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Gloucestershire Waste Core Strategy

SA/SEA Adoption Statement

Prepared by LUC
For Gloucestershire County Council
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Planning & EIA
Design
Landscape Planning
Landscape Management
Ecology
Mapping & Visualisation

LUC BRISTOL
14 Great George Street
Bristol BS1 5RH
Tel:0117 929 1997
Fax:0117 929 1998
bristol@landuse.co.uk

Offices also in:
London
Glasgow
Edinburgh



FS 566056
EMS 566057

Land Use Consultants Ltd
Registered in England
Registered number: 2549296
Registered Office:
43 Chalton Street
London NW1 1JD
LUC uses 100% recycled paper

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1 Introduction

- 1.1 Gloucestershire County Council (GCC) adopted its Waste Core Strategy on 21st November 2012. During preparation of the Waste Core Strategy, the Council was required by law to carry out a Sustainability Appraisal (SA) and a Strategic Environmental Assessment (SEA) of the plan as it developed. Both the SA and SEA requirements were met through a single process, the method and findings of which were described in a number of SA Reports published alongside the different versions of the Waste Core Strategy during its development.
- 1.2 Regulation 26 of the Town and Country Planning (Local Planning) (England) Regulations (2012) requires Gloucestershire County Council to make the final SA Report available alongside the Adopted Waste Core Strategy.
- 1.3 The final SA Report for the Adopted Waste Core Strategy comprises the following documents:
 - The **November 2010 SA Report**¹ prepared by external consultants (LUC) on behalf of GCC to accompany the Publication version of the Gloucestershire Waste Core Strategy [CD1.6²]. This includes the non-technical summary required by the SEA Directive.
 - The **June 2011 SA Report Update**³ prepared by GCC prior to Submission (to accompany the consultation on the Focused Changes to the Waste Core Strategy) [CD1.7].
 - The **April 2012 SA Addendum**⁴ ("Post-examination changes update to SA Report") prepared by LUC on behalf of GCC following the Examination in Public (to accompany the consultation on the Main Modifications to the Waste Core Strategy) [CD14.3].
 - The **April 2012 Addendum to Post-examination changes update to SA Report**⁵ prepared by GCC following the Examination in Public (to accompany the consultation on the Model Policy to be included in the Waste Core Strategy) [CD14.3.1].

Requirement for the SEA Adoption Statement

- 1.4 In addition to the Planning Regulations requirement for publishing the final SA Report alongside the Adopted Waste Core Strategy, the SEA Regulations⁶ also require a number of steps to be taken upon adoption of a local plan (in this case the Waste Core Strategy). Specifically, Regulation 16 sets out the post-adoption procedures for the SEA, and requires that, as soon as reasonably practicable after the adoption of a plan for which an SA/SEA has been carried out, the planning authority must make a copy of the plan publicly available alongside a copy of the SA report and an 'SEA adoption statement', and inform the public and consultation bodies about the availability of these documents. The consultation bodies are English Heritage, Natural England and the Environment Agency. The SEA adoption statement must explain:
 - How environmental (and sustainability) considerations have been integrated into the plan.
 - How the Environmental Report (contained within the SA Report) has been taken into account during preparation of the plan.
 - How the opinions expressed by the public, consultation bodies and where appropriate other European Member States, during consultation on the plan and Environmental/SA Report have been taken into account.

¹ Gloucestershire Waste Core Strategy Sustainability Appraisal Report. Prepared by LUC, November 2010.

² CD1.6 refers to the Core Document number given to the SA Report in the Core Document Library for the Waste Core Strategy (<http://www.goucestershire.gov.uk/article/107581/Core-Documents-Library-CD1-CD12>).

³ Gloucestershire Waste Core Strategy Focused Changes Sustainability Appraisal Report Update. Prepared by GCC, June 2011.

⁴ Gloucestershire Waste Core Strategy Main Modifications Sustainability Appraisal Addendum. Prepared by LUC, April 2012.

⁵ Addendum to CD14.3 Post-Examination Changes Update to SA Report. Prepared by GCC, April 2012.

⁶ The Environmental Assessment of Plans and Programmes Regulations 2004 - SI No. 1633.

- The reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with.
- The measures that are to be taken to monitor the significant environmental and sustainability effects of the implementation of the plan.

1.5 As the SEA process was incorporated into the SA process, this document constitutes the SA/SEA Adoption Statement for the Gloucestershire Waste Core Strategy, and is structured according to the SEA Regulation requirements listed above:

- **Section 2** explains who carried out the SA/SEA, and what assessment framework was used.
- **Section 3** summarises the links between the plan-making and SA/SEA processes, and how the SA/SEA recommendations were taken into account.
- **Section 4** summarises the consultation opinions provided on the SA/SEA and describes what changes were made to the SA/SEA process in response to these comments.
- **Section 5** describes the alternatives/options considered as part of the Waste Core Strategy development process, and why the preferred options were chosen.
- **Section 6** describes how the significant sustainability/environmental impacts of the Waste Core Strategy will be monitored.

2 How environmental and sustainability considerations have been integrated into the Waste Core Strategy

Iterative approach to the SA

2.1 The SA was undertaken iteratively by either GCC officers and/or the independent consultants (LUC) such that at each stage of the Waste Core Strategy's development, an assessment of the sustainability and environmental effects of the options for the Waste Core Strategy and subsequently its policies was made. SA Reports were produced to describe the approach taken, identify the effects, and put forward recommendations to avoid or minimise negative effects identified or enhance positive effects. In this way environmental and sustainability considerations were integrated into the Waste Core Strategy as it developed.

2.2 **Table 2.1** sets out the SA Reports that have been produced by GCC or LUC on behalf of GCC as part of the development of the Waste Core Strategy. A number of the earlier reports (in particular the SA Framework Context & Scoping Reports) were prepared for all the proposed documents in the Minerals and Waste Development Framework. LUC was appointed by GCC in February 2009 to undertake the next stages of the SA of the Waste Core Strategy up to Submission to the Secretary of State, and the outputs are also shown in **Table 2.1**.

Table 2.1 SA Reports produced for the Gloucestershire Waste Core Strategy

SA Document	Prepared by	Date
Original SA Framework Context & Scoping Report	GCC	Aug 2005
Update 1 SA Framework Context & Scoping Report	GCC	Nov 2005
Update 2 SA Framework Context & Scoping Report	GCC	Apr 2006
SA Report for the Waste Core Strategy Issues & Options	GCC	Jul 2006
SA Report for the Waste Core Strategy Preferred Options	GCC	Jan 2008
SA Framework Combined Context & Scoping Report for Waste Sites – <i>(added into Update 3 SA Framework Context & Scoping Reports Update 3)</i>	GCC	Jul 2008
Update 3 SA Framework Context & Scoping Report	GCC	Jan 2009
SA Report for the Waste Core Strategy Strategic Waste Site Options (Stage 1)	LUC (on behalf of GCC)	Apr 2009
SA Report for the Waste Core Strategy Strategic Waste Site Options (Stage 2)	LUC (on behalf of GCC)	Sep 2009
SA Report for the Waste Core Strategy Publication stage (<i>this version of the SA Report was then submitted to the Secretary of State</i>)	LUC (on behalf of GCC)	Nov 2010
SA Report Update prior to Submission (<i>to accompany the consultation on the Focused Changes to the Waste Core Strategy</i>)	GCC	Jun 2011
The April 2012 SA Addendum ("Post-examination changes update to SA Report") (<i>to accompany the consultation on the Main</i>)	LUC (on behalf of	April 2012

SA Document	Prepared by	Date
<i>Modifications to the Waste Core Strategy)</i>	GCC)	
Addendum to Post-examination changes update to SA Report (<i>to accompany the consultation on the Model Policy to be included in the Waste Core Strategy)</i>	GCC (quality assured/peer reviewed by LUC)	April 2012

Use of SA objectives that reflect the SEA topics

2.3 The way in which the environmental and sustainability effects of the Waste Core Strategy were described, analysed and compared was through the use of a set of SA objectives, known as the "SA Framework". GCC developed the original SA Framework for the Waste Core Strategy, which comprised 15 SA objectives, through a series of consultations with the public and relevant stakeholders such as Natural England and the Environment Agency. The policies of the emerging Waste Core Strategy were appraised against these objectives at both the Issues and Options and Preferred Options stages. However, prior to the SA of the waste site options, GCC reviewed the SA objectives to ensure that they were suitable for appraising specific potential waste sites. As a result of this review, some of the objectives were 'scoped out' and some others were split out into a number of separate objectives. More detailed information on the development of the site-focused SA Framework is available in the report: Sustainability Appraisal Context & Scoping Report for Strategic Waste Sites (July 2008).

