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Gloucestershire Waste  
Core Strategy (WCS)

Soundness Self  
Assessment

September 2011

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## 1. Introduction

- 1.1 This document has been prepared in support of the Gloucestershire Waste Core Strategy (WCS) which was formally submitted to the Secretary of State for Communities and Local Government on 5th September 2011 in accordance with Regulation 30 of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008.
- 1.2 Having been formally submitted to the Secretary of State, the WCS will now be considered by an independent Planning Inspector at a public examination. This is likely to take place in November or December 2011 depending on whether a pre-examination meeting is needed.
- 1.3 The role of the Planning Inspector will be to consider two main issues:
  - Whether the WCS is 'legally compliant'; and
  - Whether the WCS is 'sound'
- 1.4 To be considered '**legally compliant**' the WCS must have been prepared having regard to due process. In other words it has been prepared in accordance with the Council's development scheme, statement of community involvement and national planning regulations, has been subjected to a sustainability appraisal (SA) has regard to national policy and the sustainable community strategy and conforms with regional policy.
- 1.5 The Planning Inspector will determine whether these requirements have been met through the examination process. To assist the Inspector in reaching a decision, the Council has completed a 'legal compliance' self-assessment which has been submitted as part of the package of WCS documents and is available separately.
- 1.6 To be considered '**sound**' the WCS must be judged to be:
  - **Justified** (i.e. founded on a robust and credible evidence base and the most appropriate strategy when considered against reasonable alternatives)
  - **Effective** (i.e. deliverable, flexible and able to be monitored); and
  - **Consistent** (i.e. consistent with national policy)
- 1.7 The Planning Inspector will determine through the examination process, whether the WCS is sound. This 'soundness' self-assessment has been prepared to assist the Inspector in making that decision and has been submitted alongside the legal compliance self-assessment as part of the package of WCS submission documents.

1.8 Table 1 overleaf demonstrates how each of the three 'tests of soundness' has been met by the Gloucestershire WCS. It addresses the following key areas:

- Participation/engagement
- Research/evidence
- Consideration of alternatives
- Delivery
- Flexibility and monitoring; and
- Consistency with national policy.

1.9 The soundness self-assessment should be read in conjunction with the other WCS submission WCS documents which are available to view online at:

[www.goucestershire.gov.uk/wcs/submission](http://www.goucestershire.gov.uk/wcs/submission)

1.10 Copies of all submission documents are also available in Gloucestershire libraries, at the County Council Offices, Shire Hall Westgate Street, Gloucester and in all District Council Offices.

Table 1 – Gloucestershire WCS Soundness Self-Assessment (Sept 2011)

Key question	Possible evidence	Evidence provided
<b>Justified</b>		
<b>Participation</b>		
1. Has the consultation process allowed for effective engagement of all interested parties?	The consultation statement	<p>Yes. The Waste Core Strategy (WCS) has been subjected to extensive stakeholder consultation throughout the Regulation 25 plan preparation stage in accordance with the Council's adopted Statement of Community Involvement (SCI).</p> <p>Consultation included issues and options (2006) preferred options (2008) and site options (2009). In addition, stakeholder forums were held in between these stages and newsletters have been distributed and made available on the Council's website throughout the process.</p> <p>The Council's Regulation 30(d) consultation statement sets out who was consulted during the plan preparation stage, how they were consulted the main issues raised and how those issues have been taken into account. A copy of the consultation statement has been provided and is also available online at <a href="http://www.goucestershire.gov.uk/wcs/submission">www.goucestershire.gov.uk/wcs/submission</a></p> <p>Stakeholders were also invited to comment at the publication stage (Dec 2010) and at focused changes (June 2011). In accordance with Regulation 30(e) a statement has been produced setting out the number of representations made and a summary of the key issues raised. A copy of this statement has been provided and is also available online at <a href="http://www.goucestershire.gov.uk/wcs/submission">www.goucestershire.gov.uk/wcs/submission</a></p>

Research/ fact finding		
<p>2. Is the content of the development plan document justified by the evidence?</p> <p>3. What is the source of the evidence</p> <p>4. How up to date and convincing is it?</p>	<p>i. Sections of the development plan document which show how the evidence points towards the selected strategy, policies or proposals</p> <p>ii. Sections of the pre-submission proposals documents</p> <p>iii. Sections of the preferred strategy report</p> <p>iv. Sections of the sustainability appraisal report which set out its main conclusions in relation to the policies in the development plan document</p> <p>v. Sections of the consultation statement</p> <p>OR</p> <p>A very brief statement of how the main findings of consultation support the policies, with reference to:</p> <ul style="list-style-type: none"> <li>○ reports to the council on the issues raised during participation, covering both the front-loading and formulation phases</li> <li>○ any other information on community views and preferences</li> </ul> <p>vi. The studies, reports and technical papers that provide the evidence for the policies set out in the development plan document. The date of preparation and who they were produced by should be signposted</p> <p>OR</p> <p>For each policy (or group of policies dealing with the same issue), a very brief statement of the evidence documents relied upon and how they support the policy (where this is not already clear in the reasoned justification in the development plan document)</p>	<p>Yes. The WCS is underpinned by an extensive evidence base. The sources of evidence are numerous and include a number of in-house and externally commissioned technical studies.</p> <p>Key evidence includes that relating to waste data, flood risk and site selection. There are clear linkages between the evidence base and the core policies including Core Policy WCS9 – Flood Risk, and Core Policy WCS4 – Other Recovery (including Energy Recovery).</p> <p>The evidence papers are intended to be 'living drafts' which can be updated to reflect changing circumstances/guidance/policy. Importantly, the evidence base has been 'refreshed' prior to submission to ensure it is up to date and relevant. The evidence papers can be viewed via the following web link <a href="http://www.goucestershire.gov.uk/wcs/evidence">www.goucestershire.gov.uk/wcs/evidence</a></p> <p>Within the text of the submission WCS, footnotes to relevant evidence papers are provided as appropriate including links to relevant web pages.</p> <p>The evidence base includes a final Sustainability Report prepared by independent consultants. A copy of the SA report has been provided and is also available online at <a href="http://www.goucestershire.gov.uk/wcs/submission">www.goucestershire.gov.uk/wcs/submission</a></p> <p>The Regulation 30(d) consultation statement identifies how the representations received at issues and options, preferred options and site options have been taken into account and helped to shape the final strategy.</p> <p>Broadly speaking, Core Policies have been informed by technical evidence as follows: Core Policy 1 (waste data paper, waste hierarchy paper) Core Policy 2 (waste hierarchy paper, locational analysis, making provision and waste data) Core Policy 3 (waste data, making provision, locational analysis, waste hierarchy) Core Policy 3a (waste hierarchy paper, locational</p>

