

**Agenda 5**  
**Planning Committee**

**ADDITIONAL REPRESENTATIONS SHEET**

Date: 17th August 2021

The following is a list of the additional representations received since the Planning Committee Agenda was published and includes background papers received up to and including the Monday before the meeting. A general indication of the content is given but it may be necessary to elaborate at the meeting.

Item No	
5a	<p><b>21/00019/FUL</b></p> <p><b>Part Parcel 0250, Manor Lane, Gotherington, Cheltenham, Gloucestershire,</b></p> <p>Playspace and LEAP</p> <p>Details of an on-site LEAP have not been agreed with the applicant and neither has a financial contribution to suitable off-site provision. The applicant has advised that they would prefer to make a financial contribution towards existing play equipment in Gotherington but officers have concerns that the existing facilities at Freemans Field would not be easily accessible for future residents as required by Policy RCN1 of the Adopted Tewkesbury Local Plan. <b>In the absence of an agreement for either on-site provision or a contribution towards off-site provision, officers recommend reason for refusal 6 is amended to state:</b></p> <p><b>Reason for Refusal 6</b></p> <p>In the absence of appropriate planning obligations and on-site provision of a Local Equipped Area of Play, the proposed development does not adequately provide for open space, outdoor recreation and sports facilities and the proposal conflicts with Policy RCN 1 of the Tewkesbury Borough Local Plan to 2011 (March 2006), Policies INF4, INF6 and INF7 of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy 2011 - 2031 (December 2017) and the National Planning Policy Framework</p> <p><b>Ecology</b></p> <p>Further to the preparation of the committee report, the applicant has submitted additional ecology reports including Dormouse and Great Crested Newts Mitigation Strategies. The Council's ecological advisors have been re-consulted and advise that there are no objections to the application subject to the imposition of appropriate planning conditions to secure the ecological mitigation.</p> <p><b>Trees</b></p> <p>Further to the Tree Officers concerns raised in paragraph 7.101 of the Committee Report that additional information and details are required on the planting of trees, including within the built up area, the applicant has advised that 'it is simply not possible to fundamentally redesign the scheme to a provision for all the streets to be tree-lined one week prior to determination'. The applicant also advises that 'The level of tree planting at the entrance and along the main road on the eastern side with larger tree species (oak/beech/lime) to create a sense of arrival and provide more ecological and amenity benefit is surely better from an arboricultural standpoint instead of installing smaller street trees?' and that 'Given that a requirement for detailed soft landscaping is expected via condition, we can have a look at this and place an emphasis on the use of specimen shrubs as focal points in the front gardens throughout the development and more trees in the rear gardens to avoid a major redesign'.</p>

	<p>Officers have considered these comments and consider that should planning permission be granted, there would be sufficient scope to secure additional tree planting within the development as a whole via planning condition to mitigate the concerns of the Tree Officer.</p> <p>County Council requested planning obligations to education and libraries</p> <p>Officers have received no update from the County Council regarding the quantum of the requested planning obligations to education and library facilities.</p>
5b	<p><b>20/00956/FUL</b></p> <p><b>25 Paynes Pitch, Churchdown, Gloucester, Gloucestershire, GL3 2NT</b></p> <p><b>Since the preparation of the committee report 4 additional objections have been received raising the following points:</b></p> <ul style="list-style-type: none"> <li>- Concerns about impact on ecology and hedgehogs.</li> <li>- Concerns about the impact of the construction phase and use of vehicles on minor roads and that the County Highways Authority have not robustly considered the proposal.</li> <li>- The construction method statement states that parking space for 10 vehicles will be provided on site, but space is only shown for 2.</li> <li>- Any right of access, which in any event has been mitigated by a longstanding agreement, does not create a right of build or development over the parcel of land to the north of Dunstan Glen which should legally be left in situ.</li> <li>- The proposed dwellings do not reflect the grain of the locality and their character is an offence to the surroundings and harmful to the built environment.</li> <li>- The loss of trees would contribute to climate change and the new tree planting will take many years to mature and provide any benefits.</li> <li>- Whilst Dunstan Lodge is in a poor state of repair it is capable of restoration and conversation which will allow the preservation of a heritage building however designated. There are several local examples of period dwellings in a similar state being restored and which are a shining example of responsible curating of the village.</li> <li>- Developers with a sense of community engagement should be willing to demonstrate the cost effectiveness or otherwise of a build and sell/let scheme for Dunstan Lodge.</li> </ul> <p>A local resident has also advised planning officers that there has been a material change in aspects of land ownership related to this application. The resident advises that Bovis Homes have now given the resident 'The Sole Ownership of the Land and its Title Deeds' for that part of the site which contains the hedgerow adjacent to the north of Dunstan Glen. The resident advises that 'If the applicant is successful in this planning application there are aspects of the proposals which I will not give permission to implement across my land. Notwithstanding they have the legal right to gain access over my land to facilitate road access from Dunstan Glen to the curtilage of Dunstan Lodge'.</p> <p>Planning officers have asked the resident for copies of the relevant documents to substantiate these statements, but they have not been provided albeit extracts of email conversations have been provided.</p> <p>Planning officers advise the Committee that paragraphs 7.9 to 7.11 of the Committee Report refer to matters of land ownership and the lawfulness of the implementation is a matter for the applicant.</p>

	<p><b>Amendments to Conditions</b></p> <p><b>Since the preparation of the committee report officers recommend the following changes to the recommended conditions:</b></p> <p>A new construction method statement has been submitted to demonstrate the 10 vehicles can be parked within the confines of the site boundary. It is recommended that condition 18 is updated to refer to this updated statement to state:</p> <p><b>Condition 18</b></p> <p>The development, including any works of demolition, shall only take place in accordance with the submitted Demolition &amp; Construction Method Statement received on 10th August 2021 and shall be adhered to throughout the construction period.</p> <p>Reason: In the interests of safe operation of the adopted highway in the lead into development both during the demolition and construction phase of the development.</p> <p>There have also been ongoing discussions with the applicant regarding the treatment of level changes to the parcel of land to the south of 23 Paynes Pitch which falls from south to north. It has been agreed that these matters can be considered as part of any discharge of conditions application and therefore it is recommended that conditions 4 and 5 be amended to state:</p> <p><b>Condition 4</b></p> <p>Notwithstanding the submitted details, no development shall be undertaken above DPC level until the existing and proposed levels across the site including the land to the south of 23 Paynes Pitch, and relative to adjoining land, together with the finished ground levels, floor levels and ridge levels of the proposed dwelling hereby approved have been submitted and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.</p> <p>Reason: In the interest of residential and visual amenity</p> <p><b>Condition 5</b></p> <p>Prior to the occupation of the dwellings hereby permitted, details of all walls, fencing and other means of enclosure shall be submitted and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details prior to the first occupation of the dwellings hereby permitted.</p> <p>Reason: To provide adequate privacy and an acceptable external appearance.</p>
5e	<p><b>21/00398/FUL</b></p> <p><b>Land South Of Wheatpieces, Walton Cardiff, Tewkesbury, Gloucestershire,</b></p> <p><b>A petition with 418 signatories has been received</b>, however no specific reason for their objection to the proposal is given.</p> <p><b>A further letter of representation has been received from a local resident</b> which seeks a controlled crossing over Bluebell Road. The highway implications of the proposal have been assessed and a specific crossing is not considered necessary.</p> <p><b>A letter of representation has been received from the applicant</b> and has also been sent to Members of the planning Committee a copy is <b>attached to this report</b>.</p> <p>The recommendation remains as set out in the Committee Report.</p>