2.4 The full set of SA objectives and sub-questions, or the "SA Framework", against which the potential waste management sites were appraised during the two stages of the Site Options consultation is set out in the Sustainability Appraisal Scoping Report (Update 3) (January 2009).

2.5 The revised SA Framework used to appraise the publication version of the Waste Core Strategy is structured into 24 "SA headline objectives" highlighting the key sustainability objectives for the Waste Core Strategy, 22 of which are shown in **Table 2.2**. Two additional SA objectives that had been 'scoped out' of the SA Framework prior to the SA of the Site Options consultation were 'scoped back in' to the SA Framework as they were considered to be relevant to the appraisal of the policies within the publication version of the Waste Core Strategy:

- **Original SA Objective 1:** To promote sustainable development and sustainable communities in Gloucestershire in particular giving people the opportunity to live in an affordable and sustainably designed and constructed home.
- **Original SA Objective 2:** To safeguard sites suitable for the location of waste management facilities or future mineral development from other proposed development.

Table 2.2 SA Headline Objectives used for the appraisal of the publication version of the Gloucestershire Waste Core Strategy

SA Objectives
Social
<ol style="list-style-type: none"> 1. To promote sustainable development and sustainable communities and improve the health and well-being of people living and working in Gloucestershire as well as visitors to the County. 2. To educate the public about waste issues and to maximise community participation and access to waste services and facilities in Gloucestershire. 3. To safeguard the amenity of local communities from the adverse impacts of waste development.
<i>Original SA Objective 1: To promote sustainable development and sustainable communities in Gloucestershire in particular giving people the opportunity to live in an</i>

affordable and sustainably designed and constructed home.

Economic

4. To promote **sustainable economic development** in Gloucestershire giving opportunities to people from all social and ethnic backgrounds.
5. To manage waste in an **economically sustainable** way through means that represent good value for tax payers in Gloucestershire.
6. To provide **employment opportunities** in both rural and urban areas of the County, promoting diversification in the economy.
7. To ensure that waste sites do not compromise the **safety of commercial or military aerodromes**.

*Original SA Objective 2: To **safeguard sites** suitable for the location of waste management facilities or future mineral development from other proposed development.*

Environmental

8. To protect, conserve and enhance **biodiversity** in Gloucestershire.
9. To protect, conserve and enhance the **landscape** in Gloucestershire.
10. To ensure that waste sites have the potential for adequate **screening and / or innovative design** to be incorporated.
11. To protect conserve and enhance Gloucestershire's **material, cultural and recreational assets**.
12. To protect conserve and enhance **geodiversity** in Gloucestershire.
13. To protect conserve and enhance **townscapes** and Gloucestershire's **architectural and archaeological heritage**.
14. To prevent **flooding**, in particular preventing inappropriate development in the floodplain and to ensure that waste development does not compromise sustainable sources of water supply.
15. To **prevent pollution** and to apply the precautionary principle in consultation with waste regulation authorities.
16. To protect and enhance **soil / land quality** in Gloucestershire.
17. To protect and enhance **air quality** in Gloucestershire.
18. To protect and enhance **water quality** in Gloucestershire.
19. To reduce the adverse **impacts of lorry traffic** on the environment and communities through means such as:
 - a) reducing the need to travel
 - b) promoting more sustainable means of transport e.g. by rail or water
 - c) sensitive lorry routing
 - d) the use of sustainable alternative fuels
 - e) promoting the management of waste in one of the nearest appropriate installations.
20. To **reduce waste to landfill** and in dealing with all waste streams to actively **promote the waste hierarchy** (i.e. Prevent, Reduce, Reuse, Recycle, Recover, Dispose) to achieve the sustainable management of waste.
21. To reduce the global **use of primary materials** and minimise net energy balance requirements.
22. To reduce contributions to and to **adapt to Climate Change**.

2.6 **Table 2.3** sets out the “SEA topics” (listed in Annex 1 of the SEA Directive) and shows that they were all covered by at least one of the SA headline objectives for the Waste Core Strategy, although many of the SEA topics are cross-cutting issues that were covered by a number of the headline objectives.

Table 2.3 Coverage of SEA topics by SA Headline Objectives for the Gloucestershire Waste Core Strategy

SEA topic	Covered by SA Headline Objective
Biodiversity	8
Population	1, 2, 3, 4, 6, 14 and Original SA objectives 1 and 2
Human Health	1, 3, 11, 14, 15, 19
Fauna	8
Flora	8
Soil	15, 16
Water	14, 15, 18
Air	3, 15, 17, 19
Climatic Factors	15, 19, 20, 21, 22
Material Assets	5, 7, 11, 12, 20, 21 and Original SA objectives 1 and 2
Cultural Heritage	10, 11, 12, 13
Landscape	9, 10, 13

2.7 In addition to the use of the SA Framework to assess the potential effects of Waste Core Strategy objectives, options and policies as they were drafted, environmental and sustainability considerations were integrated into the Waste Core Strategy through close working between the SA team (both LUC and GCC staff) and the GCC officers drafting the plan.

3 How the Environmental/SA Report has been taken into account

- 3.1 As stated in the previous section, the SA was undertaken iteratively such that at each stage of the Waste Core Strategy's development, an assessment of the sustainability and environmental effects of the Waste Core Strategy was made. SA Reports were produced to describe the approach taken, the potential effects identified, and put forward recommendations to avoid or minimise negative effects or enhance positive effects. GCC officers preparing the Waste Core Strategy took the SA findings and recommendations into account while making changes to the Waste Core Strategy before each round of public consultation.
- 3.2 **Table 3.1** overleaf shows how preparation of the SA Reports (including the Environmental Report requirements) corresponded with each stage of the Waste Core Strategy preparation, and how any recommendations made were taken into account.

