| 65393/7      | DO               | Cypher S N Mr                          |
| 62073/6      | DO               | Wiltshire County Council               |
| 62613/9      | DO               | Hempsted Residents Association         |
| 62012/7      | DO               | Highways Agency                        |
| 61775/10     | DO               | Prestbury Parish Council               |
| 99020/10     | RDO              | Chaplin S M Mrs                        |
| 62637/13     | RDO              | Cory Environmental (Glos) Ltd          |
| 62043/11     | RDO              | Gloucester City Council                |
| 98640/17     | RDO              | Trustees of W. J Liddington (Deceased) |
| 98640/15     | RDO              | Trustees of W. J Liddington (Deceased) |
| 98640/13     | RDO              | Trustees of W. J Liddington (Deceased) |
| 88797/17     | RDO              | Federal Mogul Corporation              |

Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

|          |       |  |
|----------|-------|--|
| 88797/15 | RDO   | Federal Mogul Corporation              |
| 88797/13 | RDO   | Federal Mogul Corporation              |
| 62044/2  | RDO   | Tewkesbury Borough Council             |
| 62063/5  | RDO   | Swindon Borough Council                |
| 61998/9  | RDO   | British Waterways                      |
| 88538/3  | RDO   | Westbury Homes Ltd                     |
| 62012/5  | RDO   | Highways Agency                        |
| 92199/2  | RDO   | Douglas Julie                          |
| 62542/2  | RDO/C | Environmental Services Assoc.          |
| 88713/10 | RDS   | Friends of the Earth (Gloucestershire) |
| 88713/7  | RDS   | Friends of the Earth (Gloucestershire) |
| 88905/2  | RDS   | Reeves C                               |
| 98701/2  | RDO   | Simpson C Mrs                          |
| 87715/4  | RDO   | Arlington Property Developments Ltd    |
| 88537/3  | RDO   | Bovis Homes Ltd                        |
| 62073/3  | RDO/W | Wiltshire County Council               |
| 61850/2  | RDO   | Dursley Town Council                   |
| 61985/2  | DLO   | Elmstone Hardwicke Parish Council      |
| 90096/17 | DLS   | Rice Phil Mr                           |
| 61849/2  | RDO   | Badgeworth Parish Council              |
| 88658/16 | DO    | Hannaford John                         |
| 89808/11 | DO    | Robert Hitchins Ltd                    |
| 89808/5  | DO    | Robert Hitchins Ltd                    |
| 62043/20 | DO    | Gloucester City Council                |
| 89843/2  | DO    | Dowty Group Plc                        |
| 88642/2  | DO    | Messier-Dowty Limited                  |
| 88827/3  | DO    | Dean J Mr                              |
| 88662/8  | DO    | Phelps Bros                            |
| 61605/2  | DO    | Boddington Parish Council              |
| 62637/9  | DO    | Cory Environmental (Glos) Ltd          |
| 88797/6  | DO    | Federal Mogul Corporation              |
| 88797/3  | DO    | Federal Mogul Corporation              |
| 62040/3  | DO    | Forest of Dean District Council        |
| 88644/2  | DO    | Alfred McAlpine Developments Ltd       |
| 63118/2  | DO    | Uckington Parish Council               |

**Key:** O= Objection; C = Conditionally Withdrawn; W= Unconditionally Withdrawn; S= Support; LO= Late Objection; LS= Late Support

D= Deposit; R= Revised Deposit



## INQUIRY APPEARANCES

### FOR THE WASTE PLANNING AUTHORITY

|  |  |
|--|--|
| Mr P Wadsley of Counsel MA, LLM (Cantab),<br>Postgraduate Certificate in Environmental Law | St Johns Chambers, Small Street,<br>Bristol, BS1 1DW |
|--|--|

|   |  |
|---|--|
| Ms J Evans of Counsel LLB(Hons), MPhil (Cantab)<br>Planning & Environmental Law | St Johns Chambers, Small Street,<br>Bristol, BS1 1DW |
|---|--|

They called (listed in alphabetical order):

|  |  |
|--|--|
| Ms A Banks BA(Hons), MSc   | Principal Waste Management Consultant,<br>Jacobsgibb Ltd, Turin Court, Bird Hall Lane,<br>Stockport, Cheshire, SK3 0XF |
| Mr M A Carr BA(Hons), Diploma in Ecology &<br>Management of the Natural<br>Environment | Ecological Consultant, c/o Conservation<br>Consultancy, 342 Bloomfield Road, Bath, B2 2PR                              |
| Mr A Cave BA, FRICS, FRTPI, FIM, FRSA  | Director of Planning & Economics, Chesterton plc,<br>84 Colmore Row, Birmingham, B3 2HG                                |
| Mr N Croft BSc, DipTP, MSc, MRTPI  | Senior Planning Officer with the County Council  |
| Mr T Holton DipLUS, DipTP, MRTPI   | Unit Manager, Local Plans and Development, with<br>The County Council  |
| Mr P Lord  | Area Manager, Development Coordination Unit,<br>with the County Council  |
| Mr K Phillips BSc, BTP, MRTPI  | Principal Planning Officer with the County Council   |

### OBJECTORS WHO PARTICIPATED IN ROUND TABLE SESSIONS (listed in alphabetical order):

#### FOR ARLINGTON PROPERTY DEVELOPMENTS LTD

|                                    |  |
|------------------------------------|--|
| Mr T Hancock BA, MPhil, DMS, MRTPI | Director, Terence O'Rourke plc, Everdene House, Wessex<br>Fields, Deansleigh Road, Bournemouth, Dorset,<br>BH7 7DU |
|------------------------------------|--|

#### FOR CORY ENVIRONMENTAL LTD

|            |  |
|------------|--|
| Mr A Judge | General Manager, Cory Environmental (Gloucestershire)<br>Ltd, Phoenix House,<br>Tewkesbury Road, Elmstone Hardwicke,<br>Cheltenham, GL51 9SY |
|------------|--|

#### FOR ENVIRONMENT AGENCY

|                       |   |
|-----------------------|---|
| Dr R Wade PhD, FCIWEN | Environment Planning Manager, Lower Severn Area,<br>Environment Agency, Riversmeet House,<br>Newton Industrial Estate, Northway Lane,<br>Tewkesbury, Glos, GL20 8JG |
|-----------------------|---|

**FOR FRIENDS OF THE EARTH (Glos)**

Mr A Watson BSc(Hons), CEng

Public Interest Consultants, Oakleigh, Wernffrwd, Gower,  
Swansea, SA4 3TY

**FOR S GRUNDON (EWELME) LTD**

Mr P Wormald BSc(Hons), DipTP, MRTPI,  
MIWM, MIQ

Estates Surveyor, S Grundon (Services) Ltd,  
Estates Office, Grange Lane, Beenham,  
Berks, RG7 5PY

**FOR HEMPSTED RESIDENTS ASSOCIATION**

Mr J Newell BSc (Hons), Ceng, FICChemE, ARCS

Hempsted House, Rectory Lane, Hempsted, Gloucester,  
GL2 5LW

**FOR HIGHWAYS AGENCY**

Mr P Johnson

Associate, Colin Buchanan & Partners,  
23 Trenchard St, Bristol, BS1 5AN

**FOR VISION 21**

Mr C Harmer

Vision 21, 30 St George's Place, Cheltenham,  
Glos, GL50 3JZ

**OTHER OBJECTORS IN ORDER OF FIRST APPEARANCE:**

**FOR ROBERT HITCHINS LTD**

Mr P Hardwick BA(Hons), MRTPI

Planning Manager, Robert Hitchins Ltd, The Manor,  
Boddington, Cheltenham, Glos, GL51 0TJ

**FOR STOKE ORCHARD PARISH COUNCIL**

Councillor Mrs C Adamson (Chair)

c/o Deanside, Dean Lane, Stoke Orchard,  
Glos, GL52 7RX

**FOR TEWKESBURY BOROUGH COUNCIL**

Ms L Belfield BA, MRTPI

Local Plans Officer Tewkesbury Borough Council,  
Council Offices, Gloucester Road, Tewkesbury,  
Glos, GL20 5TT

Mr M Reep BSc, DipTP, MRTPI

Principal Local Plan Officer, Tewkesbury B C

On her 2<sup>nd</sup> appearance Ms Belfield was called  
as witness by:

Mr T Clark BSc, BA(Law)

Principal Solicitor, Tewkesbury B C

**FOR FRIENDS OF THE EARTH (Forest of Dean)**

Mrs M K Newton BA(Hons)

Planning Officer for FOE (FoD), The Grove,  
Elton Road, Newnham-on-Severn, Glos, GL14 1JY

On her 2<sup>nd</sup> appearance Mrs Newton was called  
as witness by:



Ms K Olley of Counsel

instructed by Mr S Humber, Leigh Day & Co Solicitors,  
Priory House, St John's Lane, London, EC1M 4LB

**FOR NMB GROUP PLC & PORSCHE CLUB GREAT BRITAIN**

Mr J B Hargreaves DipTP, MRTPI

Director, Woods Hardwick Planning,  
17 Goldington Road, Bedford, MK40 3NH

**FOR COTSWOLD DISTRICT COUNCIL**

Mr C J Lewis DipTP, MRTPI

Planning Officer, Forward Planning Team,  
Cotswold District Council, Trinity Road,  
Cirencester, Glos, GL7 1PX

**ON HIS OWN BEHALF**

Mr D Drew MP

17 Quietways, Stonehouse, Glos, GL10 2NW

**FOR CORY ENVIRONMENTAL LTD AND BRITISH WATERWAYS**

Mr H Richards of Counsel,

5 Fountain Court, Birmingham, instructed by  
Ms A Dugdale

He called:

Ms A Dugdale MRTPI

Planning & Development Manager,  
Cory Environmental Ltd, Greyfriars Business Park,  
Frank Foley Way, Stafford, ST16 2ST

**FOR FOREST OF DEAN DISTRICT COUNCIL**

Mr N Gibbons BSc, MRTPI

Principal Planning Officer, Forward Plan,  
Forest of Dean District Council, Council Offices,  
High Street, Coleford, Glos, GL16 8HG

**FOR BOVIS HOMES LTD AND WESTBURY HOMES LTD**

Mr A Kelly of Queen's Counsel

2 Harcourt Buildings, Temple, London, EC4Y 9DB  
instructed by Mr J Standen

He called:

Mr J Standen BSc, FRICS, FIQ, MIWM

Minerals and Waste Management Surveyor,  
The Barton Willmore Planning Partnership – Northern,  
Suite 10E, Josephs Well, Hanover Walk, Leeds, LS3 1AB

**FOR ARLINGTON PROPERTY DEVELOPMENTS LTD**

Mr D Cooper, Solicitor

Partner, Gouldens Solicitors, 10 Old Bailey,  
London, EC4M 7NG

He called:

Mr T Hancock BA, MPhil, DMS, MRTPI

Director, Terence O'Rourke plc, Everdene House, Wessex  
Fields, Deansleigh Road, Bournemouth, Dorset,  
BH7 7DU

Mr D J Sandbrook BSc, FRICS, FIQ

Director, Voaden Sandbrook Ltd, The Old Rectory,  
Windsor End, Beaconsfield, Bucks, HP9 2JW

Mr J G Donald BSc, FRICS

Partner, Strutt & Parker (Commercial), 13 Hill Street,  
London, W1J 5LQ

**FOR VISION 21**

Mr G Stanley MA(Oxon), AMIEE

Vision 21, 30 St George's Place, Cheltenham, GL50 3JZ

## INQUIRY ADMINISTRATION DOCUMENTS

|          |  |
|----------|--|
| INQ1/1   | Pre-Inquiry Meeting (PIM) Attendance Sheets  |
| INQ1/2   | Inquiry Attendance Sheets  |
| INQ2/1-4 | Correspondence (via Programme Officer) between WPA Legal Officer and Inquiry Inspector (June-September, 2001)                            |
| INQ3/1-7 | Correspondence from Programme Officer to all Respondents to the Plan, sent out prior to PIM (June, 2001)                                 |
| INQ4/1-8 | Correspondence from Programme Officer to all Respondents to the Plan, sent out following PIM (August, 2001)                              |
| INQ5/1-4 | Correspondence from Programme Officer to Respondents to the Revised Plan (August, 2001)  |
| INQ6/1-2 | Letter and Notice of Public Local Inquiry, sent by WPA to all Respondents to the Plan (August, 2001)                                     |
| INQ7     | Letter of Invitation to Round Table Sessions, sent by Programme Officer (27 September, 2001)   |
| INQ8     | Letter plus attachment from WPA to Inspector (via Programme Officer) re Clarification of Withdrawn Objections (21 January, 2002)         |
| INQ9/1-2 | Correspondence between Cory Environmental Ltd and Programme Officer re Round Table Session on Waste Management Methods (September, 2001) |
| INQ10    | Inspector's Schedule Referencing Report (WPA, November, 2001)  |
| INQ11    | Bundle of E-mail Messages between WPA and Programme Officer re Programming Issues (September-October, 2001)                              |
| INQ12    | Notification of Closing Date of Inquiry, sent by Programme Officer to all Objectors who appeared at Inquiry (30 November, 2001)          |
| INQ13    | Inspector's Note of the Pre-Inquiry Meeting held on 6 August 2001  |
| INQ14    | Schedules of Duly Made Objections to Deposit & Revised Deposit Plans   |



## CORE DOCUMENTS

### **CD01-19 Gloucestershire County Council Plans and associated documents**

|        |   |
|--------|---|
| CD01   | Revised Deposit Draft Gloucestershire Waste Local Plan (April, 2001)  |
| CD02   | Deposit Draft Gloucestershire Waste Local Plan (August, 2000)   |
| CD03   | Pre Deposit Consultation Draft Gloucestershire Waste Local Plan (October, 1999)                                   |
| CD04   | Gloucestershire Structure Plan Second Review (17 <sup>th</sup> November, 1999)                                    |
| CD05   | Statements of Conformity of Proposals with the Structure Plan Deposit Stage (12 <sup>th</sup> August, 1999)       |
| CD06   | Statement of Conformity of Proposals with the Structure Plan Revised Deposit Stage (23 <sup>rd</sup> April, 2001) |
| CD07   | Gloucestershire County Council, Environment Department "Planning Enforcement and Monitoring Policy" (2000)        |
| CD08   | Waste Local Plan Strategic Environmental Appraisal - Consultation Draft (Oct, 1999)                               |
| CD09   | Waste Local Plan Strategic Environmental Appraisal Review – Revised Deposit Stage (February 2001).                |
| CD10   | Waste Local Plan Statement of Public Participation and Consultation (August, 2000)                                |
| CD11   | <b>Preparation of Pre Deposit Consultation WLP</b>  |
| CD11/1 | 30 <sup>th</sup> March 1998 WLP Policy Panel  |
| CD11/2 | 16 <sup>th</sup> July 1998 WLP Policy Panel   |
| CD11/3 | 2 <sup>nd</sup> November 1998 WLP Policy Panel  |
| CD11/4 | 25 <sup>th</sup> February 1999 WLP Policy Panel   |
| CD11/5 | 1 <sup>st</sup> April 1999 - WLP Site Inspection  |
| CD11/6 | 7 <sup>th</sup> April 1999 – WLP Policy Panel   |
| CD11/7 | 23 <sup>rd</sup> June 1999 – Environment Committee  |
| CD12   | <b>Preparation of Deposit Draft WLP</b>   |
| CD12/1 | 8 <sup>th</sup> May 2000 WLP Policy Panel   |
| CD12/2 | 20 <sup>th</sup> July 2000 Environment Committee  |
| CD13   | <b>Preparation of Revised Deposit Draft WLP</b>   |
| CD13/1 | 20 <sup>th</sup> November 2000 WLP Policy Panel   |
| CD13/2 | 8 <sup>th</sup> January 2001 WLP Policy Panel   |
| CD13/3 | 17 <sup>th</sup> January 2001 Environment Committee   |
| CD13/4 | 7 <sup>th</sup> March 2001 Environment Committee  |
| CD14   | Gloucestershire County Council Waste Management Strategy (June, 1997)   |
| CD15   | Gloucestershire Minerals Local Plan, Revised Deposit (April, 2000)  |