		<p>analysis, making provision and waste data) Core Policy 4 (call for sites, site selection, urban growth areas, CHP potential and locational analysis) Core Policy 5 (sewage treatment facilities) Core Policy 6 (hazardous waste, environmental acceptability, waste hierarchy) Core Policy 7 (cumulative impact) Core Policy 8 (making provision, cumulative impact) Core Policy 9 (flooding, locational analysis, climate change) Core Policy 10 (waste facilities in the green belt) Core Policy 11 (landscape and AONB, locational analysis) Core Policy 12 (biodiversity, locational analysis) Core Policy 13 (landscape and AONB, waste facility types, environmental acceptability) Core Policy 13a ((waste hierarchy paper, locational analysis, making provision and waste data) and Core Policy 14 (transport, locational analysis, environmental acceptability).</p>
<p>5. What assumptions had to be made in preparing the development plan documents?</p> <p>6. Are the assumptions reasonable and justified?</p>	<ul style="list-style-type: none"> <li>i. Sections of the development plan documents setting out the assumptions</li> <li>ii. Sections of the sustainability appraisal report setting out the assumptions</li> <li>iii. A very brief statement for each assumption as to how the evidence led to the assumption</li> <li>iv. Reference to national or regional policy, correspondence from bodies consulted or technical papers that provide the basis for assumptions</li> </ul>	<p>A number of assumptions have been made in preparing the WCS. This includes mainly assumptions relating to; future growth in waste arisings, the amount of managed waste, future recycling rates (and the impact on waste capacity requirements) and the amount of landfill voidspace remaining.</p> <p>The assumptions made in relation to each of these issues have been clearly set out at issues and options, preferred options, site options and publication.</p> <p>Detailed technical evidence has been made available throughout the Regulation 25 consultation stage in support of the assumptions including evidence papers dealing with waste data, making provision and hazardous waste.</p> <p>See <a href="http://www.goucestershire.gov.uk/wcs/evidence">www.goucestershire.gov.uk/wcs/evidence</a></p> <p>A further key assumption made is that most growth in Gloucestershire will continue to be focused on Gloucester and Cheltenham. This forms part of the rationale for focusing the location of strategic waste management facilities in the central area of the county in the area defined as 'Zone C'.</p>

		<p>Evidence papers produced in relation to this issue included 'broad locational analysis', 'making provision' 'urban growth areas' and 'links with Districts and Neighbouring authorities'. An overall evidence update paper was published alongside the publication WCS in December 2010.</p> <p>Copies have been made available and can also be viewed online at <a href="http://www.goucestershire.gov.uk/wcs/evidence">www.goucestershire.gov.uk/wcs/evidence</a></p> <p>The WCS has been subject to a process of sustainability appraisal (SA) at each stage throughout Regulation 25 and at publication. A copy of the SA report has been provided and can also be viewed online at <a href="http://www.goucestershire.gov.uk/sustainabilityappraisal">www.goucestershire.gov.uk/sustainabilityappraisal</a></p>
<p><b>Alternatives</b></p> <p>7. Can it be shown that the council's chosen approach is the most appropriate given the reasonable alternatives?</p> <p>8. Have realistic alternatives been considered and is there a clear audit trail showing how and why the preferred strategy/approach was arrived at?</p> <p>9. Where a balance had to be struck in taking decisions between competing alternatives is it clear how and why these decisions were made?</p>	<p>i. Sections of the consultation statement showing how the community was involved in considering issues, alternatives and options</p> <p>ii. Documents used in community involvement with stakeholders and communities encouraging them to identify the issues and options they wished to see considered</p> <p>iii. Any report produced at the end of the front loading phase of plan preparation setting out the issues and options raised</p> <p>iv. Sections of the preferred strategy report explaining:</p> <ul style="list-style-type: none"> <li>• how alternatives were developed and evaluated, and</li> <li>• why alternatives were rejected in favour of the preferred strategy</li> </ul> <p>v. Sections of the sustainability appraisal report showing the options and alternatives and explaining how they were objectively assessed</p> <p>vi. Reports prepared during the plan preparation process (including after the preferred strategy participation) contributing to the decisions made on the inclusion of policies in the development plan document</p> <p>vii. Sections of the consultation statement explaining how the main findings of consultation support the decisions</p>	<p>Yes. The issues and options, preferred options and site options consultation documents identified distinct and reasonable alternative options based on the key issues identified. Each of these stages included formal consultation as outlined above through which stakeholders were invited to provide their views.</p> <p>At issues and options, alternative options discussed included those relating to; the plan period, strategic objectives, spatial vision, implementation of the waste hierarchy, making provision for new facilities, the location of new facilities, implementing the joint municipal waste management strategy, assessing cumulative impact, hazardous waste provision and development in the green belt and other nationally designated areas. A response report was made available setting out why certain options were taken forward whilst others were rejected. A copy has been made available and can also be viewed online at <a href="http://www.goucestershire.gov.uk/wcs/submission">www.goucestershire.gov.uk/wcs/submission</a></p> <p>At preferred options, alternative options discussed included those relating to; waste reduction, recycling/composting, developing markets for recyclates, waste recovery (treatment) the location of strategic waste facilities, dealing with hazardous</p>