Table 3.1 Stages of Gloucestershire Waste Core Strategy preparation and corresponding SA stages, plus how the SA Report has been taken into account

Date	Plan-making stage	SA/SEA stage and how the SA Report was taken into account by GCC
2005-2006	<p>Evidence gathering and developing options</p> <p>Waste Core Strategy Issues and Options Parts A and B (Mar 2006)</p>	<p>SA Scoping Report (Aug 2005, Update 1 Nov 2005, Update 2 Apr 2006)</p> <p>Set out the baseline information, key issues and SA Framework to show the scope of the SA/SEA and how it would be undertaken.</p> <p>SA Report for the Waste Core Strategy Issues & Options (Jul 2006)</p> <p>This report included detailed appraisal matrices which tested the compatibility of the WCS aims and objectives against the SA objectives, as well as each of the WCS options against the SA objectives. The report set out a commentary of the sustainability strengths and weaknesses of the various options being considered in the preparation of the Waste Core Strategy. Some generic mitigation measures were also suggested but it was stated that more specific mitigation would be included in subsequent SA reports, as the policies became more specific.</p> <p>How the SA Report was taken into account:</p> <p>The SA process influenced the development of issues and options in terms of the following:</p> <ul style="list-style-type: none"> • Recommending that the original options within Issue W5: 'Setting out a spatial strategy' be reduced in number and simplified e.g. the term 'urban' was dropped for 'town' locations; • Recommending that the original options presented within Issue W8: 'Making an appropriate contribution to local, regional and national hazardous waste management requirements' should be simplified, as issues about the validity of the import and export of hazardous waste were confusing and not entirely relevant; • The original (proposed) vision was also amended as it was considered to be more of a statement of intent rather than a genuine vision.
2007-2008	<p>Waste Core Strategy Preferred Options (Jan 2008)</p>	<p>SA Report for the Waste Core Strategy Preferred Options (Jan 2008)</p> <p>This report included detailed appraisal matrices which tested the compatibility of the WCS aims and objectives against the SA objectives, as well as each of the WCS preferred options against the SA objectives. The report set out a commentary of the sustainability strengths and weaknesses of the preferred options. Some generic mitigation measures were suggested, but no specific recommendations for changing the preferred options were considered necessary.</p> <p>How the SA Report was taken into account:</p>

Date	Plan-making stage	SA/SEA stage and how the SA Report was taken into account by GCC
		<p>The 2008 SA Report for the WCS Preferred Options noted that "The SA of the Waste Core Strategy Issues & Options has already influenced the options that are presented as Preferred Options. This is detailed in the Waste Core Strategy Issues & Options SA Report and in Appendix 2 of this report. An early draft of the Preferred Options paper included a small number of policy options / approaches that (following SA scoring) were amended, dropped or added, as detailed in the table contained in Paragraph 5.3 'Other options considered and why these were rejected'."</p>
2008-2009	Strategic Waste Site Options (2009)	<p>SA Report (Stage 1) (Apr 2009)</p> <p>The 2009 Stage 1 SA Report set out the likely significant effects on the environment, and social and economic factors of the 106 potential waste site options considered for allocation as Strategic Waste Sites in the Waste Core Strategy. The method used by GCC for selecting the 106 'reasonable alternatives' was also outlined.</p> <p>A number of potential significant negative effects were identified during the SA, which mainly related to potential impacts on the environment during construction and operation of waste management facilities. However, the SA Report explained that a number of these effects may be mitigated by the implementation of robust development control policies, or when details are known at the planning application stage and the most appropriate mitigation measures can be identified. In addition, the requirement to meet Environmental Protection (EP)/Pollution Prevention Control (PPC) permitting standards that are regulated by the Environment Agency should ensure that design and operation of the waste facilities minimises any potentially significant effects. The EP/PPC standards cover emissions to air, land and water, energy efficiency, noise, vibration and heat and accident prevention.</p> <p>However, the majority of effects of developing new waste facilities on the potential waste sites were considered likely to be negligible or in many cases positive, due to the reduced volume of waste going to landfill and the associated efficiencies in resource use and sustainable economic development, along with opportunities for education, community participation and employment. In addition, the location of certain sites could help to reduce the severity of potential negative effects (e.g. on flooding, road transport and the loss of good quality soil and land).</p> <p>The 2009 Stage 1 SA Report recommended that in considering which of the 106 potential waste site options should be taken forward for allocation as a Strategic Waste Site, GCC should take into account the potential significant negative effects identified, and the following recommendations:</p> <ul style="list-style-type: none"> • Habitat loss should be avoided wherever possible, particularly if it is part of an internationally or nationally designated site of nature conservation importance such as a Special Protection Area (SPA), Special Area of Conservation (SAC), Ramsar wetland site or a Site of Special Scientific interest (SSSI). Site options where potential significant negative effects have been identified through the SA should not

Date	Plan-making stage	SA/SEA stage and how the SA Report was taken into account by GCC
		<p>be taken forward into the shorter list of sites included in the Waste Core Strategy for consultation. If they are, they should be subject to screening under the Habitats Regulations to determine whether a significant effect may occur on the integrity of the habitats and species for which a SAC, SPA or Ramsar is designated.</p> <ul style="list-style-type: none"> Similarly, potential waste site options in Flood Risk Zone 3 should be avoided. PPS25: Development and Flood Risk requires development applicants to carry out an assessment of flood risk and the runoff implications of their proposals. This could be incorporated into the Waste Core Strategy as a requirement of the planning application process for waste development proposals in areas of high risk of flooding. The flood risk assessment should: <ul style="list-style-type: none"> Identify how much of the site is in flood-plain and how much capacity would need to be replaced; and Demonstrate the likely impact of any displaced water on neighbouring or other locations which might be affected as a result of development. Sustainable drainage systems (SuDS) are key to ensuring that long-term flood risk is managed for all new waste facilities, but particularly those on sites in Flood Risk Zone 3. The incorporation of SuDS in the design and layout of waste management facilities and their circulation areas should help to reduce surface run-off and effects on land drainage in the locality. As such a large number of sites are within 250m of sensitive receptors it will be too difficult to rule out all of them from further consideration. Therefore, robust development control policies will need to be included within the Waste Core Strategy or Development Control Policies DPD and implemented at the planning application stage. Sites within the Cotswold AONB should be avoided unless a site-specific expert landscape assessment can be undertaken to prove that significant effects on the AONB are unlikely or could be mitigated. Similarly, due to the lack of information relating to the sensitivity of Landscape Character Areas within Gloucestershire, it is recommended that further expert assessment of potential landscape impacts are undertaken for any sites that make it into the shorter list for further consideration as Strategic Waste Site allocations.

Date	Plan-making stage	SA/SEA stage and how the SA Report was taken into account by GCC
		<p>How the SA Report was taken into account:</p> <p>The findings of the Stage 1 SA Report informed GCC's selection of the short list of 13 potential waste sites proposed for allocation in the WCS (along with other technical input and deliverability considerations). In addition, a separate landscape assessment for the waste sites was commissioned by GCC⁷.</p> <p>SA Report (Stage 2) (Sep 2009)</p> <p>The Stage 2 SA Report set out the likely significant effects of the four broad spatial options (centred on the designation of 'Zone C', which is an area running through the Central Severn Vale close to Gloucester and Cheltenham), as well as the short list of 13 waste site options proposed for allocation in the Waste Core Strategy. Similar to Stage 1, potentially significant negative effects were identified for four of the 13 site options against SA objectives 8 (biodiversity), 11 (material, cultural, and recreational assets), 14 (flooding) and 16 (soil and land quality).</p> <p>The Stage 2 SA Report therefore made the same recommendations as the Stage 1 Report (described above, except for the general landscape assessment recommendation) for GCC when considering which of the potential waste site options should be taken forward for allocation as a Strategic Waste Site. However, an additional recommendation was made in relation to one of the sites:</p> <ul style="list-style-type: none"> • The Foss Cross site within the Cotswold AONB should be avoided unless a site-specific expert landscape assessment can be undertaken to prove that significant effects on the AONB are unlikely or could be mitigated. <p>How the SA Report was taken into account:</p> <p>Following the Site Options Consultation four strategic site allocations were selected by GCC to be allocated in the Publication version of the WCS (that did not include the Foss Cross site). These sites were selected on the basis of the findings of the SA Reports Stage 1 and 2, plus the Site Options consultation document, as well as the responses received to that consultation and practical deliverability considerations.</p>
2010	Waste Core Strategy Publication version (December 2010)	<p>SA Report (Nov 2010)</p> <p>A new SA Report was prepared by LUC to appraise the likely significant effects on the environment, and the likely social and economic implications of the Vision, Strategic Objectives, 14 Core Policies and four strategic site allocations contained in the Publication version of the WCS. The SA concluded that in general, the Waste Core Strategy is considered likely to be a positive plan in sustainability terms and it is expected to result in positive impacts on the sustainability objectives, with relatively few negative effects having been</p>

⁷ Gloucestershire County Council Potential Waste Sites: Landscape and Visual Impact Assessment. Prepared by Atkins, 2009.