5h	<p><b>21/00631/FUL</b></p> <p><b>Greensleeves Shooting Club, The Range, The Park, Stoke Orchard, Cheltenham, Gloucestershire,</b></p> <p><b>Revised Condition</b></p> <p>Since writing the committee report an updated Site Location Plan and Proposed Block Plan has been submitted which shows the footprint of the proposed cover more accurately than the original versions. As such Condition 2 needs to be amended to the following:</p> <p>Unless where required or allowed by other conditions attached to this permission, the development hereby approved shall be carried out in accordance with the information provided on the application form, including details of the proposed materials and finish of the cover, and the following plans/drawings/documents:</p> <ul style="list-style-type: none"> <li>- Site Location Plan (dated 06.08.21)</li> <li>- Proposed Block Plan (dated 05.08.21)</li> <li>- 3D View - Drawing No. G(2)</li> </ul>
5i	<p><b>21/00767/FUL</b></p> <p><b>The Kneelings, Dog Lane, Witcombe, Cheltenham, Gloucestershire, GL3 4UG</b></p> <p><b>Officer Update</b></p> <p>This application was supported by a Planning Statement which included, inter alia, the applicant's case in terms of the impact of the proposed development upon the Green Belt. The applicant considers that the proposed extension would result in an increase in Gross External Area (GEA) of 17.15% from the original building as it existed on 1 July 1948 and therefore the development would result in a proportionate addition over and above the size of the original building. In coming to this conclusion, for the purposes of this proposal, the applicant has derived the 'original building' to be that as shown on an Ordnance Survey (OS) Map which was revised in 1939 and published in 1947 (see Figure 9 in the Planning Statement). The extract shows the outline of what appears to be the main dwelling and three other buildings, joined together.</p> <p>Officers note the position advanced by the applicant, however when taking account of the information from the historic maps dated from 1922 to 1974 and the earliest planning history of the application site held by the Council, your officers are not convinced that the 'three other buildings' shown on the published 1947 OS Map would have been used for residential purposes as part of the main dwelling, they may have been small farm buildings or stable buildings. Given the level of uncertainty it was considered it would be reasonable to establish whether the proposed extension would result in a disproportionate extension or addition from the building as shown in the earliest plans held by the Council of the dwelling, which are dated 1965.</p>
5k	<p><b>21/00515/FUL</b></p> <p><b>Land At Ashville Business Park, Commerce Road, Churchdown, Gloucester, Gloucestershire,</b></p> <p><b>Additional Consultation Response</b></p> <p>The County Highways Authority has raised no objection to the application and has not recommended the imposition of any highways related planning conditions.</p>

5l	<p><b>21/00494/FUL</b></p> <p><b>Brock Farm, Church Lane, Staverton, Cheltenham, Gloucestershire, GL51 0TW</b></p> <p><b>Officer Update</b></p> <p>Additional information has been received from the applicant in response to those comments raised by the Council's Agricultural Consultant. It is asserted that the availability of alternative accommodation within the applicant's ownership (Nos. 1 &amp; 2 Church Cottages, Staverton) has been incorrectly assessed. Paragraph 7.23 of the Officer's Committee Report sets out that it is likely at least one of the cottages would be on an Assured Shorthold Tenancy and therefore considered potentially available. However, the applicant has indicated that both properties are on Protected Tenancies (lifetime protection with succession rights) and cannot be considered available for the purposes of meeting the identified functional need associated with the new farming enterprise (calf rearing).</p> <p>The Agricultural Consultant has provided an updated response. It is commented that if Nos. 1 &amp; 2 Church Cottages are on Protected Tenancies, with no other dwellings within easy access of Brock Farm, then a temporary dwelling would be considered essential subject to the calf building being permitted. However, it is advised that copies of the tenancy agreements and/or statutory declarations from the occupiers should be submitted in order to fully consider the security of tenure of either cottage. The applicant has been notified of this request for additional information but has been unable to provide the relevant documentation in advance of the application being presented to Planning Committee.</p> <p>It is also materially relevant that the 'essential need' for the temporary farm worker accommodation is heavily reliant on the proposed calf building (ref: 21/00211/FUL) being permitted. This application is still pending consideration and it would be somewhat premature to determine the current application ahead of that concerning the proposed calf building.</p> <p>For these reasons, the officer recommendation has been updated to <b>DEFER</b> to allow for the requested information to be provided and for planning application 21/00211/FUL to be determined. The application will return to Planning Committee once these matters have been addressed.</p>
6a	<p><b>21/00807/CM</b></p> <p><b>Wingmoor Quarry And Landfill, Stoke Road, Bishops Cleeve, Cheltenham, Gloucestershire, GL52 7DG</b></p> <p><b>Additional Representations</b></p> <p>1. A joint letter in support of the planning application has been received from <b>Tewkesbury Borough Council's (TBC) Head of Community Services and Cheltenham Borough Council's (CBC) Environmental Partnerships Manager</b>. A copy of the letter has been appended to the Late Representations Sheet for Members' full consideration although a summary of the points raised has been provided below:</p> <ul style="list-style-type: none"> <li>- Direct delivery of residual household waste to the Energy from Waste facility (Javelin Park) would result in a significant increase in vehicular movements and emissions on the M5. For both authorities, there would be an increase of approximately 9,043 vehicular movements per year to Javelin Park if the Grundons' local waste transfer site was unavailable.</li> <li>- Highways [England] made their recommendations on the planning application for the Energy from Waste (EfW) facility on the basis of waste from CBC and TBC being bulk transferred thereby limiting the additional vehicular movements. Direct delivery of residual</li> </ul>

	<p>household waste to the EfW facility would be contrary to Highways England's recommendation.</p> <ul style="list-style-type: none"> <li>- Gloucestershire County Council arranges for the bulk hauling of waste from [the application site] which equates to 1052 trips. If TBC and CBC were required to direct deliver residual household waste to Javelin Park then this would result in 10,162 trips down the M5 motorway. This would result in an additional 273 tonnes of CO2 being released into the environment.</li> <li>- If this application was not permitted then it is likely that direct delivery of waste to Javelin Park would increase vehicular movements on the local road network increasing congestion and emissions.</li> <li>- Odours from the open-air landfill site at Wingmoor Farm will have reduced following the cessation of TBC and CBC's household residual waste being tipped at this site in July 2019. 30% of TBC's household waste goes direct to Javelin Park, with the remaining 70%, along with all of CBC's household residual waste, being tipped under cover at the Material Recycling Facility (MRF) building for onward bulk haulage to Javelin Park thereby minimising any odour pollution.</li> <li>- Neither food nor garden waste is disposed of at the application site.</li> <li>- It is acknowledged that there are local concerns over odour in the area but the Environment Agency, who have carried out monitoring, and the Gloucestershire County Council Waste Disposal Authority have confirmed that any odours do not originate from the waste transfer station with the exception of one incident in November 2020.</li> </ul> <p>There are '<b>Other Considerations</b>' discussed within the supporting letter but it should be made clear that these are not material planning considerations and cannot be taken into account when debating the planning application.</p> <p>2. An identical letter of support has been received from <b>Councillor Iain Dobie, Cabinet Member - Waste, Recycling and Street Services, Cheltenham Borough Council</b>. This letter has been appended to the Late Representations Sheet but a summary has not been provided below for the avoidance of repetition.</p> <p><b>Additional Information</b></p> <p>The applicant has submitted additional information to Gloucestershire County Council (GCC) in response to the comments made on the planning application both by consultees and the public. Please see attached in full.</p> <p><b>There is no change to the Officer report in light of this additional information and it is recommended that the Planning Committee RESOLVE to raise no objection to the planning application.</b></p>
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Our ref: NR/AW

WITHOUT PREJUDICE

11<sup>th</sup> August 2021

By Email

Mr P Skelton  
Tewkesbury Borough Council

Dear Mr Skelton

RE: Planning Committee 17 August 2021 – Agenda Item 5(e) Bloor Homes application for the erection of a two-storey office development (Use Class E) on Land South of Wheatpieces, Walton Cardiff, Tewkesbury (Ref. 21/00398/FUL)

I write with reference to the above full planning application which will be considered by you and your fellow Councillors at the Tewkesbury Borough Council Planning Committee meeting on Tuesday 17<sup>th</sup> August 2021.