	<p>viii. Sections of the representations statement</p> <p>OR</p> <p>A brief statement of the influence upon decisions of: the issues raised during stakeholder and community engagement, and how they have been addressed</p> <p>ix. Any other documentation showing how alternatives were developed and evaluated</p> <p>x. A very brief statement and any other supporting documentation of the way decisions have been taken</p>	<p>waste, waste water, cumulative impact, AONB, archaeology, Green Belt and sites of biodiversity interest. Other options included the preferred spatial vision and strategic objectives for the WCS. A response report was made available setting out why certain options were taken forward whilst others were rejected. A copy has been made available and can also be viewed online at <a href="http://www.goucestershire.gov.uk/wcs/submission">www.goucestershire.gov.uk/wcs/submission</a></p> <p>At site options, the alternative options focused mainly on 13 different sites considered potentially suitable for waste recovery operations. These site options were derived from a long list of potential sites and locations suitable for waste, all of which are discussed in the supporting evidence base.</p> <p>Other options included the degree to which sites should be focused within the area defined as 'Zone C', outside 'Zone C' or a combination of the two, as well as the potential for proposed urban extensions at Gloucester and Cheltenham to be used for waste recovery.</p> <p>Each of these options has been tested through a robust process of Sustainability Appraisal (SA).</p> <p>Copies of the SA reports provided. See <a href="http://www.goucestershire.gov.uk/sustainabilityappraisal">www.goucestershire.gov.uk/sustainabilityappraisal</a></p> <p>The response reports produced at each stage and the overarching Regulation 30(d) consultation statement explain why certain options were evaluated and later rejected and others were developed and taken forward. Copies of the response reports and the consultation statement have been provided and are also available to view online at <a href="http://www.goucestershire.gov.uk/wcs/submission">www.goucestershire.gov.uk/wcs/submission</a></p>
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<p>10. Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the development plan document from the start?</p>	<ul style="list-style-type: none"> <li>i. A structure to the development plan document which reports the sustainability appraisal findings in relation to each policy</li> <li>ii. Sections of the sustainability appraisal report which set out how sustainability appraisal has influenced the development of the preferred strategy and how policies have been revised in the light of sustainability appraisal findings</li> <li>iii. Reports made as part of plan-making which indicate how sustainability appraisal has influenced the choice of strategy and the content of policies</li> </ul>	<p>Yes. Sustainability Appraisal (SA) context and scoping reports were published in August 2005 and subsequently updated in November 2005, April 2006, June 2008 and January 2009.</p> <p>Throughout the plan preparation stage and at publication, each stage has been accompanied by a robust process of Sustainability Appraisal (SA), which has tested and helped determine the choices taken and shape the various options and proposals put forward. SA reports have been made available throughout the process including a final SA report of the publication WCS in December 2010 which was updated for focused changes in June 2011.</p> <p>Copies of the SA reports have been provided and also available online at <a href="http://www.gloscestershire.gov.uk/sustainabilityappraisal">www.gloscestershire.gov.uk/sustainabilityappraisal</a></p>
<p>11. Does the development plan document adequately expand upon regional guidance rather than simply duplicate it?</p> <p>12. Does the strategy take forward the regional context reflecting the local issues and objectives?</p>	<ul style="list-style-type: none"> <li>i. Sections of the development plan document which explain where and how regional guidance has been elaborated upon and the reasons</li> <li>ii. The regional development agency/regional planning body letter confirming that the development plan document is in general conformity with the regional special strategy</li> <li>iii. Representations received from the regional development agency/regional planning body</li> <li>iv. Representations from the Government Office</li> <li>v. Reports or copies of correspondence as to how the representations have been considered and dealt with</li> </ul>	<p>Yes. Whilst it is the Government's intention to abolish the draft South West Regional Spatial Strategy (RSS) at the present time it remains a material consideration.</p> <p>The preferred locational strategy set out in the submission WCS, which is focused on locating strategic waste facilities in the area defined as 'Zone C' is consistent with the 'sequential' approach set out in the draft South West Regional Spatial Strategy (SW-RSS).</p> <p>Furthermore, in accordance with transitional arrangements, the data from the RSS (which itself was derived from the Regional Waste Strategy (2004) has been used in conjunction with the Council's own waste data to inform the capacity requirements set out in the submission WCS.</p> <p>Letters of conformity were received from the Regional Planning Body at issues and options, preferred options and site options prior to the revocation of the RSS (copies provided). Whilst a request for confirmation of conformity was also made at publication, due the abolition of South West Councils, the Regional Planning Body, no confirmation was</p>

		<p>received. A copy of the request letter has been provided.</p> <p>Responses were received from the Government Office for the South West at issues and options, preferred options and site options but not at publication due to the closure of the Government Office.</p> <p>The response reports produced at each stage explain how these and other representations have been considered and dealt with. Copies of the response reports have been provided and are also available online at <a href="http://www.goucestershire.gov.uk/wcs/submission">www.goucestershire.gov.uk/wcs/submission</a></p> <p>The WCS now strikes a balance between the regional context and how it affects the prevailing local issues and objectives relating to Gloucestershire.</p>
<b>Effective</b>		
<b>Deliverable</b>		
<p>13. Has the council clearly identified what the issues are that the development plan document is seeking to address?</p> <p>14. Have priorities been set so that it is clear what the development plan document is seeking to achieve?</p>	<ul style="list-style-type: none"> <li>i. Sections of the development plan document which refer to the vision and objectives of the sustainable community strategy and the issues identified there</li> <li>ii. A statement prepared following stakeholder and community engagement in the front-loading phase of plan-making setting out the identified issues for the development plan document A spatial portrait based on the advice in 'Policies for spatial plans' presented as part of the core strategy</li> <li>iii. A core strategy vision which is framed to set out the outcomes which are sought for the future</li> <li>iv. Sections of the development plan document which identify the main issues addressed</li> <li>v. Sections of the development plan document which indicate the priority outcomes</li> </ul>	<p>Yes. The issues and options, preferred options and site options consultation documents identify the key issues for the WCS to address and set out the various options for tackling these. These issues and options were also discussed at stakeholder forum events held in 2006 and 2008.</p> <p>Building on the regulation 25 stage, Section 2 of the submission WCS sets out a spatial portrait of Gloucestershire and from this identifies 10 key issues to be addressed through the Spatial Strategy.</p> <p>With regard to priority setting, Section 3 of the submission WCS identifies five key drivers including climate change, waste policy, rising costs, changing technology and waste forecasts. Building on these drivers, Section 3 sets out a vision and strategic objectives for the future. The vision is framed in such a way that it clearly articulates how Gloucestershire will change in the future and the objectives are as SMART as possible i.e. specific, measurable, achievable, realistic and time-related.</p>

