

DRAFT CBC RESPONSE TO GLOUCESTERSHIRE WASTE CORE STRATEGY – PUBLICATION VERSION

Cheltenham Borough Council wishes to make the following comments in relation to the Gloucestershire Waste Core Strategy (WCS) – Publication Version.

Recognising that this consultation is primarily aimed at assessing the soundness and legal compliance, Cheltenham Borough Council has no objection to the legal compliance or soundness of the Core Strategy but would like to make the following comments:

Strategic Objective 2 – Re-use, Recycling and Composting

Whilst the council is supportive of the strategic objective of achieving at least 60% of household waste to be recycled/composted by 2020 with an aspiration of achieving 70%, this will also have operational implications for both the County and the districts in terms of levels of vehicles and depots required and the promotion of the reduce/recycle/re-use agenda. Any increase in re-use, recycling and composting will reduce the amount of residual waste and therefore will have implications on the amount, location and type of resource required across the county. Therefore, any proposals should ensure that they are sustainable in the long term, as well as the short term, as would not wish to see a position where new plants become unviable due to insufficient waste thus resulting in the need to import significant amounts from elsewhere in the country.

Core Policy WCS4 – Other Recovery (including energy recovery)

The Council continues to support the general principle that waste facilities should be located in close proximity to waste arisings and accepts that this will necessitate the majority of strategic waste treatment facilities being located in the “Zone C”. Whilst the allocation of disposal sites close to collection areas offers advantages in terms of reducing carbon emissions and provides operational and financial efficiencies, this needs to be balanced against the impact of such sites on the existing, and potential, communities living in close proximity.

The Council welcomes the criteria based approach to additional/alternative sites that may come forward in the future for strategic and non-strategic sites. Any new sites, occurring as a result of the criteria based policy, either of strategic or non-strategic nature should consider the journey times and distances from collection point to disposal as significant savings in cost and CO² emissions can be achieved through reduced vehicle mileage.

The Council acknowledges that the WCS is ‘technology neutral’ and therefore does not include reference to specific technologies, as such, Cheltenham Borough Council has been restricted to commenting on the principle of waste treatment on strategic sites and reserves the right to further comment to specific uses at a later date and at the planning application stage. Cheltenham Borough Council, whilst recognising the benefits that result in terms of economies of scale and carbon savings that result from utilising central sites close to waste arisings, would have very significant concerns if support for a specific site implied the processing of hazardous waste, and/or the production of toxic end products in a location close to centres of population. Cheltenham Borough Council therefore wishes to reiterate concerns over the potential proximity to any possible North West Urban Extension to the hazardous waste plant at Wingmoor Farm and will take account of the most up to date information contained within the Wingmoor Waste Treatment Plant and Landfill Sites Community Health Impact Assessment (HIA).

Cheltenham Borough Council does not necessarily support the County's potential approach for Javelin Park to provide a 'one site solution' to residual waste, as consider the significance of journey times and distances from collection point to disposal point as an important factor in reducing carbon emissions and making operational and financial efficiencies. If the decision is taken to have a single site to accommodate residual waste recovery, then this needs to be supported by the provision of appropriate waste transfer facilities elsewhere in the county. Core Policy WCS4 does not make reference to the possibility of a one site solution to residual waste recovery, but it is recommended that the policy or supporting text be expanded to include a requirement to provide waste transfer stations should such an approach be explored.

Wingmoor Farm East and West

In principle, the Council continues to support the use of existing waste treatment sites, as opposed to building new sites, however wish to reiterate the following in relation to Wingmoor Farm.

- The proximity to any possible urban extension at North West Cheltenham¹ needs to be considered and, in practice, may prove unacceptably close. The Council reserves the right to object to specific uses on this site. The specific type of facility promoted on the site will need to take into account the potential impact on existing residential properties and those that may come forward in the future.
- Development of this site may have impacts on the Wingmoor Farm Meadow Gloucestershire Wildlife Trust Reserve and suitable mitigation measures may be required at the application stage.
- Development of this site has the potential to increase traffic on the A435, A4019 and A40 in and around Cheltenham. This increase in traffic needs to be considered in conjunction with increases which could result from the proposed urban extension at North West Cheltenham.
- Consideration will need to be given to the potential for increased surface water flooding resulting from development of the site. This needs to be considered in conjunction with the proposed urban extension to the south of the site.

Cheltenham Borough Council reserves the right to further comment at the planning application stage of the strategic sites identified by the WCS

¹ The Council would like to make it clear that any references to urban extensions as proposed by the draft Regional Spatial Strategy for the South West (RSS) do not imply that they are supported and the Council remains opposed to significant elements of the RSS. The Council is specifically opposed to the construction of the proposed NW extension, for reasons which include its proximity to existing and proposed waste treatment sites.