|                 |  |
|-----------------|--|
| CD16            | Gloucestershire Biodiversity Action Plan ( March 2000)   |
| CD17            | Gloucestershire Local Transport Plan (July 2000)   |
| CD18            | Skeleton Report produced on computer disc for the inquiry inspector, plus sample print-out of Chapters 3 & 4 (September, 2001)                             |
| <b>CD20-30</b>  | <b>Local Plans</b>   |
| CD20            | Cheltenham Borough Council Local Plan (Adopted December, 1997)   |
| CD21            | Cotswold District Council Local Plan– District-Wide Policies and Proposals, North Cotswolds Section and Thames Valley Section (Adopted August, 1999)       |
| CD22            | Gloucester City Council Deposit Draft Local Plan (June, 2001)  |
| CD23            | Forest of Dean Local Plan (Adopted December 1996)  |
| CD24            | Forest of Dean First Deposit Local Plan Review (July, 2000)  |
| CD25            | Stroud District Council Revised Deposit Local Plan (June, 2001 )   |
| CD26            | Tewkesbury Borough Council Revised Deposit Local Plan (January, 2001)  |
| CD27            | Wiltshire & Swindon Waste Local Plan (2011)  |
| CD28            | Gloucester City Council Local Plan Interim Adoption Copy (October, 1996)   |
| <b>CD31-100</b> | <b>Planning Policy Guidance Notes</b>  |
| CD31            | Minerals Policy Guidance Note 6 “Guidelines for Aggregate Provision in England” (April, 1994)  |
| CD32            | Minerals Planning Guidance Note 7 “The Reclamation of Mineral Workings (November 1996)   |
| CD33            | Minerals Planning Guidance Note 11 “Controlling and Mitigating the Environmental Effects of Minerals Extraction in England”. Consultation Paper (May 2000) |
| CD33a           | Minerals Planning Guidance Note 11 “The Control of Noise at Surface Mineral Working” (April 1993)  |
| CD34            | Planning Policy Guidance Note 1 “General Policy and Principles” (1997)   |
| CD35            | Planning Policy Guidance Note 2 “Green Belts” (March, 1999)  |
| CD36            | Planning Policy Guidance Note 7 “The Countryside – Environmental Quality and Economic and Social Development” (February, 1997)                             |
| CD37            | Planning Policy Guidance Note 9 “Nature Conservation” (October, 1994)  |
| CD38            | Planning Policy Guidance Note 10 “Planning and Waste Management” (1999)  |

- CD39      Planning Policy Guidance Note 11 “Regional Planning”  
Public Consultation Draft (February 1999)
- CD40      Planning Policy Guidance Note 12 “Development Plans” (December, 1999)
- CD41      Planning Policy Guidance Note 13 “Transport” (March 2001)
- CD42      Planning Policy Guidance Note 15 “Planning and the Historic Environment”  
(September, 1994)
- CD43      Planning Policy Guidance Note 16 “Archaeology and Planning” (November, 1990)
- CD44      Planning Policy Guidance Note 22 “Renewable Energy” (February 1993)
- CD45      Planning Policy Guidance Note 23 “Planning and Pollution Control” (1994)
- CD46      Planning Policy Guidance Note 24 “Planning and Noise” (September, 1994)
- CD47      Planning Policy Guidance Note 25 “Development and Flood Risk” (July, 2001)
- CD48      Planning Policy Guidance Note 3 “Housing” (March 2000)

#### **Regional Policy Guidance**

- ~~CD60a      Regional Planning Guidance Note 10 for the South West (Draft RPG Proposed  
Changes Dec, 2000): Parts 1 and 2 (superseded)~~
- CD60b      Regional Planning Guidance Note 10 for the South West (September 2001)
- ~~CD61      Draft Regional Planning Guidance for the South West (1999 – superseded)~~

#### **CD101-200 Other relevant policy and guidance**

- CD101      Environment Agency – Strategic Waste Management Assessment: South West (2000)
- CD102      ‘Waste Strategy 2000’ - DETR (May, 2000): Parts 1 and 2
- CD103      Guidance on Policies for Waste Management, DETR (Consultation Draft, April 2001)
- CD104      DETR Research: Planning for Sustainable Waste Management (April, 2001)
- CD105      Guidance on Municipal Waste Management Strategies (March, 2001)
- CD106      This Common Inheritance - DoE (1990)
- CD107      DoE ‘Making Waste Work: A Strategy for Sustainable Waste Management in England  
& Wales (1995)
- CD108      Town and Country Planning (General Permitted Development) Order (1995)
- CD109      “Policy and Practice for the Protection of Floodplains” - Environment Agency (1997)

|       |  |
|-------|--|
| CD110 | Biodiversity, The UK Action Plan – DoE (1994)  |
| CD111 | DoE Circular 1/97 ‘Planning Obligations’   |
| CD112 | DoE Circular 2/85 ‘Planning Controls over Oil and Gas Operations’  |
| CD113 | DoE Circular 30/92 ‘Development and Flood Risk’  |
| CD114 | Environmental Impact Assessment Circular 02/99 - DETR (March, 1999)  |
| CD115 | DoE Circular 10/97 ‘Enforcement’   |
| CD116 | DoE Circular 17/89 ‘Landfill Sites’  |
| CD117 | DoE Circular 11/94 ‘ Environmental Protection Act 1990: part II Waste Management Licensing – The Framework Directive on Waste.   |
| CD118 | Policy & Practices for the Protection of Groundwater Regional Appendix Thames Region" published 1997 Environment Agency.   |
| CD119 | “Agenda 21” UN Conference on Environment and Development (1992)  |
| CD120 | Town & Country Planning (Environmental Impact Assessment) Regulations (1999)   |
| CD121 | Environmental Appraisal of Development Plans: A Good Practice Guide DoE (1993)   |
| CD122 | ‘Conservation Issues in Local Plans’ - Countryside Commission, English Heritage, English Nature (1996)   |
| CD123 | Inspectors Report into objections to the South Gloucestershire Minerals and Waste Local Plan (July 2001)   |
| CD124 | Inspectors Report into the Essex & Southend Waste Local Plan (2000)  |
| CD125 | Ministerial Statement on AONBS - House of Commons (13 <sup>th</sup> June, 1998)  |
| CD126 | Minerals and Waste Policies in Development Plans: Use of Buffer Zones Report of Survey Results (June, 1996)  |
| CD127 | Waterways for Tomorrow (DETR: June 2000)   |
| CD128 | White Paper: A New Deal for Transport; Better for Everyone (July 1998)   |
| CD129 | Environment Agency - Report for Gloucestershire County Council: The types and quantities of waste accepted by licensed Waste Management Facilities within Gloucestershire during the period of 1995-2000 (June 2000) |
| CD130 | Environment Agency - Addendum to the Report for Gloucestershire County Council April 2000-March 2001 (October 2001)  |
| CD131 | Municipal Waste Strategy for Gloucestershire 2002-2032 SECOND DRAFT  |



- CD132      'Municipal Solid Waste Incineration: health effects, regulation and public communication' report to the National Society for Clean Air and Environmental Protection by the Institute for European Environmental Policy (May 2001)
- CD133      Inspector's decision on an appeal by B & H Properties Ltd concerning Land at Ringtail Court, Burscough Industrial Estate, Burscough, Lancs (27 September, 2001)
- CD134      Council Directive 1999/31/EC (Landfill) (26 April, 1999)
- CD135      Incineration and Human Health (Greenpeace)
- CD136      Gloucestershire County Council Waste Management 2002, Progress Report (Entec UK Ltd, May 2000)
- CD137      WPA Report to Waste Local Plan Inquiry Arising from Informal Session: Current situation in respect of composting. Environment Agency Situation Report and Consultation - October 2001 (November, 2001)
- CD138      How to comply with the landfill directive targets without incineration: a Greenpeace blueprint (Greenpeace, October 2001)
- CD139      Municipal Solid Waste Incineration: Observations on the IEEP Report for the National Society For Clean Air (Greenpeace Research Laboratories, July 2001)
- CD140      Extracts from 'Materials Recovery Facilities' (Institute of Wastes Management, December 2000)
- CD201-220    Documents produced by the Inspector**
- CD201(rev)    Round Table Session on Waste Data – Outcome (6 Nov, 2001)
- CD202      Round Table Session on Waste Management Methods – Outcome (8 Nov, 2001)
- CD 203      Waste Seminar Report – SELCHP/COMPOST (September, 2001)



## Waste Planning Authority (WPA) Submissions For The Public Local Inquiry into the Gloucestershire Waste Local Plan

### Topic Proofs

| Doc Ref | Topic   | Distribution   |
|---------|---|--|
| WPA 1   | Data Verification                             | Participants in Round Table Session on Data                        |
| WPA 1a  | Supporting Data to WPA 1                      | Participants in Round Table Session on Data                        |
| WPA 1b  | Data Verification: December update            | Participants in Round Table Session on Data                        |
| WPA 2   | Issues of Need &<br>Regional Self-Sufficiency | All objectors appearing at inquiry                                 |
| WPA 3   | Policy 35 – Waste Minimisation                | All objectors appearing at inquiry                                 |
| WPA 4   | Waste Technology                              | Participants in Round Table Session on<br>Waste Management Methods |
| WPA 5   | Site Selection                                | All objectors appearing at inquiry                                 |
| WPA 6   | Not used                                      |  |