		<p>With regard to the SCS, Appendix 2 of the WCS highlights key linkages with relevant international, national, regional and local plans, policies and programmes including the Sustainable Community Strategy for Gloucestershire (SCS). The appendix highlights the main aims and objectives of the SCS that are relevant to waste and describes how they have been taken into account in the proposed submission WCS. Further commentary on this issue is set out in Section 3.0.</p> <p>The Monitoring Framework set out in Section 6.0 identifies relevant linkages between the Core Policies and the aims and objectives of the SCS.</p>
<p>15. Are there any cross-boundary issues that should be addressed and, if so, have they been adequately addressed?</p>	<ul style="list-style-type: none"> <li>i. Sections of the regional special strategy which identify cross-boundary issues.</li> <li>ii. Sections of the development plan document setting out cross-boundary issues and the response to them</li> <li>iii. Reports on relevant studies which cover wider areas than the local authority and how the development plan document addresses their findings or recommendations</li> <li>iv. Records of meetings with adjoining authorities or relevant agencies which confirm that there are no cross-boundary issues of significance</li> </ul>	<p>Yes. Waste management does not respect administrative boundaries and it is the case that movements of waste, particularly commercial and industrial, construction and demolition and hazardous waste, take place across county and district boundaries.</p> <p>However, in its role as Waste Disposal Authority (WDA) the County Council only has control over municipal waste and cannot control cross-boundary movements of other waste types. This fact is clearly acknowledged in the submission WCS.</p> <p>Notwithstanding this, the vision set out in the submission WCS emphasises the importance of ensuring enough waste management capacity is made available to meet Gloucestershire's needs. It should be remembered that the emerging regional context for waste management in the draft RSS identified indicative targets for the provision of waste for municipal and commercial waste based on the County sub-areas such as Gloucestershire.</p> <p>Meetings were held with representatives of adjoining local authorities during the Regulation 25 plan preparation stage. An evidence paper was prepared highlighting the main issues raised during these discussions. A copy of the evidence paper has been provided and is also available online at <a href="http://www.goucestershire.gov.uk/wcs/evidence">www.goucestershire.gov.uk/wcs/evidence</a></p>

		<p>Discussions have also been held with the Government Office for the South West and the Environment Agency. These have been generally positive and have raised no concerns or issues of major significance regarding cross-boundary matters.</p> <p>Although there are cross-boundary movements of commercial, construction and demolition and hazardous wastes, the capacity of existing, permitted and proposed (allocated) waste management facilities in Gloucestershire is such that the County is not reliant on other local authority areas to meet its forecast capacity requirements. The submission WCS sets out this issue clearly. Detailed information on waste management capacity is set out in the Waste Data Paper 2010 a copy of which has been provided and is also available online at <a href="http://www.goucestershire.gov.uk/wcs/evidence">www.goucestershire.gov.uk/wcs/evidence</a></p>
16. Does the development plan document contain clear objectives?	<ul style="list-style-type: none"> <li>i. A spatial portrait which identifies the key issues facing the area</li> <li>ii. A core strategy vision which is framed to set out the outcomes which are sought for the future</li> <li>iii. The strategic objectives of the development plan document, and the commentary in the development plan document of how they derive from the spatial portrait and vision</li> </ul>	<p>Yes. The WCS includes a concise spatial portrait describing the key characteristics of the county in broad terms and the current arrangements for waste management in more detail. In accordance with guidance, the spatial portrait begins to articulate the key issues facing Gloucestershire which are then summarised at the end of Section 2.0.</p> <p>Building on the key issues, key drivers and spatial vision identified in Sections 2 and 3, the submission WCS identifies five strategic objectives. These objectives have been refined throughout the Regulation 25 plan preparation stage and have been made as clear, locally distinctive and SMART (i.e. specific, measurable, achievable, realistic and time-related) as possible.</p> <p>The five strategic objectives form the basis of the spatial strategy, implementation and monitoring framework set out in Sections 4, 5 and 6 of the WCS.</p>

<p>17. Are the objectives specific to the place; as opposed to being general and applicable to anywhere?</p> <p>18. Is there a direct relationship between the identified issues and the objectives?</p>	<ul style="list-style-type: none"> <li>i. The spatial portrait and the commentary in the development plan document as to how the objectives derive from it</li> <li>ii. Confirmation from the local strategic partnership and partner organisations that they agree the objectives as being specific to the place</li> </ul>	<p>Yes. The spatial portrait and the key issues, vision and strategic objectives that flow from it, have been refined through the Regulation 25 plan preparation stage and publication and are considered to be locally distinctive and relevant to Gloucestershire. The views of a broad range of stakeholders have been taken into account.</p> <p>Joint working with the Gloucestershire Waste Partnership (GWP) during the plan preparation stage included a Waste Forum event held in 2006. The forum addressed a number of issues including the vision and objectives of the WCS.</p> <p>In addition, the views of the Gloucestershire LSP have been sought throughout the Regulation 25 plan preparation stage and at publication.</p> <p>Flood risk is a good example of a key issue of particular relevance to Gloucestershire that has been reflected in the spatial vision, strategic objectives and subsequent spatial strategy.</p>
<p>19. Is it clear how the policies will meet the objectives?</p> <p>20. Are there any obvious gaps in the policies, with regard to the objectives of the development plan document?</p>	<ul style="list-style-type: none"> <li>i. Relevant sections of the development plan document which explain how policies derive from the objectives and are designed to meet them</li> <li>ii. Relevant sections of the sustainable community strategy which identify its objectives</li> <li>iii. Confirmation from the local strategic partnership and partner organisations that they believe the policies will achieve the agreed objectives</li> <li>iv. Research reports and studies which address the means to address objectives and conclude that the policies are appropriate and should succeed</li> <li>v. Sections of the development plan document, reports or other documents which discuss the matters which should be addressed in the development plan document.</li> </ul>	<p>Yes. The core policies are laid out in accordance with the five strategic objectives. This helps to ensure that the relationship between the strategic objectives and the core policies is clear and easy to understand for the reader.</p> <p>For ease of reference, Appendix 3 of the submission WCS consists of a schedule which sets out the relationship between the core policies and the strategic objectives. It also helps to demonstrate that there are no 'gaps' in the core policies when considered against the strategic objectives.</p> <p>A technical evidence paper was published at the preferred options stage in relation to the issue of implementation and monitoring.</p> <p>Through further consultation including site options, these initial ideas have been developed into a robust monitoring and implementation framework, which includes a series of targets and indicators which will</p>