We are very pleased that your Officers support the proposals and are recommending that the application is approved. I trust that you will be reassured to learn that prior to the application being submitted, Bloor entered into a period of formal pre-application advice with the Borough Council and Gloucestershire County Council as the Highway Authority which influenced the application submission; particularly in respect of the design and layout of the proposed two-storey offices, structural landscaping and highway access considerations. Throughout the course of determination of the application Bloor has continued to liaise closely with Officers to consider consultation responses and discuss any necessary revisions to the proposed development arrangements that will be before you for determination.

As you may be aware, Bloor Homes is a family owned, private company and our Western Regional Offices are based at Furrowfield Park in Tewkesbury. The Western Region covers Gloucestershire, Herefordshire, Worcestershire, parts of Warwickshire and West Oxfordshire. Bloor has successfully operated from our Furrowfield Park premises for over 14 years during which time we have delivered a number of high quality residential developments within the Western region as a whole and Tewkesbury Borough in particular; to include sites at Wheatpieces, Stoke Orchard and Winchcombe.

The Western office has experienced a period of managed growth over this period commensurate with the year on year growth of the business and the number of new homes we deliver across the Region. Such has been the success of our activity that for the third consecutive year, Bloor Homes has been awarded 5-star builder status by the HBF based on their annual New Homes Customer Satisfaction Survey. Indeed, you may be interested to learn that the Western Office currently has a Customer Satisfaction rating of 97.5%; the highest in the Bloor Group.

As such, we like to think that Bloor Homes Western is a success story for the Borough; one which makes an important contribution to the local economy and its economic well-being. As well as employing 50 office based staff across a range of disciplines (a large number of whom are local residents) the regional office and our house building activities also directly and indirectly support a large number of jobs in the local construction and service sector, with associated expenditure on goods, supplies and services in the Borough.

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Our Wheatpieces housing development was also the regional base for the Western region's Apprenticeship Training Centre; providing site-based training and skills development in brick laying and carpentry overseen by Apprentice Training Masters. Indeed, Bloor's commitment to supporting construction opportunities for young and local people; both on site and office based, is such that across the Bloor Group around 15% of our employees consist of current or former apprentices and trainees.

However, we have now outgrown our Furrowfield Park premises and there are no opportunities to physically extend the building or convert internal space. Even with the introduction of flexible working arrangements, the constrained office space and car parking limitations are preventing future growth and job creation.

The need to move is pressing and the key objective behind the application proposal is to move to new purpose built offices in Tewkesbury which will enable Bloor to stay in the Borough and facilitate our growth plans. This will see the company expand from 50 to 60 office based staff over the next 5 years, as well as providing a Regional Training Centre for our site-based staff. The new offices will represent a direct investment of around £5m by Bloor.

The search for a new site and/or freehold premises was on-going for a period of 18 months and was led by myself in liaison with Senior Officers of the Borough Council and local agents. The area of search initially focused upon Tewkesbury before expanding to consider the outskirts of Cheltenham. Unfortunately, we were unable to find suitable premises which met our requirements which led us to carefully consider the opportunity presented by land which we own off Bluebell Road, Wheatpieces on which to construct a new office to be built to the BREEAM 'Very Good' standard.

Needless to say the potential for Bloor to relocate to this site was the first matter discussed with your Officers during pre-application advice. As was confirmed by the formal advice received, the proposed development is considered appropriate in principle in consideration of the prevailing development plan policy framework. That said, Officers highlighted that particular regard would need to be paid to securing an acceptable design and landscaping for the proposed development given the edge of settlement location of the site.

As a consequence of the pre-application advice received and the post submission engagement we are, therefore, pleased to see from Committee Report that your Officers' professional judgement is that our proposal is supported and recommended for approval.

I enclose for your information a copy of the submitted Offices Street Scene drawing (I recommend you zoom in to best view the details).

We trust that this 'without prejudice' update is helpful in setting out the rationale for the planning application and I thank you for taking the time to read this letter.

Yours sincerely



STEVE ROBERTS  
REGIONAL MANAGING DIRECTOR



Community Services  
Peter Tonge  
Head of Community Services



Planning Committee  
Tewkesbury Borough Council  
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09 August 2021

Dear Committee Members

**Planning Application: 19/0066/TWMAJW (TBC Ref – 21/00807/CM)**

We write on behalf of Tewkesbury Borough Council and Cheltenham Borough Council in support of the above mentioned planning application.

Under direction from Gloucestershire County Council, the waste disposal authority, both of our councils have used Grundon's Waste Management at Wingmoor Farm (East) Stoke Road Bishops Cleeve as a waste transfer site for household residual waste (refuse) before onward transportation to Javelin Park energy from waste (EfW) site for the last 2 years which is a separate facility from the landfill site operated nearby. Work has been undertaken to seek to source an alternative waste transfer station and there are none available with the logical geographical area.

We would like to draw to your attention to relevant material planning considerations as set out below however there are also other considerations summarised in this letter which we believe planning officers and members of the committee should also be aware of as background context.

#### **Material planning considerations: negative environmental impact**

##### **1. Increased vehicular movements and emissions on the M5 to Javelin Park**

If the planning application is not approved, an alternative disposal point will be required for all of Cheltenham's household residual waste and the remaining 70% of Tewkesbury's which is not currently direct delivered to Javelin Park as the disposal point. Given there is no alternative local waste transfer station available to facilitate bulking of residual waste for onward haulage to Javelin Park, both authorities will be required to direct deliver all of its residual household waste to this location on the M5.

Direct delivery will result in a significant increase in the number of refuse vehicles driving on the road network to Javelin Park, a greater amount of emissions and mileage driven with the associated negative environmental impact, something both local authorities have tried to reduce and avoid in their support of the climate emergency. The road network is already congested at peak times during the day and during school holidays. Future road infrastructure improvements near J9 and 10 of the M5 or any associated with the GCHQ cyber-park on the A40 in Cheltenham are likely to worsen this situation due to the disruption likely to be caused by such extensive roadworks.

Tewkesbury Borough Council is currently responsible for 1,052 vehicle movements to Javelin Park (direct delivery) per year plus approximately 364 vehicular movements from Grundon's local waste transfer site to Javelin Park via bulk haulage vehicles per year for the remaining waste not direct delivered to Javelin Park, resulting in a total of approximately 1,416 vehicular movements per year to Javelin Park.

The number of vehicular movements to Javelin Park, if local waste transfer at Grundons was unavailable, would **increase from approximately 1,416 to at least 4,432 vehicular movements per year.**

In mileage terms, this equates to a change from approximately 33,186 miles per year to Grundons to approximately 126,245 miles per year to Javelin Park, an increase of approximately 93,059 miles per year. This will mean that there is an **increase of 113 tonnes of CO<sub>2</sub> being released into the environment based on the calculated mileage**

Cheltenham Borough Council is currently responsible for approximately 1,116 vehicle movements to Javelin Park per year for all household residual waste via bulk haulage vehicles from Grundons' waste transfer site.

The number of vehicular movements to Javelin Park, were Cheltenham unable deliver to Grundons' waste transfer site locally and had to direct deliver, would increase from approximately 1,116 to approximately 5,730 per year, **an increase of approximately 4,614 vehicular movements per year.**

In mileage terms, this equates to a change from approximately 22,920 miles per year to Grundons to approximately 154,710 miles per year to Javelin Park, an increase of approximately 131,790 miles per year. This will mean that there is an **increase of 160 tonnes of CO<sub>2</sub> being released into the environment (based on the calculated mileage).**

**For both authorities, there would be an increase of approximately 9,043 vehicular movements per year to Javelin Park if the Grundons' local waste transfer site was unavailable.**

The Highways Agency provided recommendations on the EfW planning application on the basis of the waste from Cheltenham Borough Council and Tewkesbury Borough Council being bulk transferred thereby limiting the additional vehicular movements. If direct delivery was the only option open to both Councils then this would go against the Highways Agency recommendation.