### Main Proofs

| Doc Ref   | Objector/s  | Objection Ref No/s  |
|---|---|---|
| WPA 7a<br>(re general<br>objs on Waste<br>Management)           | Friends of the Earth (FoD)<br>Friends of the Earth (Glos)<br>Hempsted Residents Association                   | 61768/5D<br>88713/3, /76D<br>62613/2, /3, /18, /19, /29, /32,<br>/40, /41, /43, /44, /45, /49, /50D |
| WPA 7b<br>(as WPA 7a)   | The Environment Agency<br>Friends of the Earth (Glos)   | 62569/4D<br>88713/4D  |
| WPA 7c<br>(as WPA 7a)   | Friends of the Earth (Glos)   | 88713/6D  |
| WPA 8<br>(re objs to<br>Chap 2)                                 | The Environment Agency<br>Friends of the Earth (Glos)<br>Vision 21  | 62569/13D<br>88713/11-14, /17D<br>63039/1D  |
| WPA 9<br>(re objs to<br>Chap 3)                                 | The Environment Agency<br>Friends of the Earth (FoD)<br>Friends of the Earth (Glos)<br>S Grundon (Ewelme) Ltd | 62569/1, /14D<br>61768/6D<br>88713/18-20D<br>60509/1-3D, /1RD                                       |
| WPA 10<br>(re objs to<br>Chap 4, non-<br>site specific<br>objs) | Friends of the Earth (Glos)<br>S Grundon (Ewelme) Ltd<br>Hempsted Residents Association<br>Vision 21          | 88713/22, /23D<br>60509/7D, /2RD<br>62613/27, /31D<br>63039/2D                                      |
| WPA 11<br>(re objs to<br>Sites 1, 2,<br>RD18)                   | Robert Hitchins Ltd<br>Stoke Orchard Parish Council   | 89808/17, /18D, /4, /1, /2RD<br>61865/1, /2D  |

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|---|
| <b>Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report</b> |
|---|

plus

WPA 11a

Highways Evidence on Site 1

WPA11b

Accident Report on Stoke Orchard Rd, 1 Jan 1996 to 30 Sep 2001

| <b>Doc Ref</b>   | <b>Objector/s</b>   | <b>Objection Ref No/s</b>   |
|--|---|---|
| WPA 12<br>(re objs to<br>Site 3/RD3,<br>Policies 4, 5,<br>Schedule 2)<br>plus<br>WPA 12a: Guidance on Policies for Waste Management Planning, prepared for the DETR by<br>Land Use Consultants (April 2001)<br>WPA 12b: Inspector's Covering Letter to Chief Executive, from the Statement of Decisions on the<br>Inspector's Recommendations, North Somerset Waste Local Plan | Bovis Homes Ltd<br>Westbury Homes Ltd<br>Arlington Property Devts Ltd<br>Tewkesbury Borough Council | 88537/1,/2D,3-5RD<br>88538/1,/2D,3-5RD<br>87715/1,/2D,3-5RD<br>62044/1D,/1,/2RD |
| WPA 13<br>(re objs to<br>Sites 4, 14)<br>plus<br>WPA 13a: Consideration Arising from Inquiry Session on Site RD4 – Sudmeadow<br>WPA 13b: GCC Network Improvement Unit memo re proposed Gloucester South West Bypass  | Friends of the Earth (Forest of Dean)<br>Hempsted Residents Association                             | 61768/7D<br>62613/28,/33,/51,/17D   |
| WPA 14<br>(re obj to<br>Site 5)  | David Drew MP   | 61652/1D  |
| WPA 15<br>(re objs to<br>Site 6/RD23,<br>RD Schedules<br>1, 2,<br>Policies 4, 5)<br>plus<br>WPA 15a &<br>maps15a/1-3: Sharpness Ecology Issues   | Cory Environmental Ltd<br>British Waterways<br>David Drew MP<br>Friends of the Earth (Glos)         | 62637/5-7,/9,/11-13RD<br>61998/3-5,/7-9RD<br>61652/2D<br>88713/26D              |
| WPA 16<br>(re objs to<br>Site RD7)   | Cotswold District Council<br>NMB Group plc<br>Porsche Club Great Britain                            | 62042/3D<br>89826/1-4D<br>89814/1-4D  |
| WPA 17<br>(re objs to<br>Site 9)   | Tewkesbury Borough Council  | 62044/3D  |
| WPA 18   | Number not used   |   |
| WPA 19<br>(re objs to<br>Site RD15)  | Forest of Dean District Council<br>Friends of the Earth (Forest of Dean)                            | 62040/7D,/2RD<br>61768/1D   |
| WPA 20<br>(re objs to<br>Sites RD16,<br>RD17 (A & B)   | Forest of Dean District Council<br>Friends of the Earth (Forest of Dean)<br>Robert Hitchins Ltd     | 62040/3,/6,/8/D,/3,/4RD<br>61768/3,/4D<br>69808/5-8D,/3RD                       |

|  |
|--|
| Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report |
|--|

WPA 21, 22                      Numbers not used

| Doc Ref | Objector/s | Objection Ref No/s |
|---------|------------|--------------------|
|---------|------------|--------------------|

|                                   |   |                         |
|-----------------------------------|---|-------------------------|
| WPA 23,<br>(re objs to<br>Site 8) | Robert Hitchins Ltd<br>Tewkesbury Borough Council | 89808/9-11D<br>62044/2D |
|-----------------------------------|---|-------------------------|

plus

WPA 23a: Highways Evidence on Site 8

WPA 23b: Accident Report on A4019 'Old Spot Junction', 1 Jan 1996 to 30 Sep 2001

|   |   |                                 |
|---|---|---------------------------------|
| WPA 24<br>(re objs to<br>Policies 4, 5) | Hempsted Residents Association<br>Lydney Land Resources | 62613/4,/8,/9D<br>65984/3D,/2RD |
|---|---|---------------------------------|

|  |   |                         |
|--|---|-------------------------|
| WPA 25<br>(re objs to<br>Policies 1 to<br>3 inclusive) | Friends of the Earth (Forest of Dean)<br>Hempsted Residents Association | 61768/8,/9D<br>62613/4D |
|--|---|-------------------------|

|   |                                 |             |
|---|---------------------------------|-------------|
| WPA 26<br>(re objs to<br>Policies 6, 7) | Forest of Dean District Council | 62040/4,/5D |
|---|---------------------------------|-------------|

|  |                             |           |
|--|-----------------------------|-----------|
| WPA 27<br>(re objs to<br>Policies 14-21) | Friends of the Earth (Glos) | 88713/43D |
|--|-----------------------------|-----------|

WPA 28                      Number not used

|  |                             |                      |
|--|-----------------------------|----------------------|
| WPA 29<br>(re objs to<br>para 5.118,<br>Policy 35, para 5.127) | Friends of the Earth (Glos) | 88713/62D,/20RD,/67D |
|--|-----------------------------|----------------------|

#### Miscellaneous WPA Documents

|        |  |
|--------|--|
| WPA 31 | Proposed Changes to the Gloucestershire Waste Local Plan Following Consideration of Representations to the Revised Deposit Draft Version |
|--------|--|

|         |  |
|---------|--|
| WPA 31a | Proposed Further Changes to the Gloucestershire Waste Local Plan Following Inquiry Sessions and Consideration of Objectors' Further Written Evidence |
|---------|--|

|        |  |
|--------|--|
| WPA 32 | Opening Address to Gloucestershire County Council's Revised Deposit Waste Local Plan Inquiry by Cllr Dr John Cordwell as relevant Cabinet Member |
|--------|--|

|         |   |
|---------|---|
| WPA 32a | The County Council's Closing Submission to the Waste Local Plan Inquiry |
|---------|---|

|        |   |
|--------|---|
| WPA 33 | Memorandum of Understanding between Glos County Council, Cheltenham Borough Council, Cotswold District Council, Forest of Dean District Council, Gloucester City Council, Stroud District Council and Tewkesbury Borough Council (16 February, 2001) - distributed to all participants in both Round Table Sessions |
|--------|---|

|        |   |
|--------|---|
| WPA 34 | Issue of 'Need' arising from Round Table Session 1 (Waste Data) of the RDGWLP Inquiry on 6 November 2001 - distributed to all participants in both Round Table Sessions |
|--------|---|

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| <b>Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report</b> |
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|        |  |
|--------|--|
| WPA 35 | Not used   |
| WPA 36 | Matters Arising from Round Table Session 2 (Waste Management Methods) of the RDGLWP Inquiry on 8 November 2001 – distributed to all participants in both Round Table Sessions: 'Best Practicable Environmental Option (BPEO) within the context of the RDGWLP' |
| WPA 37 | Copy of e-mail message from WPA to Programme Officer re queries from inspector, (3 Jan, 2002)  |
| WPA 38 | Letter from WPA to Mr Mews re RD28 (17 Dec, 2001)  |