		help the Council to measure the extent to which the strategic objectives and core policies are being achieved. This implementation and monitoring frameworks are set out in Sections 5 and 6 of the submission WCS.
21. Are there realistic timescales related to the objectives?	<ul style="list-style-type: none"> <li>i. Sections of the development plan document which address delivery and the timescales for key developments and initiatives</li> <li>ii. Confirmation from the local strategic partnership and partner organisations that the timescales are realistic in terms of their contribution to delivery</li> </ul>	<p>Yes. The strategic objectives are as far as possible SMART i.e. specific, measurable, achievable, realistic and time-related.</p> <p>The implementation framework set out in Section 5.0 of the submission WCS clearly identifies the mechanisms through which each Core Policy will be delivered and the anticipated timing of delivery as well as the agencies involved, funding and any potential constraints that may need to be overcome.</p> <p>Dialogue has been entered into with the Gloucestershire Local Strategic Partnership and the Waste Disposal Authority (WDA) on all matters relating to the WCS including implementation and delivery.</p> <p>An evidence paper on joint working with the WDA was published in 2007. See <a href="http://www.goucestershire.gov.uk/wcs/evidence">www.goucestershire.gov.uk/wcs/evidence</a></p> <p>All representations received are set out in the issues and options, preferred options and site options response reports and are summarised in the overarching Regulation 30(d) consultation statement. Copies of these have been provided and are also available online at <a href="http://www.goucestershire.gov.uk/wcs/submission">www.goucestershire.gov.uk/wcs/submission</a></p>

22. Are the policies internally consistent?	<ol style="list-style-type: none"> <li>i. Sections of the development plan document, documents used in community involvement, and technical papers which demonstrate that the objectives are consistent</li> <li>ii. A very brief statement explaining how the council considers its objectives are consistent</li> </ol>	<p>Yes. The core policies are drawn from the key issues, vision and strategic objectives and have been developed and refined through extensive Regulation 25 consultation.</p> <p>Appendix 3 of the submission WCS is a schedule setting out the linkages between the strategic objectives and core policies.</p> <p>In addition, the monitoring framework included at Section 6.0 identifies the linkages between the Core Policies and the Sustainability Appraisal (SA) objectives.</p>
23. Does the development plan document contain material which: <ul style="list-style-type: none"> <li>• is already in another plan</li> <li>• should be logically be in a different plan</li> <li>• should not be in a plan at all?</li> </ul>	<ol style="list-style-type: none"> <li>i. Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each development plan document. This should show how they combine to provide a coherent policy structure</li> <li>ii. Representations from the Government Office</li> <li>iii. Reports or copies of correspondence as to how the representations have been considered and dealt with</li> </ol>	<p>No. The scope and purpose of the WCS is clearly set out in the Minerals and Waste Development Scheme (MWDS). A copy of the current MWDS has been provided and is also available online at <a href="http://www.goucestershire.gov.uk/wcs/mwds">www.goucestershire.gov.uk/wcs/mwds</a></p> <p>Whilst the submission WCS includes reference to other plans and strategies, this is intended to explain the policy context within which the WCS has been developed and will operate. Any duplication of content is minimised through the use of footnotes.</p> <p>Representations were received from Government Office at issues and options, preferred options and site options. These are set out in the response reports produced at issues and options, preferred options and site options. Copies of these reports have been provided and are also available to view online at <a href="http://www.goucestershire.gov.uk/wcs/submission">www.goucestershire.gov.uk/wcs/submission</a></p> <p>In addition, the overarching regulation 30(d) consultation statement summarises how the representations received were considered and taken into account in the publication WCS. A copy has been provided and is also available online at <a href="http://www.goucestershire.gov.uk/wcs/submission">www.goucestershire.gov.uk/wcs/submission</a></p>