Date	Plan-making stage	SA/SEA stage and how the SA Report was taken into account by GCC
		<p>identified, none of which were significant. The generally robust development management policies (including the General Development Criteria for the strategic allocations in Appendix 5) within the plan should help to mitigate the potential adverse effects of waste management on areas such as health and amenity, biodiversity, landscape and flood risk; however the extent to which these policies can successfully deliver mitigation will also depend heavily on their appropriate implementation. Some recommendations for further mitigation within the policies were made in relation to potential negative effects on biodiversity and the potential for areas of habitat within or adjacent to waste sites to be lost as a result of development.</p> <p>The four strategic waste sites that have been allocated within the Waste Core Strategy are expected to result in a wide range of positive and significant positive sustainability effects; reflecting the thorough site selection process that has been undertaken and the findings of the previous appraisals of site options. Where negative impacts have been highlighted, none of which are significant, these generally relate to issues which were likely to be scored as negative for all or the vast majority of the site options that came forward during the site options consultation. In addition, the appropriate implementation of the development management policies within the Core Strategy should help to mitigate the potential adverse effects of the sites on particular SA objectives such as geodiversity and the potential for screening waste facilities.</p> <p>How the SA Report was taken into account:</p> <p>Following receipt and analysis of the consultation responses on the Publication version of the WCS, while it was the Council's view that none of the representations raised fundamental issues of soundness, the Council decided it would be beneficial to publish a revised version of the WCS incorporating a number of 'focused changes'. Natural England's consultation response to the Publication WCS recommended a change to policy WCS12, which strengthened the requirements with respect to biodiversity, and helped to address the SA recommendation as well. Focused change 34 added the following text to Policy WCS12 (Nature Conservation Biodiversity & Geodiversity), which : "Development proposals will be required to assess their impact on the natural environment and make a contribution to local nature conservation targets to ensure gain for net biodiversity."</p>
2011	Waste Core Strategy Submission (The Publication version was submitted to the Secretary of State for	<p>SA Report (Nov 2010) and SA Report Update (Jun 2011)</p> <p>An update to the SA Report was required prior to Submission to accompany the consultation on the Focused Changes to the Waste Core Strategy. However, as the Focused Changes did not raise fundamental issues of soundness or legal compliance, almost no changes were made to the SA effects identified in the Nov 2010 SA Report, and no new recommendations were made in the SA Update. Therefore, both the SA Report (Nov 2010) and the SA Report Update (June 2011) were submitted alongside the Waste Core Strategy for Examination.</p>

Date	Plan-making stage	SA/SEA stage and how the SA Report was taken into account by GCC
	Examination in Sept 2011, along with the revised version incorporating the Focused Changes)	
2012	Examination in Public hearings (Jan-Mar 2012) Waste Core Strategy Post-examination changes published for consultation (April 2012)	SA Addendum for Post-examination Changes (April 2012) , did not include any recommendations to make any further changes to the plan or policies.
	Insertion of Model Policy into Waste Core Strategy published for consultation (April 2012)	SA Addendum for Model Policy (April 2012) , did not include any recommendations to make any further changes to the plan or policies.
	Adoption of Waste Core Strategy (November 2012)	Final SA Report (comprises December 2010 SA Report, June 2011 SA Update, April 2012 SA Addendums) did not include any recommendations to make any further changes to the plan or policies.

4 How opinions of consultation bodies and the public have been taken into account

- 4.1 At each stage of the Waste Core Strategy development, a SA Report was published alongside the Waste Core Strategy document, for consultation with the public and the consultation bodies specifically relating to the SEA Directive (i.e. English Heritage, Environment Agency and Natural England). The SEA Regulations require the SEA Adoption Statement to summarise how any opinions expressed by the public and the consultation bodies about the SEA have been taken into account.
- 4.2 The Waste Core Strategy consultation stages and consultation responses received relating to the SA Reports are summarised below. Note that while the statutory consultation bodies for the SEA were consulted by GCC, they may not have commented directly on the SA Report at each stage.

Issues and Options 2005-2006

Scoping Report

- 4.3 Consultation on the initial stages of the SA i.e. the Context Report and the Scoping Report was carried out for 5 weeks from 25th August to the 29th September 2005. 48 consultees were sent copies of the reports, including internal consultees within the County Council, and 12 responses were received, the majority being reasonably supportive, providing constructive comments and additional baseline data. The reports were also made available on the County Council's website, for information purposes, and as a result, two groups (Forest of Dean Friends of the Earth and Friends of the Forest), who were not on the original consultation list, made representations which were considered. Amendments were made to the initial Context and Scoping Reports to address the consultees' comments, and a Response Report was produced and sent to all those who had made comments. The revised Context and Scoping Reports (November 2005) as well as the Response Report were then placed on the County Council's website.
- 4.4 Following the publication of Office of the Deputy Prime Minister guidance on SA (November 2005) and a review of the process by Levett-Therivel consultants, (also in November 2005), further amendments and additions were made to the baseline data contained in the reports. Update 2 of the Context and Scoping Report were published and place on the Council's website in April 2006. A letter was sent to all the consultees who had received the original reports informing them that the update was available.

SA Report for the Waste Core Strategy Issues and Options

- 4.5 An SA Report on the Waste Core Strategy Issues & Options Paper went out to consultation alongside the Issues & Options Paper for a period of eight weeks ending on the 15th September 2006. A Sustainability Appraisal Consultation Response report was produced and made available on GCC's website, which set out all the responses made specifically on the Issues & Options SA Report (but not how they had been dealt with – see below).

Council's response to consultation comments

- 4.6 The consultation responses were dealt with in the subsequent SA Report (January 2008) for the Waste Core Strategy Preferred Options, and a table summarising the comments and explaining how each response had been addressed was included in Section 1.2 of the Preferred Options SA Report.
- 4.7 Ten organisations or individuals commented on the Issues & Options SA Report, with the Environment Agency, Woodchester Parish Council and the County Council's Ecologist and Waste Management Unit supporting the approach taken. These comments were noted. However, the County Ecologist queried whether work done by GCC on meeting the Habitats Regulations had also been incorporated, and the summary table explained that this was reported on separately from the SA Report.

4.8 Two individuals commented on wider waste management issues such as increasing recycling and the need to find alternative landfill sites in the Severn Vale, and the summary table noted that these were being addressed by the WCS. One individual considered that the work and resources involved in the SA had not “added much to the main problem or solved it”. The Council’s response was that the SA process is time and resource ‘hungry’ but it does add value and is a key element of plan making under national planning legislation (the Planning & Compulsory Purchase Act 2004). The Stroud District Green Party considered that the SA should emphasise more strongly that landfill is unsustainable, and also made a specific comment on the scoring of one of the options for Issue W10. The SA summary table confirmed that the whole thrust of the WCS is to move waste management up the hierarchy of management methods, away from landfill, and accepted the comment on the scoring. The Campaign to Protect Rural England commented that the WCS needed to conform with national waste policy, and the summary table confirmed that it had.

4.9 Finally, the Government Office for the South West (GOSW) provided some specific comments relating to the level of detail in the SA and how it had been undertaken. The summary table notes how GCC officers subsequently met with GOSW officers in November 2006 to discuss their comments in more detail and agree the approach that should be taken for the SA in subsequent iterations.