### **Rebuttal Proofs to Individual Objectors**

| <b>Doc Ref</b>  | <b>Objector</b>                       | <b>Objection Ref No/s</b>                                   |
|---|---------------------------------------|---|
| WPA 101<br>& 101a<br>(re obj to Site 4)   | Friends of the Earth (Forest of Dean) | 61768/7D  |
| WPA 101b<br>(re objs to<br>Sites 4,15,16,17, RD15)  | Friends of the Earth (Forest of Dean) | 61768/7,/1,/3,/4D &<br>objection to pre-inquiry change      |
| WPA 101c<br>(as 101b, plus<br>Chap 5, para 5.7)   | Friends of the Earth (Forest of Dean) | as 101b, plus 61768/8,/9D                                   |
| WPA 102   | Number not used                       |   |
| WPA 103<br>(re Gen objs,<br>objs to paras 1.4, 2.11, Chap 5,<br>Policies 4, 5, 37, Sites 14, 4)                 | Hempsted Residents Association        | 62613/2-4,/8,/9,/16,/17,<br>/28,/33,/51D                    |
| WPA 104   | Number not used                       |   |
| WPA 105<br>(re General<br>obj, objs to Chap 2, Policy 26)   | Vision 21                             | 63039/1,/3,/4D  |
| WPA 105a<br>(re Policy 26)  | Vision 21                             | 63039/4D  |
| WPA 106   | Number not used                       |   |
| WPA 107<br>(re objs to<br>Sites 1, 2, RD18, RD Schedule 1, Site 8,<br>Schedule 2, Policy 5, Sites 16, 17, RD17) | Robert Hitchins Ltd                   | 89808/17,/18,D/4,/1,/2RD,<br>/9,/10, /11,/6,/7D,/3RD,/8,/5D |
| WPA 108<br>(re objs to<br>Sites 1, 2)   | Stoke Orchard Parish Council          | 61865/1,/2D   |
| WPA 109   | Number not used                       |   |

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| <b>Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report</b> |
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| <b>Doc Ref</b>  | <b>Objector</b>                               | <b>Objection Ref No/s</b>                             |
|---|---|---|
| WPA 110<br>(re objs to<br>Site 3/RD3,<br>Policies 4, 5,<br>RD Schedule 2)                                   | Bovis Homes Ltd                               | 88537/1,/2D,/3-5RD                                    |
| WPA 111<br>(as WPA 110)   | Westbury Homes Ltd                            | 88538/1,/2D,/3-5RD                                    |
| WPA 112<br>(re objs to<br>Site 3/RD3,<br>Policy 5, Sites 8, 9)  | Tewkesbury Borough Council                    | 62044/1D,/1,/2RD,/2,/3D                               |
| WPA 113<br>(re objs to<br>Sites 5, 6)   | David Drew MP                                 | 61652/1,/2D   |
| WPA 114<br>(re objs to<br>Site 6/RD23,<br>RD Schedules 1, 2,<br>Policies 4 & 5)                             | Cory Environmental Ltd &<br>British Waterways | 62637/5-7,/9,/11-13RD<br>61998/3-5,/7-9RD             |
| WPA 115<br>(re objs to<br>Site 6/RD23,<br>RD Schedule 1, Policies 4, 5)                                     | British Waterways                             | 61998/4,5,/7,/3,/8,/9RD                               |
| WPA 116   | Number not used                               |   |
| WPA 117<br>(re objs to<br>Sites 16/RD16,<br>17/RD17, Schedule 2, Policy 5,<br>Sites 15/RD15, Policies 6, 7) | Forest of Dean District Council               | 62040/8D,/3RD,/9D,/4RD,/6D,<br>/1RD,3,/7D,/2RD,/4,/5D |
| WPA 118<br>(re obj to<br>Site 7)  | Cotswold District Council                     | 62042/3D  |
| WPA 119<br>(re objs to<br>Site 7, Chap 4, Policy 7)   | NMB Group plc                                 | 89826/1,/2,/4,/3D                                     |
| WPA 120<br>(re objs to<br>Site 7, Policy 7)   | Porsche Club Great Britain                    | 89814/1,/2,/4,/3D                                     |
| WPA 121<br>(re objs to<br>Site 3, Policy 4, Site RD3,<br>Policy 5, RD Schedule 2)                           | Arlington Property Devts Ltd                  | 87715/1,/2D,/3-5RD                                    |

**Responses to Individual Objectors' Further Written Representations**

| <b>Doc Ref</b>   | <b>Objector</b>                    | <b>Objection Ref Nos</b>                                    |
|--|------------------------------------|---|
| WPA 200<br>(re general<br>objs, objs<br>to 2.13, Chap 4)   | Hon J A Billings-Ferrand           | 88891/1-6D  |
| WPA 201<br>(re obj to<br>Policy 6)   | South Gloucestershire Council      | 62048/1D  |
| WPA 202<br>(re objs to<br>Chap 4, Policy 33)   | Environment Agency                 | 62569/18, /27D  |
| WPA 203<br>(re objs to<br>Sites 4, 10, 11,<br>14, Policies 4, 5, 6, 7<br>Sites RD4, RD21)                        | Gloucester City Council            | 62043/8,/9,/11,/12,/15,/18,/20,<br>/21,/22D,/5,/9,/10,/13RD |
| WPA 204<br>(re objs to Site RD22)  | Frampton on Severn Parish Council  | 61871/1RD   |
| WPA 205<br>(re obj to Site 17)   | Mr David Holmes                    | 87713/1D  |
| WPA 206<br>(re objs to Policies RD25, 13)  | Cheltenham Borough Council         | 62046/1, /2RD   |
| WPA 207<br>(re obj to Site 6, General obj)   | Mr & Mrs Funnell                   | 66841/1, 2D   |
| WPA 208<br>(re obj to Site RD17)   | Lydney Land Resources              | 65984/3RD   |
| WPA 209<br>(re obj to RD Schedule 2)   | Stroud District Council            | 62041/4RD   |
| WPA 210<br>(re objs to Chap 3,<br>Policies 2 & 4, Para 5.72)   | Environmental Services Association | 62542/9, /8, /7, /4D  |
| WPA 211<br>(re objs to<br>Para 2.27, Figure 2.1,<br>para 4.5, Chap 4, Table 5.1,<br>para 5.117, Policies 24, 26) | Friends of the Earth (Glos)        | 88713/8,/15,/24,/25,/28,/61D,<br>/17, /18RD                 |
| WPA 212<br>(re objs to Site RD3, Policy 5)   | Badgeworth Parish Council          | 61849/1, /2RD   |



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| <b>Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report</b> |
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| <b>Doc Ref</b>   | <b>Objector</b>                        | <b>Objection Ref Nos</b> |
|--|--|--------------------------|
| WPA 213<br>(re obj to Site 3)  | Mr & Mrs Clewes                        | 88189/1D                 |
| WPA 214<br>(re objs to<br>Sites RD17, 5, 9,<br>Policies 4, 5, Chap 6)  | Highways Agency                        | 62012/1RD/4-8D           |
| WPA 215<br>(re objs to Policies 4, 5)  | Swindon Borough Council                | 62043/4,/5RD             |
| WPA 216<br>(re obj to Chap 4, General obj)   | National Council of Women (Cheltenham) | 89727/2, /3D             |
| WPA 217<br>(re omission<br>site – Wilderness Quarry)   | Mr G M Read                            | 88535/1D                 |
| WPA 218  | Number not used                        |                          |
| WPA 219<br>(re obj to<br>Chap 4, general objs)   | Mr Brian Furniss                       | 62680/1-5D               |
| WPA 220<br>(re obj to Chap 2)  | Westbury on Severn Parish Council      | 61897/1D                 |
| WPA 221<br>(re objs to<br>Site 11, Policy 4)   | Allstone Sand & Gravels                | 88663/1, /2D             |
| WPA 222<br>(re objs to<br>paras 3.15, 3.16,<br>3.21, 3.22, 4.5, RD Schedule 2,<br>Sites 3, 6, RD17, Policies 4, 5,<br>Sites RD3, RD23, Policies 7, 15) | Federal Mogul Camshafts                | 887972-16, /19, /20RD    |
| WPA 223  | Number not used                        |                          |
| WPA 224<br>(re objs to<br>Site 9, Policy 5)  | Messier-Dowty Ltd                      | 88642/1RD,/1, /2D        |
| WPA 225<br>(re objs to<br>Site 9, Policy 5)  | Dowty Group plc                        | 89843/1, /2D, /1RD       |
| WPA 226<br>(re obj to Site 9)  | Tewkesbury Borough Council             | 62044/3D                 |

| Doc Ref   | Objector  | Objection Ref No/s   |
|---|---|--|
| WPA 227<br>(re obj to Site 6)   | Mr J W Gillett  | 90066/1D   |
| WPA 228<br>(re objs to<br>Chap 4 –<br>Site 6,<br>General,<br>RD23, RD Schedule 2) | Mr B J Price<br>Mrs A Price<br>Miss H Price<br>Master M Price | 88638/1, /2D, /1, /2RD<br>88641/1D, /1, /2RD<br>88639/1D, /1, /2RD<br>88640/1D, /1, /2RD |
| WPA 229<br>(re obj to Site RD23)  | Mrs C Simpson   | 98701/1RD  |