<p>24. Does the development plan document explain how its key policy objectives will be achieved?</p>	<ul style="list-style-type: none"> <li>i. Sections of the development plan document that identify the key objectives and how they will be delivered upon</li> <li>ii. Confirmation from the relevant agencies that they support the objectives and the identified means of delivery</li> <li>iii. Other supporting material – for example, commitments in the local area agreement that will support the delivery of the strategy in the development plan document</li> </ul>	<p>Yes. The implementation framework included at Section 5.0 of the submission WCS identifies how each core policy will be delivered including the lead agency, other responsible agencies, funding requirements and delivery timescales.</p> <p>It also highlights any potential constraints to delivery and provides commentary on potential remedial action that could be taken to overcome these issues, for example a review of the policy and engagement with the District Councils.</p> <p>Representations have been received from a number of relevant delivery agencies and organisations throughout the Regulation 25 plan preparation stage including the Highways Agency, Environment Agency, District Councils etc.</p> <p>Their comments and a description of how they have been taken into account are set out in the response reports produced at issues and options, preferred options and site options. A summary is also set out in the overarching Regulation 30(d) consultation statement.</p> <p>Copies of these documents have been provided and are also available online at <a href="http://www.goucestershire.gov.uk/wcs/submission">www.goucestershire.gov.uk/wcs/submission</a></p> <p>The monitoring framework included at Section 6.0 of the WCS illustrates how progress will be measured including the indicators that will be used in the Council's Annual Monitoring Report (AMR).</p> <p>This includes linkages with the Gloucestershire Local Area Agreement (LAA).</p>
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<p>25. If there are development management policies, are they supportive of the strategy and objectives?</p>	<ul style="list-style-type: none"> <li>i. Sections of the development plan document that show how the development management policies: <ul style="list-style-type: none"> <li>• will help to deliver the strategy</li> <li>• derive from, and elaborate on, the objectives and policies of the plan</li> </ul> </li> </ul>	<p>Yes. The submission WCS includes a number of overarching 'development management' type policies dealing with detailed matters such as flood risk and design.</p> <p>These clearly relate to and support the key issues, vision and strategic objectives identified in Sections 2 and 3 and build on issues that have been raised by stakeholders through the plan preparation and publication stage.</p> <p>Appendix 3 identifies the linkages between each core policy and the five strategic objectives of the WCS.</p> <p>It should be noted that it remains the Council's intention to produce a separate development management DPD which will contain more detailed criteria type policies against which to consider planning applications for waste related development.</p> <p>The submission WCS includes a schedule of adopted Waste Local Plan policies, explaining which will be replaced by the WCS and which will remain in place until the development management waste DPD is put into place.</p>
<p>26. Have the infrastructure implications of the strategy/policies clearly been identified?</p>	<ul style="list-style-type: none"> <li>i. A section or sections of the development plan document where infrastructure needs are identified and the proposed solutions put forward</li> <li>ii. Representations in respect of infrastructure</li> <li>iii. Reports or copies of correspondence as to how representations in relation to infrastructure have been considered and dealt with</li> </ul>	<p>Yes. Relevant infrastructure providers including the highways agency have been engaged throughout the preparation of the WCS. These stakeholders are identified in the Regulation 30(d) consultation statement.</p> <p>With specific regard to the strategic site allocations identified in the submission WCS, the general and key development criteria identified in the supporting site schedules identify the necessary infrastructure enhancements required to support those allocations such as transport and landscaping improvements.</p> <p>It is important to note that waste management development is in itself an important type of 'infrastructure' helping to support other forms of new development such as housing and employment being promoted through District Local Development</p>

		Frameworks. This includes all types of waste infrastructure including sewage treatment/waste water infrastructure.
27. Are the delivery mechanisms and timescales for implementation of the policies clearly identified?	<ul style="list-style-type: none"> <li>i. Sections of the development plan document setting out delivery mechanisms and timescale</li> <li>ii. Other development plan documents being prepared that develop the policies of the core strategy further and set out how they will be delivered</li> <li>iii. Research or studies that address matters of delivery and the realistic timescales</li> <li>iv. Documents that set out arrangements made or planned for local delivery vehicles, or other delivery mechanisms</li> <li>v. Very brief statements on how other stakeholders intend to support the delivery of the policies, with any supporting correspondence or reports by the authority or the relevant stakeholder</li> <li>vi. Correspondence from stakeholders on delivery mechanisms and timescale</li> <li>vii. Reports or copies of correspondence as to how representations on delivery and implementation have been considered and dealt with</li> </ul>	<p>Yes. The issue of delivery and implementation was identified and included for discussion at issues and options and preferred options with a separate evidence paper on implementation being published alongside the preferred options paper. A copy of the paper has been provided and is also available online at <a href="http://www.goucestershire.gov.uk/wcs/evidence">www.goucestershire.gov.uk/wcs/evidence</a></p> <p>The site options paper (2009) built on this and identified a draft implementation framework. Generally supportive comments were received particularly from the waste operators/industry (see Site Options response report and Regulation 30(d) consultation statement - copies provided).</p> <p>Building on this approach, the implementation framework included at Section 5.0 of the submission WCS clearly and robustly sets out how each core policy will be delivered, by who and when. It also deals with issues of funding and potential constraints to delivery.</p> <p>The implementation framework informs the monitoring framework set out in Section 6.0 which will form the basis of annual monitoring through the Council's Annual Monitoring Report (AMR).</p>
28. Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the strategy/policies?	<ul style="list-style-type: none"> <li>i. Confirmation from infrastructure providers that they support the solutions proposed and the identified means and timescales for their delivery</li> <li>ii. Representations in respect of infrastructure</li> <li>iii. Reports or copies of correspondence on how representations in relation to infrastructure and its timing have been considered and dealt with</li> </ul>	<p>Yes. The strategic site allocations identified in the submission WCS have been subject to internal and external consultation and the general and key development criteria identified in the strategic site schedules identify the necessary infrastructure enhancements required to support those allocations such as junction improvements and landscaping.</p> <p>It is important to note that waste management development is in itself an important type of 'infrastructure' helping to support other forms of new development such as housing and employment being promoted through District Local Development Frameworks. This includes all types of waste infrastructure including sewage treatment/waste water</p>

		<p>infrastructure.</p> <p>Relevant infrastructure agencies including the highways agency have been engaged throughout the preparation of the WCS. Responses from these bodies are set out in the various Regulation 25 response reports and the overarching consultation statement copies of which have been provided and are also available online at <a href="http://www.goucestershire.gov.uk/wcs/submission">www.goucestershire.gov.uk/wcs/submission</a></p>
<p>29. Is it clear who is intended to implement each part of the strategy/development plan document?</p> <p>30. Where actions required to implement policy are outside the direct control of the council, is there evidence of commitment from the relevant organisation to implement the policies?</p>	<ul style="list-style-type: none"> <li>i. Sections of the development plan document setting out responsibilities for delivery</li> <li>ii. Correspondence showing how other stakeholders intend to support the delivery of the policies</li> <li>iii. Reports by the council or the relevant stakeholder</li> <li>iv. Representations from stakeholders on implementation</li> <li>v. Reports or copies of correspondence as to how representations on delivery and implementation have been considered and dealt with</li> </ul>	<p>Yes. The implementation framework at Section 5.0 of the submission WCS identifies how each core policy will be delivered including the lead agency, other responsible agencies, funding requirements and delivery timescales.</p> <p>It also highlights any potential constraints to delivery and provides commentary on the potential remedial action that may be taken to overcome these such as a review of the policy or engagement with the District Councils.</p> <p>The monitoring framework at Section 6.0 illustrates how the implementation of core policies will be assessed through the Council's Annual Monitoring Report (AMR).</p> <p>The Regulation 30(d) consultation statement summarises the representations that have been received on the issue of implementation and how these have been taken into account in the submission WCS.</p> <p>A copy of this statement has been provided and is also available online at <a href="http://www.goucestershire.gov.uk/wcs/submission">www.goucestershire.gov.uk/wcs/submission</a></p>