Preferred Options 2007-2008

4.10 Consultation on the SA Report for the WCS Preferred Options took place between January and March 2008. The responses relating to the SA Report were summarised and discussed within the wider “Waste Core Strategy Preferred Options Consultation Report” (GCC, Summer 2008).

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

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

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

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

Council’s response to consultation comments

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

4.16 Grundon’s comments on landfill were addressed through the WPA response to similar consultation responses made in relation to the Vision and Strategic Objectives for the WCS.”

Strategic Waste Site Options 2009

4.17 Consultation on site options for the Gloucestershire Waste Core Strategy took place over an 8-week period between 5th October and 30th November 2009. The Stage 1 and Stage 2 SA Reports were also made available for consultation during that period. The purpose of the consultation was to obtain stakeholder views on 13 short-listed sites identified as potential strategic locations for residual waste recovery (treatment). The consultation asked 20 questions relating to the principle of focusing the search for strategic waste sites primarily in 'Zone C', how the sites were identified, the suitability of the sites etc. as well as inviting comments on some of the supporting documents, including the SA report. The consultation responses, including those specifically on the SA, were summarised and analysed within the "Gloucestershire Waste Core Strategy Report of Site Options Consultation 5th October-30th November 2009" (GCC, 2009).

4.18 Question 19 asked; '*Do you have any general comments on the accompanying Sustainability Appraisal (SA) Reports?*'. This question related to the Stage 1 and Stage 2 SA Reports for the Strategic Waste Site Options prepared by LUC in April and September 2009 respectively.

4.19 A total of 94 people/organisations responded to this question. Around 60 stated 'no' or 'don't know'. From the remainder, the following issues were raised:

Positive Comments

- Spells out the needs very well.
- Comprehensive and thorough.
- Key issue – needs to be dealt with quickly.
- Summary table easy to read.
- Conclusions and recommendations set out well as is monitoring of effects.
- Covers most issues concerning the feasibility of sites.
- Agree with headline sustainability objectives.

Negative Comments

- Table 3 is indecipherable to a lay person – cannot be called a 'non-technical' summary.
- Tables in Stage 2 report are clearer but objectives could have been named in the actual tables.
- Question reliability of the data upon which the assessments are made.
- Worrying that the information provided in relation to Combined Heat and Power (CHP) is so sparse.
- Sites with time limited permissions and restoration conditions should be considered as Greenfield in the assessment, even before they have been restored.

Neutral/General Comments

- Although the report concedes there will be traffic problems at Wingmoor Farm there is no discussion of potential solutions.
- Focus must be on minimising waste through better education.
- Good work but based on generic assessment only – will vary depending on technology.

Council's response to the consultation comments

4.20 The Gloucestershire Waste Core Strategy Report of Site Options Consultation 5th October-30th November 2009 report stated:

"The comments received in relation to the various site options Sustainability Appraisal (SA) reports are noted. The reports have been prepared by independent consultants in line with established guidance and best practice.

With regard to complexity and ease of understanding, the non-technical summaries are as brief and simply worded as possible. It is the case however that the reports relate to technical subject matter.

The issue of technology is dealt with in broad terms as the site options consultation was based on each site being capable of accommodating a range of different technologies. This approach is consistent with national policy which emphasises that local authorities should avoid any detailed prescription of waste management techniques or technology that would stifle innovation in line with the waste hierarchy.

The publication WCS is supported by a final Sustainability Appraisal (SA) Report prepared by independent consultants."

Publication 2009-2011

4.21 The November 2010 SA Report was published alongside the Publication version of the Waste Core Strategy for consultation on its 'soundness' over a 6-week period between 13th December 2010 and 7th February 2011. GCC prepared a "Statement of Publication Representations & Key Issues" (September 2011) setting out how the publication consultation had been undertaken, the numbers of responses received and the key issues raised.

4.22 The Environment Agency had no objections to the SA Report. English Heritage did not refer to the SA Report in their response to the Publication WCS. Natural England made the following comments relating to the November 2010 SA Report:

- Natural England has attempted to consider the SA but without the consideration of the 14 saved policies within the SA, consider the whole process to be flawed and have therefore to return to the whole document. To submit something at this time Natural England can only advise that, within its limited context it is a well written document, but that cannot consider the sustainability of the WCS to have been adequately assessed. Natural England will be submitting further comment after the submission date.

Council's response to consultation comments

4.23 The comment from Natural England was dealt with in the Publication Response Schedule (CD6.1, page 330). The GCC response was:

"It is assumed that the respondent is referring to the saved policies from the Waste Local Plan (although in fact there are more than 14 of these). The SA report addresses only the Core Policies within the WCS, it does not address the Local Plan policies which have already been subject to Strategic Environmental Assessment (SEA) and have been formally adopted.

Importantly, there is nothing in national policy or best practice to suggest that saved local plan policies should be subject to 're-appraisal' through Sustainability Appraisal (SA). If any of the saved policies are taken forward into subsequent Development Plan Documents (DPDs) they will be subject to SA and stakeholder consultation and refined as necessary.

It is not accepted that the SA process is flawed. The purpose of the SA is to test the sustainability of the WCS not the adopted Local Plan. It has been prepared by independent consultants in accordance with established best practice and is considered to be adequate."

Focused changes consultation 2011

4.24 Following receipt and analysis of the consultation responses on the Publication version of the WCS, while it was the Council's view that none of the representations raised fundamental issues of soundness, the Council decided it would be beneficial to publish a revised version of the WCS incorporating a number of 'focused changes'. Further comments on the 'focused changes' were invited over the 6-week period 27th June – 8th August 2011. The June 2011 SA Report Update was also made available for consultation during this period. The results of the focused changes consultation were also included in the "Statement of Publication Representations & Key Issues" (September 2011). The statutory environmental consultees did not make any comments on the SA Report Update.

Submission 2011

4.25 The November 2010 SA Report and the Publication version of the Waste Core Strategy (December 2010) were submitted to the Secretary of State for examination in September 2011, along with the Revised Waste Core Strategy showing the Focused Changes and the June 2011 SA Report Update relating to the Focused Changes.

Examination 2011-2012

4.26 The Sustainability Appraisal was considered under Issue 1 (Legal requirements, evidence base & relationship to plans and strategies), identified by the Planning Inspector for discussion at the Examination in Public Hearing Sessions. Representors to the Waste Core Strategy submitted Statements to the Examination prior to the Hearing Sessions, none of which related wholly to the Sustainability Appraisal, although the Inspector did put a few questions to GCC that referred to the SA.

Post-examination changes

4.27 Post-examination changes were made to the WCS, and these were subject to the SA as presented in the two SA Addendums prepared in April 2012. However, neither of these made any recommendations for further changes to the WCS. Natural England supported the proposed Main Modifications and Additional Changes and had no objections to the WCS on grounds of soundness or legal compliance. English Heritage confirmed acceptance and support of the new Policy WCS 12a (on historic assets). The Environment Agency stated: "We note and welcome the Main Modifications and Additional Changes made to the document. They are as expected from the discussions at the Examination in Public. We welcome the further clarity they provide within the document and have no detailed comments to make and no objections to the changes."

Inspector's Report

4.28 The Inspector's Report (August 2012) makes very little mention of the SA, apart from to state that "*it has been carried out and is adequate*", and this helps the Inspector to conclude that the WCS is legally compliant.