**WPA responses to Objectors' Documents submitted after 30 November**

| Doc Ref  | Objector                    | Objection Ref No/s                                     |
|--|-----------------------------|--|
| WPA 300<br>(re Post<br>Inquiry Submission on<br>WPA 31, BPEO, Site 2)    | S Grundon (Ewelme) Ltd      | obj to WPA 31 (para 5.57),<br>60509/9, /8D             |
| WPA 301<br>(re objs to<br>Site 9, Policy 5)                              | Dowty Group plc             | 89843/1, /2D, /1RD                                     |
| WPA 302<br>(re final written<br>submission from<br>FOE (Glos) – FEG/W/3) | Friends of the Earth (Glos) | On 'Matters arising since the<br>Round Table Sessions' |

## DOCUMENTS SUBMITTED BY OBJECTORS FOLLOWING DEPOSIT AND REVISED DEPOSIT PERIODS

### ALLSTONE SAND & GRAVELS (88663) (ASG)

|   |                    |                   |
|---|--------------------|-------------------|
| <b>Written Representations:</b>                         | <b>Objections:</b> | <b>Plan Refs:</b> |
| ASG/W/1, ASG/W/1.1 & ASG/W/1.2 submitted by P Duncliffe | 88663/1D           | Site 11           |
| or P E Duncliffe  | 8866//2D           | Policy 4          |

### ARLINGTON PROPERTY DEVELOPMENTS LTD (87715) (APD)

|   |   |                    |                   |
|---|---|--------------------|-------------------|
| <b>Round Table Submission:</b>  | APD/RTS/1 (Waste Management Methods),<br>submitted by T Hancock of Terence O'Rourke plc |                    |                   |
| <b>Inquiry Proofs:</b>  |   | <b>Objections:</b> | <b>Plan Refs:</b> |
| APD/P/1, submitted by T Hancock   |   | 87715/1D           | Site 3            |
|   |   | 87715/2D           | Policy 4          |
|   |   | 87715/3RD          | RD Schedule 2     |
|   |   | 87715/4RD          | Policy 5          |
|   |   | 87715/5RD          | Site RD3          |
| APD/P/2, APD/P/2.1 (summary), submitted by D J Sandbrook<br>of Voaden Sandbrook Ltd   | as above  |                    |                   |
| APD/P/3, submitted by J Donald of Strutt & Parker   | as above  |                    |                   |
| APD/DOC/1, submitted by J Donald (appendices to APD/P/3)  |   |                    |                   |
| APD/DOC/2, submitted by advocate, David Cooper of Gouldens Solicitors: letter, plus attachments, from Gouldens<br>to Tewkesbury Borough Council, 'Gloucester Business Park –<br>Variation of Section 106 Agreement' (21 November, 2001) |   |                    |                   |
| APD/DOC/3, submitted by T Hancock: 'A White Paper on Enterprise Skills and Innovation' (GOSW)   |   |                    |                   |
| APD/DOC/4, submitted by T Hancock: 'Strategic Sites Study' (SWRDA) for<br>EIP into Draft RPG for the South West (March, 2000)   |   |                    |                   |
| APD/DOC/5, submitted by D J Sandbrook: extract from article on<br>Glos Waste Local Plan (Gloucestershire Echo, 22 November, 2001)   |   |                    |                   |
| APD/DOC/6, submitted by T Hancock: suggested rewording of Policy 6, RDGWLP  |   |                    |                   |
| APD/DOC/7, submitted by T Hancock: extract from inspector's report on objections<br>to Hertfordshire Waste Local Plan Deposit Draft (August 1997)   |   |                    |                   |

|   |                   |                  |
|---|-------------------|------------------|
| <b>Written Representation:</b>  | <b>Objection:</b> | <b>Plan Ref:</b> |
| APD/W/1, submitted by J Jardine of Terence O'Rourke plc:<br>Response to WPA 31a | 87715/1D          | Site 3           |

### BADGEWORTH PARISH COUNCIL (61849) (BPC)

|                                       |                    |                   |
|---------------------------------------|--------------------|-------------------|
| <b>Written Representation:</b>        | <b>Objections:</b> | <b>Plan Refs:</b> |
| BPC/W/1, submitted by H Jones (clerk) | 61849/1RD          | Site RD3          |
|                                       | 61849/2RD          | Policy 5          |

### BILLINGS-FERRAND J A (88891) (JBF)

|  |                    |                   |
|--|--------------------|-------------------|
| <b>Written Representation:</b>             | <b>Objections:</b> | <b>Plan Refs:</b> |
| JBF/W/1, submitted by J A Billings-Ferrand | 88891/1,2D         | General           |
|  | 88891/3D           | Para 2.13         |
|  | 88891/4-6D         | Chapter 4         |

### BOVIS HOMES LTD (88537) & WESTBURY HOMES LTD (88538) – JOINT CASE (BWY)

|   |                    |                   |
|---|--------------------|-------------------|
| <b>Inquiry Proofs:</b>  | <b>Objections:</b> | <b>Plan Refs:</b> |
| BWY/P/1, plus BWY/DOC/1 (Enclosures) &<br>BWY/DOC/2 (summary proof & background information), | 88537/1,88538/1D   | Site 3            |
|   | 88537/5,88538/5RD  | Site RD3          |

|  |                   |               |
|--|-------------------|---------------|
| submitted by J Standen of Barton Willmore Planning Partnership | 88537/4,88538/4RD | RD Schedule 2 |
|  | 88537/2,88538/2D  | Policy 4      |
|  | 88537/3,88538/3RD | Policy 5      |

**CHELTENHAM BOROUGH COUNCIL (62046) (CBC)**

|   |                    |                   |
|---|--------------------|-------------------|
| <b>Written Representations:</b>                 | <b>Objections:</b> | <b>Plan Refs:</b> |
| CBC/W/1, submitted by R Wills of Cheltenham B C | 62046/1RD          | Policy 25         |
| CBC/W/2, submitted by R Wills                   | 62046/2RD          | Policy 13         |

**CORY ENVIRONMENTAL LTD (62637) (CRY)**

**Round Table Submissions:** CRY/RTS/1 & CRY/RTS/1.1 (Waste Data) and CRY/RTS/2 (Waste Management Methods), submitted by A Judge of Cory Environmental Ltd

**CORY ENVIRONMENTAL LTD (62637) & BRITISH WATERWAYS (61998) – JOINT CASE (CRY/BWW)**

|  |                    |                   |
|--|--------------------|-------------------|
| <b>Inquiry Proofs:</b>   | <b>Objections:</b> | <b>Plan Refs:</b> |
| CRY/BWW/P/1, submitted by A Dugdale of Cory Environmental Ltd, including appendices /DOC/1-/DOC/16 | 62637/6,61998/4RD  | Site 6            |
|  | 62637/9,/11RD      | Site RD23         |
|  | 61998/5,/7RD       | Site RD23         |
|  | 62637/5,61998/3RD  | RD Schedule 1     |
|  | 62637/7RD          | RD Schedule 2     |
|  | 62637/12,61998/8RD | Policy 4          |
|  | 62637/13,61998/9RD | Policy 5          |

Summary of Proof CRY/BWW/P/1

CRY/BWW/P/1.1, submitted by A Dugdale: 'Use of Inland Waterways vs Road Transport'

CRY/BWW/DOC/16.1: submission including notice published in the London Gazette re designation of Sharpness Old Docks as Conservation Area

CRY/BWW/DOC/17: letter from Railtrack, aerial photograph and map (22 October, 2001)

CRY/BWW/DOC/18: inspector's decision on appeal by Hampshire Waste Services Ltd on Portsmouth Incinerator (15 October, 2001)

**Written Representation:**

CRY/W/1, submitted by A Dugdale: Response (re Site 4) to WPA 31a

**DOWTY GROUP PLC, NOW SMITHS GROUP PLC (89843) (DTY)**

|   |                    |                   |
|---|--------------------|-------------------|
| <b>Written Representations:</b>   | <b>Objections:</b> | <b>Plan Refs:</b> |
| DTY/W/1, submitted by J Standen of Barton Willmore Planning Partnership | 89843/1D           | Site 9            |
| DTY/W/2, submitted by Stuart Michael Associates                         | 89843/2D           | Policy 5          |
| DTY/W/3, DTY/W/4, DTY/W/5 submitted by J Standen                        | as above           |                   |
|   | as above           |                   |