Currently the County Council arrange for the bulk hauling of the waste from the Grundon facility and this equates to 1052 trips. If the Councils need to direct deliver this will lead to 10,162 trips down the motorway to Javelin Park. This will mean that there is a **total increase of 273 tonnes of CO<sub>2</sub> being released into the environment.**

There are a number of considerable non-material planning considerations which we would like the Planning Committee to be cognisant of and whilst we accept that they are not material in planning terms believe that the Committee should be aware of them.

## **2. Increased local vehicle movements and emissions**

If the need to direct deliver to Javelin Park necessitates the purchase of additional vehicles for both household waste collection and street cleansing, which is expected to be the case as set out below, more vehicles are likely to be driving around the local road network increasing congestion and emissions.

## **3. Odours**

Since the cessation of both Cheltenham and Tewkesbury's household residual waste being tipped at the open air landfill site at Wingmoor Farm in July 2019, odours at this site from municipal waste will have reduced. Approximately 30% of Tewkesbury Borough Council's household residual waste now

goes directly to Javelin Park and the remaining 70% of Tewkesbury's household waste, along with all of Cheltenham's household residual waste is now tipped under cover in the waste transfer site building for onward bulk haulage to Javelin Park minimising any odours. In addition, both authorities DO NOT dispose of food and garden waste at this Grundon's waste transfer site, further minimising any odours. We acknowledge that there are recent local concerns over odour in the area but the Environment Agency, who have carried out monitoring and Gloucestershire County Council Waste Disposal Authority have confirmed that any odours do not originate from the waste transfer station with the exception of one incident in November 2020.

#### **4. Other considerations:**

##### **Financial consequences**

With regard to the financial consequences to the council taxpayer. In 2018 Gloucestershire County Council considered directing our Councils to direct deliver our residual household waste to Javelin Park. Upon further consideration of the facts it became obvious that the costs and environmental dis-benefits of doing so were prohibitive for both Borough Councils and the County Council agreed that the best value option for all Councils involved was to commission a waste transfer station and bulk haul the waste down to Javelin Park.

The associated costs to both Councils of having to direct deliver their waste are set out below.

The actual costs that the Boroughs will incur if direct delivery is necessary are significant and relevant to the calculation of, 'expenditure reasonably incurred by the WCA in delivering waste to a place which is unreasonably far from the WCA's area'.

Capital expenditure will be required to purchase additional refuse, street cleansing and bulky waste collection vehicles as the current fleet numbers will not be able to complete all of the current service requirements in the boroughs due to the additional time that will be required to tip at Javelin Park. The capital purchase of vehicles would either require borrowing with a revenue implication for repayment and interest, or a loss of revenue on interest gained on reserves.

The tables below show the estimated additional unbudgeted capital and revenue costs for the Boroughs respectively arising out of the requirement to direct deliver waste to Javelin Park calculated in 2018 and therefore underestimate the current costs:

<b>Cheltenham Borough Council</b>	
<b>Total Capital Costs</b>	<b>£824,000</b>
<b>Total One Off Revenue Costs associated with Change</b>	<b>£465,722</b>
<b>Total Annual Ongoing Revenue Costs (annual revenue cost plus satellite depot cost)</b>	<b>£1,093,295</b>

<b>Tewkesbury Borough Council</b>	
<b>Total Capital Costs</b>	<b>£503,000</b>
<b>Total One Off Revenue Costs associated with Change</b>	<b>£395,464</b>
<b>Total Annual Ongoing Revenue Costs (annual revenue cost plus satellite depot cost)</b>	<b>£937,224</b>

If the planning variation is not agreed, there would not be sufficient time to procure new vehicles and so there would be additional short/medium term hire costs to manage until the newly procured additional vehicles arrived. Leaving the EU has also exacerbated the problem as vehicle supply times are considerably longer the previously meaning they could take more than a year to manufacture and deliver.

The one off Service Change Costs incurred include project support to implement the direct delivery option, project management, rerouting, procurement of vehicles, communicating with residents and contingency budget to deal with service change issues at time of change.

These costs are incorporated into the tables above as total one off revenue associated with change and were calculated in 2018 therefore these costs will have increased now.

It is therefore evident that not agreeing to the planning variation will only result in additional costs to the collection authorities (TBC and CBC) and these would likely have to be passed on to the taxpayer.

#### **Depot Capacity**

The Boroughs share a depot at Swindon Road, Cheltenham. Ubico has confirmed that there will not be the necessary capacity to store and maintain the increased number of vehicles at the depot so an additional site would be needed, with all of the associated on-costs of acquisition/rent, offices, welfare facilities, utilities, security, management and supervision which will also add cost to the operation. These additional costs will only result in additional costs to the collection authorities (TBC and CBC) and these would also likely have to be passed on to the taxpayer.

In addition, the current Ubico Operators licence does not allow for the number of proposed additional vehicles and it can take up to 26 weeks to amend an Operator's licence.

#### **National Driver Shortage**

The national driver shortage is well documented on the national news. Ubico are already struggling to attract and retain enough drivers for the current number of vehicles operating. This situation will be significantly exacerbated for both councils should we need to operate more vehicles as a result of not allowing the variation to the contract which is being sought.

We are not incognisant of the problems that residents are suffering with as a result of the waste operations in the Wingmoor Farm area, particularly the open landfill site, and work hard with the operator and the Environment Agency to address those problems and will continue to do so. The alternative, however, will cause significant disruption to all of the residents across both of the councils' areas. Therefore we consider that the best outcome for all of the residents of both Boroughs is that the Planning Committee will allow the variation as requested.

#### **Disruption to residents**

The need to direct deliver to Javelin Park will require rerouting of rounds to ensure that services operate efficiently. These changes will not only affect refuse rounds but will impact on recycling, food waste and garden waste rounds, as if day changes are required to make refuse rounds more efficient, all other service rounds would need to be rerouted to match the refuse round, as to avoid confusion as residents expect their collections to be on the same day.

Residents will need to be informed of these changes which will incur costs and there will be confusion as both Councils have had significant day or week change to all the services and rounds in the last few years.

Experience has shown that any rerouting exercise will result in increased missed collections as crews will need to learn new rounds and this will have an impact on customer services teams in terms of increased number of calls and resident dissatisfaction.

The direct delivery option not only impacts on the collection services but also impacts the street cleansing services and trade waste collection services. There will be a reduction in service levels if these vehicles need to tip at Javelin Park as there will be less time to carry out works as more time will be required to get to the tipping point.

### **Ubico/Council Resources**

As Ubico Ltd deliver the services on behalf of both of the Boroughs, if the direct delivery option needs to be implemented significant Ubico resources will be required for this project. This will not only impact on the authorities directly affected but will also have an impact on other authorities that Ubico provide services for as resources will have to be directed away from planned works to the direct delivery mobilisation project.

There will also be an impact for the other services and staff that the Boroughs employ such as customer services, finance, legal/ procurement, communications and IT teams which will need to support the role of any service changes.

Project management for procurement and mobilisation of new vehicles and rounds for both councils would reduce Ubico and council officer time for carrying out other projects in the work and business plans. This would not be limited to waste officers, and so additional project support would be required.

Both authorities hope that you will take into account the material planning considerations set out at the beginning of this letter.

Yours sincerely

**Peter J Tonge**  
**Head of Community Services**  
**Tewkesbury Borough Council**

**Karen Watson**  
**Environmental Partnerships Manager**  
**Cheltenham Borough Council**



Marcus Sparrow  
Senior Planning Officer  
Gloucestershire County Council  
Shire Hall  
Westgate Street  
Gloucester GL1 2TG

ask for: Councillor Iain Dobie  
tel number: 01242 262626  
email: [Cllr.iain.dobie@cheltenham.gov.uk](mailto:Cllr.iain.dobie@cheltenham.gov.uk)  
our ref:  
your ref: 19/0066/TWMAJW  
date: 10 August 2021

Dear Mr Sparrow

**Planning Application: 19/0066/TWMAJW**

As Cheltenham Borough Council's cabinet member for waste, recycling and street services I am committed to supporting initiatives which improve our environment and therefore the climate emergency facing all of us. I am therefore writing to you as cabinet member in strong support of the above mentioned planning application.