5 Why the adopted Waste Core Strategy was chosen in light of reasonable alternatives

5.1 Chapter 2 of the 2010 SA Report describes how reasonable alternatives for all of the options and policies within the Waste Core Strategy have been dealt with at each stage of the preparation of the plan and the SA. In summary:

Issues and Options 2005-2006

5.2 A number of options (including the 'business as usual' option, i.e. continue with the approach in the Adopted Waste Local Plan) were considered for each of the following key issues in the WCS Issues & Options Paper (there was also a W11 regarding the SA and W12 regarding 'any other issues'):

- W1. Setting an appropriate spatial vision and objectives for the WCS;
- W2. Determining the time period over which the WCS operates;
- W3. Implementing the waste hierarchy – reducing the amount of all types of waste we produce, but where waste does arise to increase recycling and divert it from landfill;
- W4. Adopting a strategy for making appropriate provision for waste management facilities;
- W5. Setting out a spatial strategy – selecting criteria to use for identifying suitable sites for waste management operations;
- W6. Implementing the Joint Municipal Waste Management Strategy for Gloucestershire's household waste;
- W7. Determining what factors should be used in assessing the cumulative impact on local communities;
- W8. Making an appropriate contribution to local, regional and national hazardous waste management requirements;
- W9. The appropriateness of proposals for new waste management facilities in the Green Belt;
- W10. Policies for dealing with proposals for new waste management facilities in other nationally designated areas;

5.3 Rather than setting out specific options, a series of questions were posed for consultees on the standard response form in relation to the issues above. For the spatial strategy, the questions were as follows:

- Do you think it is most appropriate to locate waste management facilities in towns, in rural areas, or somewhere in between?
- In addition to the choice between town and rural locations for facilities there is also the potential for a centralised (large scale strategic) or decentralised (small scale local) pattern. Consultees were asked to place a tick in the table where they thought it was preferable to have centralised or dispersed facilities for seven different types of waste management facility.
- Should the WCS identify sites for more landfill capacity towards the end of the WCS period (see issue 2) by a. Planning for full expected capacity; b. Making limited provision; or Not making any specific provision?
- If additional landfill void space has to be found, what criteria should be used for finding suitable sites for landfilling residual waste?
- A number of matters were referred to as important criteria in finding suitable sites for waste management activities of all types. Consultees were asked to rank the ones they felt are most important from 1 to 5 (where 1 is the most important).

5.4 The July 2006 SA Report for the Issues & Options set out a commentary of the sustainability strengths and weaknesses of the options for each of these key issues, including stating for some of the issues which options were the 'most positive', or were the 'least favoured'. Some generic mitigation measures were also suggested but it was stated that more specific mitigation would be included in subsequent SA reports, as the policies became more specific. No specific recommendations were made regarding which preferred options to select. However, the sustainability strengths and weaknesses of the options were taken into account by GCC when deciding on the Preferred Options for the Waste Core Strategy.

5.5 As stated in Table 3.1 of this Adoption Statement, the SA influenced the development of issues and options in terms of the following:

- Recommending that the original options within Issue W5: 'Setting out a spatial strategy' be reduced in number and simplified e.g. the term 'urban' was dropped for 'town' locations;
- Recommending that the original options presented within Issue W8: 'Making an appropriate contribution to local, regional and national hazardous waste management requirements' should be simplified, as issues about the validity of the import and export of hazardous waste were confusing and not entirely relevant;
- The original (proposed) vision was also amended as it was considered to be more of a statement of intent rather than a genuine vision.

Preferred Options 2007-2008

5.6 The Preferred Options WCS (January 2008) included a preferred option for the Vision, and a preferred option setting out five Strategic Objectives for the WCS covering:

- A. Waste reduction.
- B. Re-use, Recycling, Composting and Recovery.
- C. Preserving environmental quality and avoiding adverse effects on the environment.
- D. Reducing the environmental impacts of transporting waste.
- E. Co-location of similar facilities with existing facilities or on previously developed land in preference to undesignated greenfield sites.

5.7 However, 33 'preferred policy options' were set out, grouped into three topics (Waste Minimisation covering Strategic Objective A, Recycling and Composting, Recovery covering Strategic Objective B and Locational Strategy covering Strategic Objectives C-E), which included more than one preferred option for the same issue in many cases e.g. four policy options (WPO4a-d) for the provision of waste facilities, two policy options proposed to encourage markets for recyclable materials (WPO5a-b) and four options in terms of broad locational search areas for strategic waste management facilities (WPO7a-d)). Therefore, while the Preferred Options WCS narrowed down the options considered at Issues and Options stage to include those options considered to be preferable and deliverable, it did not present a final draft version of the WCS, and further decisions were needed at the following stage to determine the preferred policy approach to include in the WCS (see below).

5.8 Technical Evidence Papers A-Q were prepared by GCC in 2007 to describe how the preferred options were developed, and included reasons such as addressing stakeholder consultation responses from the Issues & Options stage, reference to evidence, rationalisation of the larger number of options at the previous stage. In addition, an early iteration of the SA on an early draft of the Preferred Options paper resulted in a small number of policy options / approaches being amended, dropped or added (as set out in Section 5.3 of the 2008 SA Report). For example, the three policy options for sewage treatment were rationalised into two policy options, an option on protecting regional and locally important landscapes was dropped as it was not considered to be a strategic level issue for the Waste Core Strategy and that only nationally designated landscapes would be considered, with the regional and local landscapes addressed in a Development Management Policies DPD. Policy options for protection of nationally important archaeology and nature conservation sites were added.

5.9 The four preferred spatial strategy options for the WCS (WPO7a-d) were:

- Strategic waste management facilities should be considered within a broad Area of Search 16km around Main Urban Areas. Under this approach, strategic sites that are remote from arisings could be appropriate if they are able to demonstrate sustainable transport linkages
- Use urban locations and the area labelled Zone C as the broad locational area in which strategic waste management facilities should be sited.
- Use urban locations and areas labelled C2, C3 and C4 as the broad locational area in which strategic waste management facilities should be sited. (Zone C was divided from north to south into segments labelled C1 at Tewkesbury to C5 at Stroud.)
- Use area C4 as the broad locational area for strategic waste management facilities. If land is not forthcoming then the fall-back position is to search in areas C2 and C3 and then the wider Zone C.

Strategic Waste Site Options 2009

5.10 As an outcome of the Preferred Options consultation and in particular following strong advice from the Government Office for the South West, it was decided that the WCS would now include strategic sites suitable for the treatment of residual municipal waste. Therefore, GCC did more work to assess a long list of potential sites (106) and produced a new consultation document ("Waste Core Strategy Site Options Consultation", October 2009).

5.11 This report explained that during the Preferred Options consultation in 2008, several options for where new waste facilities might be located were put forward, based on locating sites fairly close (within 16km) to the County's main urban areas. One of the options defined a more specific zone running through the Central Severn Vale close to Gloucester and Cheltenham, defined as 'Zone C'. Some support was expressed by consultees during the Preferred Options consultation for each option but a decision needed to be made about the locational strategy. Therefore, the Site Options Consultation report set out the Council's preferred locational strategy, which was to focus the search for strategic sites primarily on the area defined as Zone C.

5.12 The report also set out the reasons why GCC considered focusing on Zone C to be the most appropriate approach:

- It is consistent with government policy (PPS10) which states that local authorities should prepare planning strategies that 'enable waste to be disposed of in one of the nearest appropriate installations';
- It is consistent with the Regional Waste Strategy, 'From Rubbish to Resource', which states that waste should be disposed of as close to possible where it is produced;
- It is consistent with the Draft South West Regional Spatial Strategy (RSS) Waste Policy W2 which covers the locations and distribution of waste facilities;
- Major growth is planned at Gloucester and Cheltenham through the draft RSS (2008) which, if it goes ahead will significantly increase the amount of waste produced there over the next 20 years; and
- Zone C avoids the floodplain and AONB and is thus relatively unconstrained in land use planning terms.

5.13 It then included four new potential spatial options for the distribution of the waste sites, centred on Zone C:

- Focus strategic sites within Zone C;
- Allocate sites outside of Zone C for smaller-scale facilities/transfer;
- Incorporate waste treatment into the urban extensions to Cheltenham and Gloucester proposed under the RSS; or
- A combination of the above options.