**DAVID DREW MP (61652) (DRW)**

|                              |                    |                   |
|------------------------------|--------------------|-------------------|
| <b>Inquiry Proofs:</b>       | <b>Objections:</b> | <b>Plan Refs:</b> |
| DRW/P/1, submitted by D Drew | 61652/1D           | Site 5            |
| DRW/P/2, submitted by D Drew | 61652/2D           | Site 6            |

**ENVIRONMENT AGENCY (62569) (EAY)**

**Round Table Submission:** EAY/RTS/1 (Waste Data and Waste Management Methods), submitted by R Wade of the Environment Agency  
EAY/RTS/1.1: Landfill Directive, submitted by R Wade  
EAY/RTS/1.2: Void Space in Gloucestershire, submitted by R Wade

|                                |                    |                   |
|--------------------------------|--------------------|-------------------|
| <b>Written Representation:</b> | <b>Objections:</b> | <b>Plan Refs:</b> |
| EAY/W/1, submitted by R Wade   | 62569/18D          | Chapter 4         |
|                                | 62569/27D          | Policy 33         |

### **ENVIRONMENTAL SERVICES ASSOCIATION (62542) (ESA)**

**Written Representation:**

ESA/W/1, submitted by W Laramée of ESA

**Objections:**

62542/9D  
62542/8D  
62542/7D  
62542/4D

**Plan Refs:**

Chapter 3  
Policy 2  
Policy 4  
Para 5.72

### **FEDERAL MOGUL CAMSHAFTS (88797) (FMC)**

**Written Representations:**

FMC/W/1 & FMC/W/1.1, submitted by I Johnson  
of Pro Vision Planning & Design

**Objection:**

88797/1RD

**Plan Ref:**

Site RD17

### **FOREST OF DEAN DISTRICT COUNCIL (62040) (FDC)**

**Inquiry Proofs:**

FDC/P/1, submitted by N Gibbons of Forest of Dean D C

**Objections:**

62040/2RD  
62404/1RD  
62040/3D  
62040/3RD  
62040/4RD  
62040/3D  
62404/1RD  
62040/4D  
62040/5D

**Plan Refs:**

Site RD15  
RD Schedule 2  
Policy 5  
Site RD16  
Site RD17  
Policy 5  
RD Schedule 2  
Policy 6  
Policy 7

FDC/P/2, submitted by N Gibbons

FDC/P/3, submitted by N Gibbons

FDC/P/4, submitted by N Gibbons

### **FRAMPTON ON SEVERN PARISH COUNCIL (61871) (FPC)**

**Written Representation:**

FPC/W/1, submitted by W Alexander (chair)

**Objection:**

61871/RD

**Plan Ref:**

Site RD22

### **FRIENDS OF THE EARTH (FOREST OF DEAN) (61768) (FED)**

**Inquiry Proofs:**

FED/P/1, FED/P/1.1, FED/P/1.2, submitted by M Newton of FOE (FoD)  
FED/DOC/1: Environment Agency's monitoring of CSG (SAAG, Nov 01)  
FED/DOC/2: SWRDA News - Regeneration of Gloucester Docks (2 Nov, 01)  
FED/DOC/3: Fact sheet from Environment Agency concerning flooding 5/12/00-20/12/00  
FED/DOC/4: Environment Agency Indicative Flood-Plain Map 2000  
FED/P/2, submitted by M Newton

**Objections:**

61768/7D  
61768/8D  
61768/9D  
61768/1D

**Plan Refs:**

Site 4

FED/P/3, FED/P/3.1 & FED/P/3.2, submitted by M Newton

FED/DOC/5, appendices to FED/P/3

FED/DOC/6 – Observed Trends in the Daily Intensity of United Kingdom Precipitation (International Journal of Climatology, 8 July, 1999)

FED/P/4, submitted by M Newton

FED/P/4.1, submitted by M Newton

61768/3, /4D  
61768/1, /3, /4D

Sites 16 & 17  
Sites 15, 16 & 17

**Written Representations:**

FED/W/1, submitted by M Newton

**Objections:**

61768/7-9,  
/1, /3, /4D

**Plan Refs:**

Chap 5, para 5.7,  
Sites 4, 16, 17, 15  
& area of search F  
Sites 16, 17 & 6

FED/W/2, submitted by M Newton

61768/3, /4, /2D

### **FRIENDS OF THE EARTH (GLOS) (88713) (FEG)**

# Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report

**Round Table Submissions:** FEG/RTS/1 (Waste Data) and FEG/RTS/2 (Waste Management Methods), submitted by A Watson of Public Interest Consultants

**FRIENDS OF THE EARTH (GLOS) (88713) (FEG). continued**

FEG/RTS/2.1: Environmental Data Services Report 293 (June 1999)

FEG/RTS/2.2: Graph showing Glos Recycling & Recovery Requirements 2002-2013 with no growth in MSW arisings

FEG/RTS/2.3: Graph as 2.2 but with 1% growth in MSW arisings

FEG/RTS/2.4: The 'Relevant Objectives'

**Inquiry Proofs:**

FEG/P/1, submitted by A Watson

FEG/P/1.1, submitted by A Watson: 'The External Costs of Transportation', (Sustainable Mobility Programme, Federal Office for Scientific, Technical and Cultural Affairs, State of Belgium – January, 2001)

FEG/P/1.2, submitted by A Watson: Plans for Portsmouth Incinerator

**Objection:**

88713/26D

**Plan Ref:**

Site 6

FEG/P/1.3, submitted by A Watson: Note re inspector's decision (15 October, 2001) on Portsmouth Incinerator

FEG/P/1.4, submitted by A Watson: Closing statement on Sharpness

**Written Representations:**

FEG/W/1, submitted by F Robertson of FOE (Glos)

**Objections:**

88713/8D

88713/15D

88713/24D

88713/25D

88713/28D

88713/61D

88713/17RD

88713/18RD

**Plan Refs:**

Para 2.27

Figure 2.1

Para 4.5

GDC for Strategic Facilities

Table 5.1

Para 5.117

Policy 24

Policy 26

FEG/W/2, e-mail message from WPA: telephone message from F Robertson of FOE (Glos) re participation in Policy Panel meetings

FEG/W/3, submitted by A Watson: 'Matters Arising Since the Round Table Sessions'

FEG/W/4, letter from A Watson re supporting reference documents to be added to Inquiry Core Documents

**FUNNELL, P & C (66841) (PCF)**

**Written Representation:**

PCF/W/1, submitted by P & C Funnell

**Objections:**

66841/1D

66841/2D

**Plan Refs:**

Site 6

General

**FURNISS, B (62680) (BFN)**

**Written Representation:**

BFN/W/1 & BFN/W/1.1, submitted by B Furniss

**Objections:**

62680/1-5D

**Plan Ref:**

General

**GILLET, J W (90066) (JWG)**

**Written Representation:**

JWG/W/1, submitted by J Gillett

**Objection:**

90066/1D

**Plan Ref:**

Site 6

**GLOUCESTER CITY COUNCIL (62043) (GCY)**

**Written Representations:**

GCY/W/1, submitted by M Brentnall of Gloucester C C

**Objections:**

62043/8D

62043/11D

62043/12D

62043/15D

62043/9RD

**Plan Ref:**

General

Site 10

Site 11

Site 14

Site RD21

|                  |          |
|------------------|----------|
| 62043/18D, /10RD | Policy 4 |
| 62043/20D        | Policy 5 |
| 62043/21D        | Policy 6 |

**GLOUCESTER CITY COUNCIL (62043) (GCY) cont**

|  |                  |               |
|--|------------------|---------------|
| GCY/W/2, submitted by M Brentnall  | 62043/22D, /13RD | Policy 7      |
| GCY/W/3, submitted by M Brentnall: supplementary evidence with respect to GWLPI in the light of GCC's Topic Proof WPA 5 (Site Selection) | 62043/9, /5RD    | Sites 4 & RD4 |
| GCY/W/4, submitted by M Brentnall  | 62043/9, /5RD    | Sites 4 & RD4 |
| GCY/W/5, submitted by M Brentnall: written response to WPA203 & comments on WPA13  |                  |               |

**GRUNDON (WASTE) LTD (60509) (GDN)**

**Round Table Submissions:** GDN/RTS/1 (Waste Data) and GDN/RTS/2 (Waste Management Methods), submitted by P Wormald of S Grundon (Ewelme) Ltd

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|---|---|--|
| <b>Written Representation:</b><br>GDN/W/1, submitted by P Wormald | <b>Objections:</b><br>to WPA 31<br>60509/9D<br>60509/8D | <b>Plan Refs:</b><br>Para 5.57<br>Policy 1<br>Site 2 |
|---|---|--|