I am aware that, under direction from Gloucestershire County Council both Cheltenham and Tewkesbury Borough Councils have used Grundon's Waste Management at Wingmoor Farm (East) Stoke Road Bishops Cleeve as a waste transfer site for household residual waste which is then transported to Javelin Park energy from waste site for the last 2 years which is a separate facility from the landfill site operated nearby. It appears there is no alternative waste transfer site available to us locally.

Whilst officers have written separately, I feel this issue may present such a negative impact on the environment that I also need to draw to your attention what I believe to be relevant material planning considerations but there are also other considerations which planning officers and members of the committee should be aware of.

**Material planning considerations: negative environmental impact**

**1. Increased vehicular movements and emissions on the M5 to Javelin Park**

If the planning application is not approved, an alternative disposal point will be required for all of Cheltenham's household residual waste and the remainder of Tewkesbury's which is not currently direct delivered to Javelin Park as the disposal point. Given there is no alternative local waste transfer station available to facilitate bulking of residual waste for onward haulage to Javelin Park, both authorities will be required to direct deliver all of its residual household waste to this location on the M5.

Direct delivery will result in a significant increase in the number of refuse vehicles driving on the road network to Javelin Park, a greater amount of emissions and mileage driven with the associated negative environmental impact, something both local authorities have tried to reduce and avoid in their support of the climate emergency. The road network is already

congested at peak times during the day and during school holidays. Future road infrastructure improvements near J9 and 10 of the M5 or any associated with the GCHQ cyber-park on the A40 in Cheltenham are likely to worsen this situation due to the disruption likely to be caused by such extensive roadworks.

I am advised that Tewkesbury Borough Council is currently responsible for approximately 1,416 vehicular movements per year to Javelin Park. The number of vehicular movements to Javelin Park, if local waste transfer at Grundons was unavailable, would **increase from approximately 1,416 to at least 4,432 vehicular movements per year**. In mileage terms there will be an **increase of 113 tonnes of CO2 being released** into the environment per year based on the calculated mileage.

Cheltenham Borough Council is currently responsible for approximately 1,116 vehicle movements to Javelin Park per year for all household residual waste via bulk haulage vehicles from Grundons' waste transfer site. The number of vehicular movements to Javelin Park, were Cheltenham unable deliver to Grundons' waste transfer site locally and had to direct deliver, would increase from approximately 1,116 to approximately 5,730 per year, **an increase of approximately 4,614 vehicular movements per year**.

In mileage terms, this equates to a change from approximately 22,920 miles per year to Grundons to approximately 154,710 miles per year to Javelin Park, an increase of approximately 131,790 miles per year. This will mean that there is an **increase of 160 tonnes of CO2 being released** into the environment per year (based on the calculated mileage).

**For both authorities, there would be an increase of approximately 9,043 vehicular movements per year to Javelin Park if the Grundons' local waste transfer site was unavailable. This will generate an additional 273 tonnes of CO2 being released into the environment.**

I am aware that the Highways Agency provided recommendations on the EfW planning application on the basis of the waste from Cheltenham Borough Council and Tewkesbury Borough Council being bulk transferred thereby limiting the additional vehicular movements. I am unclear why we would want to go against the Highways Agency recommendation.

## **2. Increased local vehicle movements and emissions**

If the need to direct deliver to Javelin Park necessitates the purchase of additional vehicles for both household waste collection and street cleansing, which is expected to be the case as set out below, more vehicles are likely to be driving around the local road network increasing congestion and emissions.

## **3. Odours**

Since Cheltenham and Tewkesbury's household residual waste stopped being tipped at the open air landfill site at Wingmoor Farm in July 2019, odours at this site from municipal waste will surely have reduced. Approximately 30% of Tewkesbury Borough Council's household residual waste now goes directly to Javelin Park and the remaining 70% of Tewkesbury's household waste, along with all of Cheltenham's household residual waste is now tipped under cover in the waste transfer site building for onward bulk haulage to Javelin Park minimising any odours. In addition, both authorities DO NOT dispose of food and garden waste at this Grundon's waste transfer site, further minimising any odours. I am advised that there are recent local concerns over odour in the area but the Environment Agency, who have carried out monitoring and Gloucestershire County Council Waste Disposal Authority

have confirmed that any odours do not originate from the waste transfer station with the exception of one incident in November 2020.

#### **4. Other considerations:**

There are a number of other considerations which I believe the Planning Committee should be aware of and whilst I understand that they are not material in planning terms, I believe that the Committee should be aware of them.

##### **Financial consequences**

With regard to the financial consequences to the council taxpayer, these are considerable as set out by officers in their letter. Gloucestershire County Council and both borough councils came to a sensible agreement to mitigate both environmental and financial consequences of direct delivery to Javelin Park in 2018. I do hope the council tax payer can avoid this burden again now but the high level cost estimates calculated at that time are set out below:

<b>Cheltenham Borough Council</b>	
<b>Total Capital Costs</b>	<b>£824,000</b>
<b>Total One Off Revenue Costs associated with Change</b>	<b>£465,722</b>
<b>Total Annual Ongoing Revenue Costs (annual revenue cost plus satellite depot cost)</b>	<b>£1,093,295</b>

<b>Tewkesbury Borough Council</b>	
<b>Total Capital Costs</b>	<b>£503,000</b>
<b>Total One Off Revenue Costs associated with Change</b>	<b>£395,464</b>
<b>Total Annual Ongoing Revenue Costs (annual revenue cost plus satellite depot cost)</b>	<b>£937,224</b>

It is therefore evident that not agreeing to the planning variation will only result in additional costs to the collection authorities (TBC and CBC) and these would likely have to be passed on to the taxpayer.

##### **Depot Capacity**

The Boroughs share a depot at Swindon Road, Cheltenham. Ubico has confirmed that there will not be the necessary capacity to store and maintain the increased number of vehicles at the depot so an additional site would be needed, with all of the associated on-costs of acquisition/rent, offices, welfare facilities, utilities, security, management and supervision which will also add cost to the operation. These additional costs will only result in additional costs to the collection authorities (TBC and CBC) and these would also likely have to be passed on to the taxpayer.

##### **National Driver Shortage**

The national driver shortage is well documented on the national news. Ubico are already struggling to attract and retain enough drivers for the current number of vehicles operating. This situation will be significantly exacerbated for both councils should we need to operate more vehicles as a result of not allowing the variation to the contract which is being sought.

**Disruption to residents**

The need to direct deliver to Javelin Park will require rerouting of rounds to ensure that services operate efficiently. These changes will not only affect refuse rounds but will impact on recycling, food waste and garden waste rounds, as if day changes are required to make refuse rounds more efficient, all other service rounds would need to be rerouted to match the refuse round, as to avoid confusion as residents expect their collections to be on the same day.

Residents will need to be informed of these changes which will incur costs and there will be confusion as both Councils have had significant day or week change to all the services and rounds in the last few years.

Experience has shown that any rerouting exercise will result in increased missed collections as crews will need to learn new rounds and this will have an impact on customer services teams in terms of increased number of calls and resident dissatisfaction.

**Ubico/Council Resources**

As Ubico Ltd deliver the services on behalf of both of the Boroughs, if the direct delivery option needs to be implemented significant Ubico and Council resources will be required for this project. This will not only impact on the authorities directly affected but will also have an impact on other authorities that Ubico provide services for as resources will have to be directed away from planned works to the direct delivery mobilisation project.

I do hope that you will take into account the material planning considerations set out at the beginning of this letter.

Yours sincerely,

Councillor Iain Dobie  
Cabinet Member - Waste, Recycling and Street Services  
Cheltenham Borough Council



Marcus Sparrow  
Senior Planning Officer

30<sup>th</sup> July 2021

Strategic Infrastructure  
Planning Development Management  
**Gloucestershire County Council**  
Shire Hall  
Westgate Street  
Gloucester, GL1 2TH

**Re: 19/0066/TWMAJW - Variation of condition 7 (Buildings, plant and machinery) and 19 (Hours of operation) relating to planning consent 17/0066/TWMAJW dated 19/10/2017 at Wingmoor Farm East, Stoke Road Bishops Cleeve, GL52 7DG**

Dear Mr Sparrow,

This letter provides an additional information and clarification to the comments made on the above planning application by both consultees and the public.