5.14 Finally, the report included 10 specific sites within Zone C that GCC considered suitable for residual municipal waste treatment but could if necessary be used for the treatment of other waste (e.g. commercial and industrial waste). They might also be suitable for the provision of supporting infrastructure such as waste transfer facilities. In addition, the report identified three

sites outside Zone C, to ensure an appropriate degree of flexibility, to reflect the fact that sites don't always come forward as expected and to ensure adequate provision is made for any additional facilities that may be needed to support the Zone C sites. These sites focused on land that is outside Zone C but still within 16km of Gloucester and Cheltenham and also land within 500m of the RSS named settlements (Cinderford, Cirencester, Coleford, Lydney, Stroud and Tewkesbury).

5.15 The Stage 1 and Stage 2 SA Reports prepared in 2009 appraised the long list of 106 potential waste sites (Stage 1), and the short list of 13 waste sites identified in the Site Options Consultation Report as well as the four new spatial options for the distribution of the waste sites (Stage 2).

5.16 As set out in **Table 3.1** above, the findings of the Stage 1 SA Report informed GCC's selection of the short list of 13 potential waste sites proposed for allocation in the WCS (along with other technical input and deliverability considerations). Similarly, the SA findings from Stage 2 informed GCC's selection of the four sites allocated in the Publication version of the WCS, along with the responses received to the Site Options consultation and practical deliverability considerations.

Publication 2009-2011

5.17 The wider consultation responses from the Preferred Options and Site Options consultation stages were taken into account as well as the SA Reports and the publication version of the Waste Core Strategy was produced. The 2008 Preferred Options SA Report did not include any recommendations for the WCS policies, but the recommendations made in the 2009 Stage 1 and Stage 2 SA Reports regarding site options did help to inform the selection of the strategic site allocations.

5.18 The publication version of the WCS set out ten key issues facing Gloucestershire that the WCS must address, and based on these drivers, an overarching Vision for waste management within the county, followed by five strategic objectives:

- Reduction
- Re-Use, Recycling and Composting
- Other Recovery (including Energy Recovery)
- Disposal
- Minimising Impact

5.19 The strategic objectives generally covered the previous five objectives proposed in the Preferred Options WCS, but sought to reflect the waste hierarchy. The WCS then set out the 'spatial strategy' for achieving the Vision in Section 4, which is aligned with the five strategic objectives. GCC explains that it is important for the WCS to be sufficiently flexible, identifying a range of suitable sites within the context of an overall, preferred locational strategy. GCC's proposed approach is to focus all permanent 'strategic' waste management facilities (>50,000 tonnes/year) including residual waste recovery facilities, within the central area of Gloucestershire, close to the main urban areas along the M5 corridor in particular Gloucester and Cheltenham, defined as 'Zone C'.

5.20 Section 4 includes 14 Core Policies that help to implement the spatial strategy:

- WCS1: Waste Reduction
- WCS2: Recycling & Composting/Anaerobic Digestion (including Bulking and Transfer)
- WCS3: Inert Waste Recycling & Recovery
- WCS4: Other Recovery (including Energy Recovery)
- WCS5: Waste Water
- WCS6: Hazardous Waste
- WCS7: Cumulative Impact
- WCS8: Safeguarding Sites for Waste Management

- WCS9: Flood Risk
- WCS10: Green Belt
- WCS11: Areas of Outstanding Natural Beauty
- WCS12: Nature Conservation (Biodiversity & Geodiversity)
- WCS13: Design
- WCS14: Sustainable Transport

5.21 Four strategic site allocations (all in Zone C) were incorporated into policy WCS4 'Other Recovery (including energy recovery)', and were selected on the basis of the findings of the SA of the Site Options consultation document, as well as the responses received to that consultation and practical deliverability considerations.

5.22 The Publication WCS repeated the reasons for selecting Zone C that were set out in the Site Options Consultation (see para. 5.12 above), but added:

"It is also the case that Zone C received a good level of support during previous consultation on the WCS. Those that did not support Zone C were generally in favour of a more 'dispersed' approach with provision being made on small-scale facilities (<50,000 tonnes per annum) located across the whole county. There was however little support from the waste industry for such an approach which brings into question how deliverable this approach would be in practice.

Notably, our proposed approach (see Core Policy WCS4 below) whilst focusing strategic facilities into Zone C would still allow for smaller-scale facilities to come forward outside Zone C, subject to meeting policy criteria, if there were to be sufficient demand from the waste industry."

5.23 The November 2010 SA Report for the Publication WCS appraised the Vision, Strategic Objectives and 14 Core Policies, including the four strategic site allocations for the different generic types of waste facilities that could be developed on them.

Focused changes consultation 2011

5.24 Following receipt and analysis of the consultation responses on the Publication version of the WCS, while it was the Council's view that none of the representations raised fundamental issues of soundness, the Council decided it would be beneficial to publish a number of 'focused changes' amending some of the policies of the WCS. The Schedule of Focused Changes explains why each change was made, referring to particular consultees and their concerns that were being addressed.

5.25 The June 2011 SA Report Update was also made available for consultation during this period, but did not make any recommendations for the Focused Changes.

Submission 2011

5.26 The November 2010 SA Report and the Publication version of the Waste Core Strategy (December 2010) were submitted unchanged to the Secretary of State for examination in September 2011. The submission documents also included a schedule of showing the Focused Changes and the June 2011 SA Report Update relating to the Focused Changes.

Examination 2011-2012

5.27 Following the Examination in Public for the WCS (hearings held in January-February 2012), Gloucestershire County Council has proposed a number of changes to the WCS which result from the Examination process, and need to be made in order for the WCS to be found 'sound' by the Inspector.

5.28 These changes were referred to as "Main Modifications" in line with s20(7C) of the 2004 Act (as amended), and comprise a mixture of amendments to the Vision, Objectives, some Policies and changes to the Strategic Site Schedules in Appendix 5. Many of the Main Modifications were already included in the Focused Changes consultation, and assessed in the SA Report Update (June 2011). However, a number of the Main Modifications were new as they arose from the debates held during the Examination, and some supersede the earlier Focused Changes. A

number of 'Additional Modifications' were also proposed which were largely minor/editorial in nature and do not go to the 'soundness' of the WCS.

5.29 The main changes that had not previously been appraised were that two of the strategic site boundaries changed, while one of the sites was divided into two, plus three new policies were proposed for inclusion in the WCS:

- WCS0 – the new Government recommended policy on Presumption in Favour of Sustainable Development.
- WCS6a Landfill.
- WCS12a Historic Environment.

5.30 All of the Main Modifications were subject to the SA as presented in the two SA Addendums prepared in April 2012. However, neither of these made any recommendations for further changes to the WCS. Natural England supported the proposed Main Modifications and Additional Modifications and has no objections to the Waste Core Strategy on grounds of soundness or legal compliance.

Adopted Waste Core Strategy (2012)

5.31 The spatial strategy in the Adopted Waste Core Strategy still focuses on delivering the strategic waste management facilities required in the central Zone C. The Inspector's Report refers to the SA process as helping to provide the evidence and justification for the identification of the spatial strategy option of Zone C as the area within which strategic sites should be located.

6 How will the environmental and sustainability effects be monitored?

6.1 The SEA Regulations require that "*The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action*" (Regulation 17), and that the environmental report should provide information on "*a description of the measures envisaged concerning monitoring*" (Schedule 2).

6.2 The Government's SA Guidance (hosted on the Planning Advisory Service website) states that details of the proposals for monitoring the significant effects of implementing the adopted development plan document should be included in the sustainability appraisal report, and confirmed when the plan is adopted. Chapter 5 of the 2010 SA Report included proposals for how the potential significant effects identified for the Waste Core Strategy Publication version could be monitored as part of monitoring the Waste Core Strategy itself, i.e. by incorporating the sustainability monitoring within the annual monitoring process for the WCS, and making use of any relevant indicators from the WCS.