<p>31. Does the development plan document reflect the concept of spatial planning?</p> <p>32. Does it go beyond traditional land use planning by bringing together – and integrating – policies for development, and the use of land, with other policies and programmes from a variety of organisations that influence the nature of places and how they function?</p>	<ul style="list-style-type: none"> <li>i. Sections of the development plan document that reflect the plans or strategies of other bodies</li> <li>ii. Expressions of support from bodies responsible for other strategies affecting the area</li> <li>iii. Representations in respect of services provided by other agencies</li> <li>iv. Reports or copies of correspondence as to how the representations have been considered and dealt with. These should either clarify the issues raised in the representation, or include a copy of the substance of the representation</li> </ul>	<p>Yes. Section 3.0 of the submission WCS sets out a number of key drivers including climate change, waste management policy, rising costs, changing technology and future waste forecasts and capacity requirements. A number of these issues go beyond the traditional concept of land-use planning.</p> <p>In addition, a number of the issues addressed in the spatial strategy and core policies deal with matters outside the scope of land-use planning such as education (in respect of waste issues) partnership working and economic development.</p> <p>Representations have been received from a number of bodies responsible for other relevant strategies including the Waste Disposal Authority (WDA) and District Councils. These are set out in the various plan preparation response reports, copies of which have been provided.</p> <p>Appendix 2 of the submission WCS is a detailed schedule explaining how the aims and objectives of various international, national, regional and local plans, policies and programmes have been reflected in the WCS.</p> <p>The Regulation 30(d) consultation statement provides a summary of the key issues raised during the preparation of the WCS and how these have been taken into account.</p> <p>A copy of this report has been provided and is also available to view online at <a href="http://www.goucestershire.gov.uk/wcs/submission">www.goucestershire.gov.uk/wcs/submission</a></p>
<p>33. Does the development plan document take into account matters which may be imposed by circumstance, notwithstanding the council's views about the matter?</p>	<ul style="list-style-type: none"> <li>i. Explicit recognition within the development plan document that this may happen, and clear information about how the plan strategy can accommodate them</li> <li>ii. Consideration of the options in relation to such matters as part of the evaluation of alternatives in a report on the preferred strategy</li> </ul>	<p>Yes. The implementation framework set out in Section 5.0 of the submission WCS identifies a number of potential constraints to delivery including factors that may be outside the direct control of Gloucestershire County Council and identifies the potential measures that may be put into place to address these.</p>

Flexible		
34. Is the development plan document flexible enough to respond to a variety of, or unexpected changes in, circumstances?	<ul style="list-style-type: none"> <li>i. Sections of the development plan document setting out the assumptions of the plan and identifying the circumstances when policies might need to be reviewed</li> <li>ii. Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor: <ul style="list-style-type: none"> <li>• the effectiveness of policies and what evidence is being collected to undertake this</li> <li>• changes affecting the baseline information and any information on trends on which the development plan document is based</li> </ul> </li> <li>iii. Statements or correspondence from stakeholders which commit to providing information to be used in monitoring the progress of the policies and changes in the baseline</li> <li>iv. Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances</li> </ul>	<p>Yes. The implementation framework set out in Section 5.0 of the submission WCS builds in flexibility by taking account of possible constraints to delivery and identifying potential mitigation that could be undertaken to overcome those constraints.</p> <p>Representations have been received from a number of agencies responsible for the provision of baseline information e.g. waste data from the Environment Agency.</p> <p>The monitoring framework at Section 6.0 provides a robust method of measuring policy implementation and will form the basis of the Council's Annual Monitoring Report (AMR).</p> <p>This will allow the impact of policies to be measured and where policies are failing to deliver their objectives or may be having unintended consequences, they may be replaced or revised as appropriate.</p>
35. Is the development plan document sufficiently flexible to deal with any changes to, for example, housing figures from an emerging regional special strategy?	<ul style="list-style-type: none"> <li>i. Sections within the development plan document dealing with possible change areas and how they would be dealt with, including mechanisms for the rate of development to be increased or slowed and how that would impact on other aspects of the strategy and on infrastructure provision</li> <li>ii. Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances</li> </ul>	<p>Yes. The submission WCS builds in a large degree of flexibility. The implementation framework set out in Section 5 identifies how each core policy will be delivered and any potential constraints to delivery.</p> <p>Where constraints are identified, it suggests potential action which might be taken to overcome those constraints.</p> <p>In terms of identifying future waste provision requirements, this is not an exact science due to potential future changing circumstances and the use of criteria-based policy in conjunction with the allocation of four strategic sites will help to ensure the balance between the degree of certainty and flexibility which can be achieved.</p> <p>Furthermore, the fact that the WCS is 'technology neutral' ensures flexibility regarding the type of waste recovery process that may come forward on the</p>