**1. Retrospective application and appropriateness of the planning submission**

It should be acknowledged that the current live planning application, ref. no 19/066/TWMAJW, was submitted to the Local Planning Authority (LPA) in December 2019 (informal project discussions with Gloucestershire CC (GCC) and preparation of the planning application took place prior to the formal submission). Despite a number of Grundon's enquiries about the validation of the application, it has taken the LPA a considerably long time (circa 16months) to register the application (although we understand that the national health crisis may have contributed to this delay to a certain extent).

The residual waste bulking and transfer operations at the Material Recovery Facility (MRF) have been considered as not impacting on or changing the current MRF use and the planning basis for the existence of the proposal has been investigated and considered to be acceptable under the existing planning consent. It has been confirmed that the proposed operation is not a 'change of use' matter that would require the submission of a new planning application. Such interpretation was confirmed in the legal advice letter (dated 7<sup>th</sup> March 2019) which was consequently agreed to by the LPA when the application was registered and an EIA Screening Opinion was issued (dated 26<sup>th</sup> April 2021).

**2. Traffic movement**

Under the current consent (PP 17/0066/TWMAJW, condition 5a) the MRF is permitted to receive up to 50,000 tonnes of general non-hazardous waste per annum. The vehicle movements associated with the operation of the MRF, when working at its full capacity, has been originally comprehensively assessed based on the annual waste throughput limit and the envisaged traffic was calculated at an average of 80 two-way movements per day (40 in and 40 out). These are expected to be permitted movements, although not specifically restricted by a planning condition. The assessment has also

taken into consideration various vehicle types and on that basis any potential impacts have been assessed on the local road network and the sensitive receptors along the local roads.

As demonstrated in the Planning Application Supporting Statement (PASS para. 2.3 and abstract from weighbridge data provided in Appendix 2), prior to the residual waste bulking and handling operation, the MRF was accepting up to 15,000 tonnes of waste yearly with an average two-way vehicle movements of 26 per day (13 in and 13 out). It was envisaged that the new contract would increase the amount of waste delivered to the site to its full permitted capacity, and it was expected it to be in a range of 35,000 tonnes per annum with predicted two-way vehicular movements of 54 per day (27 in and 27 out).

The residual waste contract is ongoing and the actual data is now available for this operation. The last twelve months of data have been obtained from the weighbridge and a summary table is provided in Figure 1 (Wingmoor Farm East MRF weighbridge /12 months data (01.05.2020 30.04.2021)/). This demonstrates the inbound and outbound vehicular movements monthly/daily and the overall throughput of recyclable and residual waste in the past 12 month's period. The proposed operation consequently, and as predicted, utilised the capacity gap at the MRF.

Data confirms that the current vehicular movements from and to the MRF is lower than that envisaged at the time of the contract and does not exceed the vehicular movements permitted for the MRF site. The total RCVs/HGVs movements at the MRF (for both recyclable and residual waste streams) accounts to, on average, 40 one-way movements per day as detailed below.

On average there were 13 one-way RCVs/HGVs deliveries of recyclable waste to the MRF monthly. On average there were 20 one-way RCVs/HGVs deliveries of residual waste from Tewkesbury and Cheltenham boroughs to the MRF daily. On average 6 articulated vehicles left the MRF daily to deliver the residual waste to Javelin Park.

During the past year (May 2020 – May 2021) 46,554 tonnes of waste was received into the Materials Recovery Facility. This figure comprises 10,450 tonnes of recyclable waste and 36,403 tonnes of Council's household waste.

All vehicles travel directly to/from the east of the site using Stoke Road and not via Stoke Orchard village. Bulked residual waste from Gloucestershire is transferred from the MRF to Javelin Park via 'A' type roads and M5. The traffic associated with the site takes place within the permitted operational hours. An adequate car park provision is present at the site and there is no parking outside the site boundaries.

Previously, all residual waste deliveries from Cheltenham and Tewkesbury boroughs went to the Enovert landfill site (located at: Stoke Road, Bishops Cleeve, GL52 7RS). To access the site all such traffic would pass the Wingmoor Farm East MRF site (the Application Site) and travel c.1.5 km further west to arrive at the landfill. All such residual waste traffic have been therefore passing Grundon site previously. It is understood that such arrangement was carried out for many years and vehicular movements associated with the Council's household waste disposal have been included in the usual traffic movements around Bishop's Cleeve/Stoke Road.

Since the Councils' household waste is now recovered at the EfW facility rather than disposed of at the landfill waste is mostly being delivered to the Wingmoor Farm East MRF first, where unacceptable items that are apparent are removed (such as plastic, metal, inert materials, EE waste etc.), waste are then bulked and transferred to Javelin Park.

To our knowledge a proportion of Tewkesbury borough's waste is also directly delivered to the EfW at Javelin Park where this is considered appropriate for the efficient use of the limited Council fleet as direct delivery ties up the vehicles and their crews for a long journey. A one year data was obtained from the Gloucestershire Waste Unit to demonstrate the number of movements directed to Javelin Park EfW by Tewkesbury BC, refer to Figure 2 (Tewkesbury Borough Council residual waste direct deliveries to Javelin Park /12 months data (01.05.2020-30.04.2021)/). On average there were 4 one-way RCVs/HGVs deliveries of residual waste directly from Tewkesbury BC to the EfW facility daily.

The RCVs/HGVs movements around Bishops Cleeve have been therefore reduced by this number compared to the previous landfilling arrangements.

Figure 3 (Residual waste traffic movement around Bishops Cleeve Stoke Road) shows a simple analysis between previous and current arrangements in regards to GCC's household waste management to demonstrate the overall increase/decrease of number of RCV/HGV movements around Bishop's Cleeve/Stoke Road since the commencement of bulking and transfer of residual municipal waste to and from the MRF at Wingmoor Farm East. A conclusion was drawn that currently there is a small daily net increase in traffic movement around Bishops Cleeve/Stoke Road of on average 2 vehicles.

### **3. Green Belt**

The Green Belt designation is of a particular importance to the proposed development due to the Wingmoor Farm East location in the Green Belt area.

Further consideration is given below to the location of proposed operation within the Green Belt, the objectives of Green Belt policy and whether this operation is appropriate in that context.

#### **3.1. National and Local Policy**

The protection of the Green Belt land is considered in the **National Planning Policy Framework (NPPF, March 2012, latest update July 2021)**.

The fundamental aim of Green Belt is to, para. 37 and 38:

*"... prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.*

*Green Belt serves five purposes:*

- a) to check the unrestricted sprawl of large built-up areas;*
- b) to prevent neighbouring towns merging into one another;*
- c) to assist in safeguarding the countryside from encroachment;*
- d) to preserve the setting and special character of historic towns; and*
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land."*

Para. 147 and 148 consider the proposals effecting the Green Belt and state that:

*"Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.*

*When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations."*

**Minerals National Planning Practice Guidance (NPPG, Live, launched in March 2014) notes that:**

*"Assessing the impact of a proposal on the openness of the Green Belt, where it is relevant to do so, requires a judgment based on the circumstances of the case. By way of example, the courts have identified a number of matters which may need to be taken into account in making this assessment. These include, but are not limited to:*

- openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;*
- the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and*
- the degree of activity likely to be generated, such as traffic generation." (Paragraph: 001 Reference ID: 64-001-20190722; Revision date: 22 07 2019*

**Gloucestershire Waste Core Strategy** (November 2012, WCS) is a core local policy framework document that address the issue of planning for waste management in Gloucestershire in the period 2012 to 2027.