6.3 As the Waste Core Strategy monitoring targets and indicators were revised in the Post-examination Changes published for consultation following the Examination in Public (during April-June 2012), the way in which those targets and indicators could also be used to monitor potential significant sustainability effects was reviewed within the first April 2012 SA Addendum.

6.4 The SA Monitoring Framework was updated to reflect the changes to the WCS Monitoring Framework (and the effects identified for the new policies). **Table 6.1** shows the likely significant positive effects of the WCS that were identified through the November 2010 SA Report, the SA Report Update (June 2011) and the April 2012 SA Addendums (note that no significant negative effects were identified). The second column shows indicators that could be used by GCC to monitor the potential significant sustainability effects of the WCS, including any relevant indicators that are already included in the Adopted WCS Monitoring Framework.

Table 6.1 SA Monitoring Framework for the significant positive sustainability effects for the Gloucestershire Waste Core Strategy

What needs to be monitored? (i.e. is the WCS having a significant positive effect on...)	What indicator could be used to monitor the potential significant effect?
Protecting the health and wellbeing of local communities (SA objective 1)	<ul style="list-style-type: none">The number and percentage of proposals where cumulative impact was cited as a reason for refusal
Maximising the opportunities for education and public participation in waste management (SA objective 2)	<ul style="list-style-type: none">The number of education/promotional visits/exhibitions carried out per annum.The number of waste facilities incorporating education centres etc.
Safeguarding levels of amenity within Gloucestershire (SA objective 3)	<ul style="list-style-type: none">The number and percentage of proposals where cumulative impact was cited as a reason for refusal
Promoting sustainable economic development in Gloucestershire (SA objective 4).	<ul style="list-style-type: none">The number of waste related planning applications refused per annum where issues related to unsustainability were cited as part of the reasons for refusal

What needs to be monitored? (i.e. is the WCS having a significant positive effect on...)	What indicator could be used to monitor the potential significant effect?
	<ul style="list-style-type: none"> Achievement of housing and employment provision targets established through LDF process
Protecting, conserving and enhancing biodiversity (SA objective 8)	<ul style="list-style-type: none"> The number of waste related planning permissions granted in an area of with features of national or local nature conservation importance The number of waste related planning applications refused per annum where nature conservation issues were cited as part of the reasons for refusal
Conserving the quality of the landscape (SA objective 9)	<ul style="list-style-type: none"> Total extent of the Gloucester/Cheltenham Green Belt (hectares) The number of waste related planning permissions granted in the Green Belt/an AONB per annum The number of waste related planning permissions refused per annum where Green Belt/AONB issues were cited as part of the reasons for refusal
Maximising the opportunities available for screening waste sites and/or incorporating innovative design (SA objective 10)	<ul style="list-style-type: none"> The number of waste management planning applications submitted with a design and access statement. Number and % of proposals where design was cited as a reason for refusal.
Protecting Gloucestershire's material, cultural and recreational assets (SA objective 11)	<ul style="list-style-type: none"> Percentage of planning permissions that either maintain, provide for or enhance Public Rights of Way.
Protecting townscapes and built heritage assets (SA objective 13)	<ul style="list-style-type: none"> Number and % of proposals where impact on the Historic Environment is cited as a reason for refusal. Number of planning applications within 100m of a historic asset
Minimising the risk of flooding (SA objective 14)	<ul style="list-style-type: none"> The number and percentage of waste sites incorporating sustainable drainage measures per annum The number and percentage of waste permissions located upon designated floodplain land per annum The number and percentage of waste refusals where the floodplain and safeguarding water supplies acted as part of the reason for the refusal per annum
Preventing pollution (SA objective 15)	<ul style="list-style-type: none"> Number of pollution/contaminated land incidents related to waste

What needs to be monitored? (i.e. is the WCS having a significant positive effect on...)	What indicator could be used to monitor the potential significant effect?
	<ul style="list-style-type: none"> Levels of key air pollutants
Conserving water quality (SA objective 18)	<ul style="list-style-type: none"> Total number of waste water treatment facilities in Gloucestershire The number of new or expanded waste water treatment facilities permitted per year The number and percentage of waste refusals where the floodplain and safeguarding water supplies acted as part of the reason for the refusal per annum
Reducing the impacts of lorry traffic associated with the transportation of waste (SA objective 19)	<ul style="list-style-type: none"> The number and percentage of waste related developments using non-road means of transport (rail, water) The number and percentage of waste related planning applications supported by a Travel Plans The number and percentage of waste related planning applications supported by a Transport Assessment The number of Section 106 agreements relating to transport entered into per annum The number and percentage of all waste refusals per annum, where highways was cited as the reason for refusal The number of applications where the 'county's needs' was used as a refusal reason
Encouraging the movement of waste up the waste hierarchy (SA objective 20)	<ul style="list-style-type: none"> The number of 'major development' applications that include a Waste Minimisation Statement The number of planning applications refused on the basis of Policy WCS2 (Waste Reduction). The total available recycling/composting capacity The number of new/expanded recycling and composting facilities permitted per year The number of recyclates 're-processing' facilities in Gloucestershire The total available bulking and transfer capacity The number of new/expanded bulking and transfer facilities permitted per year The number of proposals for permanent/temporary inert recycling and recovery facilities permitted per year The total available AD capacity (and total available AD capacity for agricultural waste and

What needs to be monitored? (i.e. is the WCS having a significant positive effect on...)	What indicator could be used to monitor the potential significant effect?
	<p>sewage sludge respectively)</p> <ul style="list-style-type: none"> • The number of new/expanded AD facilities permitted per year • The total amount of residual waste recovery capacity for MSW and C&I waste • The total amount and percentage of C&I waste and MSW 'treated' through 'other recovery' waste management processes per year • The total amount of landfill capacity • The number of landfill applications permitted • Percentage of hazardous waste managed in Gloucestershire sent to landfill versus that which is recovered including recycling.
Minimising the use of primary materials (SA objective 21)	<ul style="list-style-type: none"> • The number of new developments involving the use of recycled aggregates • The number of 'major development' applications that include a Waste Minimisation Statement • Total amount of waste arising in Gloucestershire • Percentage of C&D waste transferred for recycling, reprocessing, for use in land reclamation and landscaping or sent for disposal to landfill. • Number of proposals for permanent inert recycling and recovery facilities permitted per year. • Number of proposals for temporary inert recycling and recovery facilities permitted per year. • Number of 'strategic' scale permanent inert recycling and recovery facilities permitted outside 'Zone C' per year.
Adapting to, or mitigating the effects of, climate change (SA objective 22)	<ul style="list-style-type: none"> • The installed capacity of new renewable energy systems • The percentage of renewable energy sourced from the by-products of waste management • Energy capacity in mega watts from renewable energy facilities associated with waste water treatment in Gloucestershire and the percentage this represents of total renewable energy capacity in Gloucestershire
Promoting sustainable development and sustainable communities in Gloucestershire (Original SA objective 1)	<ul style="list-style-type: none"> • The number of waste related planning applications refused per annum where issues related to unsustainability were cited as part of the reasons for refusal

What needs to be monitored? (i.e. is the WCS having a significant positive effect on...)	What indicator could be used to monitor the potential significant effect?
Safeguarding sites for waste management facilities (Original SA objective 2)	<ul style="list-style-type: none"> The number and percentage of non-waste developments permitted on existing waste management sites/proposed (allocated) waste sites The number and percentage of proposals where impact on an existing or proposed waste management facility was cited as a reason for refusal

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