**HEMPSTED RESIDENTS ASSOCIATION (62613) (HRA)**

**Round Table Submission (Waste Management Methods) and Inquiry Proof:**

HRA/P/1, submitted by J Newell of Hempsted R A

|  |   |
|--|---|
| <b>Objections:</b><br>62613/2D<br>62613/3D<br>62613/4D<br>62613/8D<br>62613/9D<br>62613/16D<br>62613/28D | <b>Plan Refs:</b><br>Para 1.4<br>Para 2.11<br>Chap 5 and App 4<br>Policy 4<br>Policy 5<br>Policy 37<br>Site 4 |
|--|---|

**HIGHWAYS AGENCY (62012) (HWA)**

**Round Table Submissions:** HWA/RTS/1 & HWA/RTS/1.1 (Waste Management Methods), submitted by P Johnson of Colin Buchanan and Partners

|   |   |   |
|---|---|---|
| <b>Written Representations:</b><br>HWA/W/1, submitted by P Johnson<br>HWA/W/2, submitted by P Johnson | <b>Objections:</b><br>62012/1RD<br>62012/4D<br>62012/5D<br>62012/6D<br>62012/7D<br>62012/8D | <b>Plan Refs:</b><br>Site RD17<br>Site 5<br>Site 9<br>Policy 4<br>Policy 5<br>Chapter 6 |
|---|---|---|

**HOLMES, D (87713) (DHS)**

|  |                               |                             |
|--|-------------------------------|-----------------------------|
| <b>Written Representation:</b><br>DHS/W/1, submitted by D Holmes | <b>Objection:</b><br>88713/1D | <b>Plan Ref:</b><br>Site 17 |
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**LYDNEY LAND RESOURCES (65984) (LLR)**

|  |                                |                               |
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| <b>Written Representations:</b><br>LLR/W/1, submitted by S Rees of Greenfield Associates<br>LLR/DOC/1, submitted by S Rees: site plan on Site RD17a, showing existing site operations and landholding boundaries | <b>Objection:</b><br>65984/3RD | <b>Plan Ref:</b><br>Site RD17 |
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**MESSIER- DOWTY (88642) (MDY)**

|   |                                |                            |
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| <b>Written Representation:</b><br>MDY/W/1, submitted by B Teed of Messier-Dowty | <b>Objection:</b><br>88642/1RD | <b>Plan Ref:</b><br>Site 9 |
|---|--------------------------------|----------------------------|

**NATIONAL COUNCIL OF WOMEN, CHELTENHAM BRANCH (89727) (NCW)**

|  |  |   |
|--|--|---|
| <b>Written Representation:</b><br>NCW/W/1, submitted by D Edmonds of NCW | <b>Objections:</b><br>89827/2D<br>89827/3D | <b>Plan Refs:</b><br>Chapter 4<br>General |
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**NMB GROUP PLC (89826) & PORSCHE CLUB OF GREAT BRITAIN (89814) – JOINT CASE (WHP)**

|  |   |  |
|--|---|--|
| <b>Inquiry Proof:</b><br>WHP/P/1 & WHP/DOC/1 (appendices),<br>submitted by J Hargreaves of Woods Hardwick Planning | <b>Objections:</b><br>89826/1, /4D<br>89814/1, /2, /4D<br>89826/2D<br>89826/3, 89814/3D | <b>Plan Refs:</b><br>Site 7<br>Site 7<br>Chapter 4<br>Policy 7 |
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**PRICE, B, A, H and M (88638, 88639, 88640, 88641) – JOINT CASE (BJP)**

|   |  |  |
|---|--|--|
| <b>Written Representation:</b><br>BJP/W/1, submitted by B Price | <b>Objections:</b><br>88638/1D<br>88638/2D<br>88639/1D<br>88640/1D<br>88641/1D<br>88638/1RD<br>88638/2RD<br>88639/1RD<br>88639/2RD<br>88640/1RD<br>88640/2RD<br>88641/1RD<br>88641/2RD | <b>Plan Refs:</b><br>Site 6<br>General<br>Site 6<br>Site 6<br>Site 6<br>Site RD2<br>RD Schedule 2<br>Site RD2<br>RD Schedule 2<br>Site RD2<br>RD Schedule 2<br>Site RD2<br>RD Schedule 2 |
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**READ, G M (88535) (GMR)**

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| <b>Written Representations:</b><br>GMR/W/1, submitted by C Down<br>GMR/W/1.1, submitted by C Down: rebuttal to WPA 217<br>GMR/W/1.2, submitted by C Down: re questions raised by inspector during site visit<br>GMR/W/2, submitted by C Down: response to WPA 31a | <b>Objection:</b><br>88535/1D | <b>Plan Ref:</b><br>Omission Site<br>as above<br>as above |
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**RIDLINGTON, A (62748) (RID)**

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| <b>Written Representation:</b><br>RID/W/1, submitted by A Ridlington | <b>Objection:</b><br>62748/1 | <b>Plan Ref:</b><br>Chapter 4 |
|--|------------------------------|-------------------------------|

**ROBERT HITCHINS LTD (89808) (RHL)**

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| <b>Inquiry Proofs:</b><br>RHL/P/1, submitted by P Hardwick of Robert Hitchins Ltd<br>RHL/P/2, submitted by P Hardwick<br>RHL/P/3 & /P/3.1, submitted by P Hardwick<br>RHL/P/4, submitted by P Hardwick | <b>Objections:</b><br>89808/17D<br>89808/18D<br>89808/4RD<br>89808/9D | <b>Plan Refs:</b><br>Site 1<br>Site 2<br>RD18<br>Site 8 |
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| <b>Gloucestershire County Council Waste Local Plan 2002 – 2012 – Inspector's Report</b> |
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RHL/P/5, submitted by P Hardwick  
RHL/P/6, submitted by P Hardwick

89808/6D  
89808/7D,/3RD

Site 16  
Site 17,/RD17

**SIMPSON, C (98701) (CSN)**

**Written Representation:**  
CSN/W/1, submitted by C Simpson

**Objection:**  
98701/1RD

**Plan Ref:**  
Site RD23

**SOUTH GLOUCESTERSHIRE COUNCIL (62048) (SGC)**

**Written Representation:**  
SGC/W/1, submitted by E Allison of South Glos Council

**Objection:**  
62048/1D

**Plan Ref:**  
Policy 6

**STOKE ORCHARD PARISH COUNCIL (61865) (SPC)**

**Inquiry Proof:**  
SPC/P/1, submitted by C Adamson (chair)

**Objections:**  
61865/1D  
61865/2D

**Plan Refs:**  
Site 1  
Site 2

**STROUD DISTRICT COUNCIL (62041) (SDC)**

**Written Representation:**  
SDC/W/1, submitted by Karen Dickson of Stroud D C

**Objection:**  
62041/4RD

**Plan Ref:**  
RD Schedule 2  
RD3

**SWINDON BOROUGH COUNCIL (62063) (SBC)**

**Written Representation:**  
SBC/W/1, submitted by D Slatter of Swindon Borough Council

**Objections:**  
62063/4RD  
62063/5RD

**Plan Refs:**  
Policy 4  
Policy 5

**TEWKESBURY BOROUGH COUNCIL (62044) (TBC)**

**Inquiry Proofs:**  
TBC/P/1, submitted by L Belfield of Tewkesbury B C  
TBC/P/3, submitted by L Belfield  
TBC/DOC/1: inspector's decision on appeals by Bovis, Arlington Securities plc and P & O Developments Ltd on land adjoining the A417 at Brockworth, Gloucestershire, plus Plan and Agreement and Undertaking

**Objections:**  
62044/2D  
62044/1D,/1RD

**Plan Refs:**  
Site 8  
Sites 3 & RD3

**Written Representation:**  
TBC/W/1, submitted by L Belfield

**Objection:**  
62044/3D

**Plan Ref:**  
Site 9

**VISION 21 (63039) (V21)**

**Round Table Submission:** V21/RTS/1 (Waste Management Methods), submitted by C Harmer of Vision 21  
V21/RTS/DOC/1: Fact Sheet Municipal Solid Waste (Compact Power)  
V21/RTS/DOC/2: Solutions to Waste (Compact Power)

**Inquiry Proofs**  
V21/P/1 & V21/P/1.1, submitted by Mr C Harmer of Vision 21

**Objection:**  
63039/4D

**Plan Ref:**  
Policy 26

**WESTBURY-ON-SEVERN PARISH COUNCIL (61897) (WPC)**

**Written Representation:**  
WPC/W/1, submitted by C Evers (Parish Councillor)

**Objection:**  
61897/1D

**Plan Ref:**  
Para 2.10