Core Policy WCS13 – Green Belt states that:

*"There will be a presumption against proposals for waste management that amounts to inappropriate development within the Gloucester – Cheltenham Green Belt except where it can be demonstrated that there are 'very special circumstances'.*

*'Very special circumstances' to justify inappropriate waste development proposals will not exist unless the totality of the harm to the Green Belt and any other harm can be clearly outweighed by other considerations.*

*Where the proposal involves the re-use of an existing building in the Green Belt:*

*- It must not have a materially greater impact than the existing building on the openness of the Green Belt and the purpose of including land within it; (...)"*

### **3.2. Principles**

Gloucestershire has rich natural environment including extensive areas of Green Belt which amount to a large part of the area between Gloucester and Cheltenham of over 8,000 hectares. The potential constraints arising from the Green Belt designation, and other national designations, in finding waste management sites close to the sources of the waste arising is acknowledged by the County.

The protection of the Green Belt is vitally important, however GCC recognises the locational needs of some types of waste management facilities, as well as the wider environmental and economic benefits of sustainable waste management that may need to occur in the Green Belt.

Some of Gloucestershire's principal waste management facilities are therefore already located within the Gloucester-Cheltenham Green Belt. The Wingmoor Farm East is a strategic waste management integrated facility in the County, as indicated in the WCS plan, and remains a material consideration until replaced.

Any proposals coming forward on Wingmoor Farm East need to accord with the requirements of Core Policy WCS13 relating to the Green Belt.

The aim of this policy is to safeguard the Gloucester – Cheltenham Green Belt from inappropriate development that would compromise the objectives of the designation.

Waste related development within the Green Belt will only be permitted where specified criteria can be met and 'very special circumstances' are demonstrated. The planning permission may be granted in 'very special circumstances' that outweigh any potential harm to the Green Belt.

The matters which may indicate that very special circumstances could exist in relation to waste related proposals might include the lack of suitable and available non - Green Belt sites. A proposal would need to indicate the need for the facility to be located where it is proposed such as proximity to the main waste arising, or a relationship to an existing waste management facility. The proposal would need to demonstrate that it does not conflict with the purposes of Green Belt designation and the positive contribution that can be made by the development to the use of land in the Green Belt.

The Gloucestershire WCS states that the continuing role of landfill is recognised but increasingly seen as a last resort. It states that management of waste is a critically important issue. To do this effectively the appropriate, sustainable waste management facilities are needed; finding the right sites is a key. There is a need to provide a recovery capacity for residual waste and allow for their recovery value and energy from the waste such as creating heat and power instead of just burying it. This may be through appropriate supporting infrastructure, such as bulking and transfer, which could be done in the existing facilities, rather than in the new once, that could be expanded or where sufficient capacity gap exists.

### **3.3. Is proposed development inappropriate in the Green Belt? Demonstration of 'very special circumstances'**

a) It is our view that the proposal is not inappropriate development in the Green Belt. This is for the following reasons:

- There is no change of use (it is not a new development),

The Wingmoor Farm Integrated Waste Management Facility is an established existing waste management site and the 'very special circumstances' need for its location in the Green Belt has been already proven and accepted by the LPA.

When the planning consent was granted in 2012, allowing a time extension to the operation of the waste management facility (including the MRF) and its integrated infrastructures, it was established to be wholly appropriate for the existing operations at Wingmoor Farm to continue having regard to key planning policy principles for sustainable waste management and the Green Belt.

The local planning authority has therefore consistently considered that the grant of planning permission for the use of land at the application site for waste management uses is acceptable in the Green Belt, subject to the maintenance of high environmental standards and ensuring that the site is well restored.

The residual waste bulking and transfer operation is not causing a change of use of the land and is accepted to be of a similar nature to other operations occurring at the MRF.

- It is using an existing waste management building (which is a temporary use and this application doesn't vary this),

The proposed bulking and transfer of Councils' household waste is to be a temporary operation at Wingmoor Farm East MRF, only for duration of the waste contract. The proposal is entirely contained within the MRF building (takes alternatively small space within the building) and does not alter the building in any form or shape, either it effects any other elements of the built environment surrounding the building.

- There is no intensification of use (traffic) and no visual change,

The residual waste bulking and transfer operation expand the overall operation at the MRF site, in terms of waste throughput and vehicular movement, in comparison to that taking place prior to the residual waste bulking and transfer, however it does not exceed the permitted limits, already assessed and deemed acceptable for the MRF site.

Previous arrangements for the Councils' residual waste disposal were that all vehicles travelled to the nearby to Wingmoor Farm East landfill site via Stoke Road/Stoke Orchard Road and therefore the vehicles would have been passing the MRF site, which is closer than the previous destination point, to travel further west. Those traffic movements previously associated with the Councils' residual waste were therefore existing and already included in the traffic count around Bishops Cleeve.

On simple analysis of current and previous Council's household waste management arrangements it has been concluded that the residual waste traffic around Bishops Cleeve/Stoke Road has increased by 2 one-way movements daily, which is considered an insignificant minor increase.

The residual waste tipping takes place within the MRF in the dedicated waste bay that is kept to one side of the building far from the recyclable waste which provides a good buffer zone between the two waste streams with any potential for contamination kept to a minimum.

- There is no harm to the Green Belt or impact on openness.

The MRF and the surrounding built environment are of a temporary nature and subject to future landfilling with non-hazardous waste. When the landfill cell is complete the land will be restored in line with the approved restoration scheme. In addition, some restoration actions close to the MRF are taking place this year. This relates to the tree planting on the strip of land immediately to the west of the MRF site entrance.

The proposed operation subject to this planning application does not impact on the site restoration scheme or extend the date it has to be completed by. A large area of land at Wingmoor Farm has been already restored and is in agricultural use. The remaining areas are upcoming restoration as phased in the approved scheme (the entire waste use at Wingmoor Farm East will be finalised and site restored by mid-2030).

b) If GCC considers that the use to be inappropriate we set out below the 'very special circumstances'.

It is understood that one of the main reasons for GCC awarding the contract to Grundon is the lack of suitable facilities nearby that the Council could use around Bishops Cleeve for bulking and transfer of locally collected household waste in order to deliver them to EFW facility. The Wingmoor Farm East MRF enables such operation that if not undertaken would be possibly impacting on the residual waste recovery target expected to be achieved in Gloucestershire. The MRF site helps to bring the residual waste up the waste hierarchy due to the waste being used as a fuel to generate energy at the Javelin Park EFW facility.

It is understood that Gloucestershire Waste Authority considered the new arrangement to be most prudent and efficient. Multiple RCV journeys to the distant EfW are replaced by one HGV bulker journey significantly reducing carbon emissions from road transport. The economic benefits via more efficient use of collection vehicles and crews should be also taken into consideration.

The use of the existing temporary waste management building does not change the visual appearance of the area nor impact on the aims of the Green Belt or its openness. There is no intensification of use at the site as the tonnage handled and vehicle numbers are in line with the current permission.

The proposal is a temporary arrangement for the duration of the contract and does not extend the permitted duration of the MRF and the restoration of the area back to agriculture and woodland. In overall terms there are fewer HGVs on the local network compared to historic levels when the waste was landfilled.

A conclusion has been drawn that the location of the proposed operation within the MRF at Wingmoor Farm East provides a viable, sustainable and practicable solution to meet the local household waste need objectives.

#### **4. Odour nuisance and environmental monitoring**

The proposed operation introduces the residual municipal waste that are more prone to odour emission compared with other waste handled at the MRF. Although, it is not considered that this would have any direct impact upon the objectives of the Green Belt designation itself, however the amenity matters are important and particularly the potential odour implications in this instance should be further examined.