		<p>strategic site allocations or through any speculative proposal.</p> <p>This approach is considered consistent with the Companion Guide to PPS10 Planning for Sustainable Waste Management, which states that, local authorities in preparing Waste Core Strategies and other development plan documents should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.</p>
36. Does the development plan document include the remedial actions that will be taken if the strategies/policies are failing?	<ul style="list-style-type: none"> <li>i. A section of the development plan document which expressly addresses flexibility</li> <li>ii. Sections of the development plan document identifying the key indicators of success of the strategy, and the remedial actions which will be taken if they are failing</li> </ul>	<p>Yes. The implementation framework set out in Section 5.0 of the submission WCS identifies potential constraints to the delivery of each core policy and the potential remedial measures that may be put into place to assist delivery.</p> <p>In addition, the monitoring framework set out in Section 6.0 sets out the indicators that will be used to determine the extent to which the strategy and core policies are being delivered or may be having unintended consequences.</p>
<b>Monitoring</b>		
37. Does the development plan document contain targets and milestones that relate to the delivery of the policies, including housing trajectories where the plan contains housing allocations?	<ul style="list-style-type: none"> <li>i. Sections of the development plan document setting out indicators, targets and milestones</li> <li>ii. Sections of the current annual monitoring report which report on indicators, targets, milestones and trajectories</li> <li>iii. Reference to any other reports or technical documents which contain information on the delivery of policies</li> </ul>	<p>Yes. The core policies include specific aims, objectives and targets. These are set out in the monitoring framework at Section 6.0. Where relevant, aims and objectives and targets from other plans and strategies are also highlighted.</p> <p>The monitoring framework clearly identifies how each core policy links to national, regional and local objectives and will be subsequently monitored through the Council's Annual Monitoring Report (AMR).</p> <p>A copy of the AMR has been provided and is also available online at <a href="http://www.goucestershire.gov.uk/amr">www.goucestershire.gov.uk/amr</a></p> <p>The AMR will be updated in due course to reflect the monitoring framework contained in the submission WCS.</p>

38. Is it clear how these are to be measured and are these linked to the production of the annual monitoring report?	<ul style="list-style-type: none"> <li>i. Sections of the development plan document setting out indicators, targets and milestones</li> <li>ii. Sections of the current annual monitoring report and the sustainability appraisal report setting out the framework for monitoring, including monitoring the effects of the development plan document against the sustainability appraisal</li> <li>iii. Reference to any other reports or technical documents which contain information on the collection or measurement of indicators</li> </ul>	<p>Yes. Section 6.0 of the submission WCS clearly explains that the proposed monitoring framework will form the basis of annual monitoring through the Council's Annual Monitoring Report (AMR).</p> <p>The monitoring framework highlights the linkages between the Core Policies and the Sustainability Appraisal (SA) objectives.</p> <p>A copy of the AMR has been provided and is also available online at <a href="http://www.goucestershire.gov.uk/amr">www.goucestershire.gov.uk/amr</a></p> <p>The AMR will be updated in due course to reflect the monitoring framework set out in the submission WCS.</p>
39. Are suitable targets and indicators present (by when, how and by whom)?	<ul style="list-style-type: none"> <li>i. Sections of the development plan document setting out indicators, targets and milestones</li> <li>ii. Sections of the current annual monitoring report that report on indicators, targets, milestones and trajectories</li> </ul>	<p>Yes. As far as possible, the Core Policies include specific aims, objectives and targets.</p> <p>These are reflected in the choice of indicators set out in the monitoring framework at Section 6.0. These indicators will be reported on through the Council's Annual Monitoring Report (AMR) a copy of which has been provided and is also available online at <a href="http://www.goucestershire.gov.uk/amr">www.goucestershire.gov.uk/amr</a></p> <p>The implementation framework in Section 5.0 clearly identifies the timescales for delivery.</p>
<b>National policy</b>		
<p>40. Does the development plan document contain any policies or proposals that are not consistent with national planning policy?</p> <p>41. If yes, is there a local justification?</p>	<ul style="list-style-type: none"> <li>i. Sections of the development plan document which refer to planning policy statements and justify why any policies are not consistent with national policy</li> <li>ii. Sustainable community strategy, studies forming evidence for the development plan document or other information which provide the stimulus for departing from national planning policy</li> <li>iii. Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community involvement</li> <li>iv. Representations from the Government Office on the preferred strategy or the submitted development plan document</li> </ul>	<p>No. The submission WCS is fully consistent with a range of national policy.</p> <p>This is explained throughout the WCS and also within the supporting evidence base. An example of this is the issue of flood risk which is addressed throughout the WCS and also through separate evidence including a strategic flood risk assessment (SFRA).</p> <p>The monitoring framework at Section 6 identifies relevant links between the core policies and national policy. This demonstrates that there are no conflicts.</p> <p>In addition, representations from the Government</p>

	<p>v. Reports or copies of correspondence as to how Government Office representations have been considered and dealt with</p>	<p>Office and the South West Regional Planning Body were received at issues and options, preferred options and site options. These have raised no concerns with regard to potential conflict with national policy. Copies of these representations have been provided.</p> <p>The Council's response to these representations is set out in the response reports from the issues and options, preferred options and site options stages as well as the overarching Regulation 30(d) consultation statement (copies provided).</p> <p>Whilst several of the core policies amplify national policy, this is only where the issue is considered to be of particular local importance to Gloucestershire, including flood risk, Green Belt and Areas of Outstanding Natural Beauty (AONB).</p> <p>Such issues have been agreed by stakeholders as being of particular local importance throughout the plan preparation stage.</p>
<p>42. Does the development plan document contain policies that do not add anything to existing national guidance?</p> <p>43. If so, why have they been included?</p>	<p>i. Sections of the development plan document which explain where and how national policy has been elaborated upon and the reasons</p> <p>ii. Representations from the Government Office</p> <p>iii. Reports or copies of correspondence as to how the representations have been considered and dealt with</p>	<p>It should be noted that a number of the core policies amplify national policy but only where the issue is considered to be of particular local importance to Gloucestershire, including flood risk, Green Belt and Areas of Outstanding Natural Beauty (AONB).</p> <p>Importantly, the policies have been given a distinct, local dimension including reference to the Gloucestershire Strategic Flood Risk Assessment (SFRA) the Nature Map for Gloucestershire and the Cheltenham – Gloucester Green Belt.</p>