The large number of objections from the local residence in relation to the odour nuisance are noted. A number of mitigation measures have been in place since the residual waste operation has started. However, in direct response to the local complaints, that the site only recently has been made fully aware of, the following actions are taking place to tackle the odour issue:

- Grundon have stopped accepting odorous loads and are carrying out regular FID (Flame ionizing detector) tests around the facility.
- The monitoring of odour emissions around the yard at least twice per day in various areas, the main area being in front of the doors to the MRF.
- The odour neutralizer is being used during all operational hours.
- The residual waste bays are regularly emptied, cleaned and sanitized.
- The road sweeper is run through the area (an regularly checking the road immediately off site)
- The deposited waste are being regularly turnover to ensure the earlier delivered waste are taken off site first.
- The turnover time has been shortened and residual waste is transferred off site to Javelin Park EfW on same day or within the 24hours period from its delivery.
- No residual waste, however small or for however short period of time, are being kept outside the building awaiting transfer. Vehicles are also not left outside loaded overnight.
- Vermin control is contracted out with weekly visits for bait boxes and through the summer months.
- Grundon have fly spraying performed, where the building is filled with mist /fog twice a week.

It should be also noted that the Wingmoor Farm East is subject to number of wider environmental monitoring, which include: dust, gas, groundwater and surface water. The monitoring is ongoing and

has been carried out for many years. The monitoring point plan is included in Figure 4 (Wingmoor Farm East\_Monitoring point locations) for reference.

As the MRF is located within the landfill boundary area, all the monitoring would be relevant to their activities. Some of the perimeter monitoring points are in close proximity to the MRF. The gas and water monitoring takes place on the boundary of the site and the dust monitors provide constant monitoring at a number of locations around the site. In close proximity to the MRF building there are gas (marked GM) and ground water (marked GW) monitoring points as well as a dust monitor that operates continuously sampling the air for PM10 and PM2.5 particulates. Weekly FID walks around the site permit boundary, to detect any gas emission to air at the site boundary, as also carried out.

##### 5. Conclusion

This planning application made under the Section 73 of the Town and Country Planning Act 1990 (as amended) is considered appropriate planning submission in the context of the planning system.

On the careful consideration of the robust information in relation to site location within the Green Belt area it has been concluded that the proposed operation is not considered inappropriate development. However, if the LPA is of a different view it has been proven that a 'very special circumstances' exists and have been demonstrated in this instance. The proposed operation brings environmental benefits over the previous landfilling method at the neighbouring Wingmoor Farm landfill site and it is concluded that the Policy WCS13 (Green Belt) of the Gloucestershire Waste Core Strategy has been satisfied.

We trust that the information provided within this letter is satisfactory, addresses the objections raised and contributes to the positive recommendation of this planning proposal to the planning regulatory committee meeting.

Yours sincerely,

[Redacted]  
*Monika Gogol*  
Planning & Development Manager

**Figure 1:** Wingmoor Farm East MRF weighbridge /12 months data (01.05.2020 – 30.04.2021)/

Summary

		Inbound RCV&HGV movement (one way )	Inbound (total weight) tonnes	Outbound RCV&HGV movement (one way)	Outbound recovered (total weight) tonnes	Total RCV&HGV movement (one way)	Average RCV&HGV movement (one way)
		per month	per month	per month	per month	per month	per day
May-20	recycling	161	484.4	38	473.8	199	10
	residual	453	3029.3	125	2858.1	578	28
	<b>total</b>	<b>614</b>	<b>3513.7</b>	<b>163</b>	<b>3331.9</b>	<b>777</b>	<b>38</b>
Jun-20	recycling	222	552.8	26	379.0	248	10
	residual	476	3163.5	135	3141.2	611	25
	<b>total</b>	<b>698</b>	<b>3716.3</b>	<b>161</b>	<b>3520.3</b>	<b>859</b>	<b>36</b>
Jul-20	recycling	286	798.5	50	756.1	336	13
	residual	483	3209.4	141	3222.3	624	25
	<b>total</b>	<b>769</b>	<b>4007.9</b>	<b>191</b>	<b>3978.4</b>	<b>960</b>	<b>38</b>
Aug-20	recycling	277	804.0	57	703.6	334	15
	residual	414	2712.4	119	2661.5	533	24
	<b>total</b>	<b>691</b>	<b>3516.3</b>	<b>176</b>	<b>3365.1</b>	<b>867</b>	<b>39</b>
Sep-20	recycling	359	1031.2	73	956.6	432	18
	residual	454	3070.2	134	3037.6	588	25
	<b>total</b>	<b>813</b>	<b>4101.4</b>	<b>207</b>	<b>3994.2</b>	<b>1020</b>	<b>43</b>
Oct-20	recycling	349	1084.2	72	1063.0	421	17
	residual	460	3079.6	129	3008.2	589	24
	<b>total</b>	<b>809</b>	<b>4163.9</b>	<b>201</b>	<b>4071.3</b>	<b>1010</b>	<b>41</b>
Nov-20	recycling	302	852.4	68	927.2	370	16
	residual	432	2922.1	127	2938.2	559	24
	<b>total</b>	<b>734</b>	<b>3774.5</b>	<b>195</b>	<b>3865.3</b>	<b>929</b>	<b>40</b>
Dec-20	recycling	331	1180.7	68	987.6	399	17
	residual	457	3035.8	127	2908.6	584	25
	<b>total</b>	<b>788</b>	<b>4216.5</b>	<b>195</b>	<b>3896.1</b>	<b>983</b>	<b>43</b>
Jan-21	recycling	291	910.3	57	901.0	348	15
	residual	498	3211.3	141	3262.3	639	28
	<b>total</b>	<b>789</b>	<b>4121.6</b>	<b>198</b>	<b>4163.3</b>	<b>987</b>	<b>44</b>
Feb-21	recycling	280	761.0	60	907.3	340	15
	residual	411	2713.4	116	2714.3	527	24
	<b>total</b>	<b>691</b>	<b>3474.3</b>	<b>176</b>	<b>3621.6</b>	<b>867</b>	<b>39</b>
Mar-21	recycling	284	864.3	50	909.4	334	13
	residual	477	3170.3	134	3085.5	611	24
	<b>total</b>	<b>761</b>	<b>4034.6</b>	<b>184</b>	<b>3994.9</b>	<b>945</b>	<b>38</b>
Apr-21	recycling	286	826.9	44	736.5	330	14
	residual	460	3086.0	133	3083.0	593	26
	<b>total</b>	<b>746</b>	<b>3912.9</b>	<b>177</b>	<b>3819.5</b>	<b>923</b>	<b>40</b>

Annual throughput (tonnes)	Inbound	Outbound
	recycling	10,150.6
	residual	36,403.4
	<b>total</b>	<b>46,554.0</b>
		9,701.0
		35,920.8
		45,621.8

**Figure 2:** Tewkesbury Borough Council residual waste direct deliveries to Javelin Park  
(12 months data, 01.05.2020-30.04.2021)

Summary table

	<b>Sum of Tonnes</b>	<b>Number of monthly deliveries</b>	<b>Number of daily deliveries (average)</b>
May-20	544.0	72	4
Jun-20	633.4	91	4
Jul-20	511.4	71	3
Aug-20	506.2	71	3
Sep-20	636.9	90	4
Oct-20	<b>474.4</b>	69	3
Nov-20	589.3	87	4
Dec-20	568.9	87	4
Jan-21	510.4	70	3
Feb-21	510.1	85	4
Mar-21	669.8	97	4
Apr-21	539.2	86	4
<b>Grand Total</b>	<b>6,693.9</b>	<b>976</b>	

*Note: Data provided by Gloucestershire Waste Management Unit*

**Figure 3: Residual waste traffic movement around Bishops Cleeve Stoke Road**

Current arrangement (GCC's contract with Grundon; residual waste recovered in EfW)

	most residual waste from Cheltenham and Tewkesbury boroughs to MRF	residual waste from MRF to EfW	sum
Daily average RCV&HGV movement (one way )	20	6	26

Previous arrangement (prior to contract with Grundon; residual waste disposed of at the landfill site)

	most residual waste from Cheltenham and Tewkesbury boroughs to landfill	those from Tewkesbury borough at present direct delivered to EfW	sum
Daily average RCV&HGV movement (one way )	20	4	24

*Note: It was assumed the same number of RCV/HGV in place then and/or the same number would be in place if residual waste were still disposed at the landfill*

Impact on Bishops Cleeve, Stoke Road (average daily, one-way)

Net gain/loss	2
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