

Buckinghamshire County Council

Minerals and Waste Core Strategy

Sustainability Appraisal

Addendum 1 – SA of Post-Examination Changes

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1 Introduction and Background

1.1 Background

Jacobs produced a Sustainability Appraisal (SA) Report, completed in August 2011, on behalf of Buckinghamshire County Council to accompany its Minerals and Waste Core Strategy. The Examination in Public for the Core Strategy took place from 21st February to 2nd March 2012.

As a result of the Examination, Buckinghamshire County Council has made several changes to the Core Strategy document. These changes are identified in the Schedule of Changes, produced by Buckinghamshire County Council, dated April 2012, which forms an addendum to the original Core Strategy. Thirty of these changes were identified by Buckinghamshire County Council and the Planning Inspector to be 'main' changes requiring Sustainability Appraisal.

Additionally, seven changes not identified as a 'main' change have minor implications for the outcomes of the SA, and these have been included for completeness.

The National Planning Policy Framework (NPPF) was issued by the Government in March 2012, after the completion of the Examination. It replaces most of the Planning Policy Statements (PPS) and Planning Policy Guidance (PPG) set out by the previous Government. The amendments made to the Core Strategy, as identified in the Schedule of Changes, include changes required as a result of the introduction of the NPPF. In addition, the 2011 SA Report was based on a methodology which assumes that national planning policy which is not otherwise interpreted at the local level in the Core Strategy will be in place. The changes to national planning policy therefore need to be reviewed in order to check whether the SA Report requires alteration, and including its conclusions and recommendations.

PPS10 (the national planning policy for waste management) is yet to be replaced.

1.2 Sustainability Appraisal Addendum

This document forms an addendum to the original SA Report. It identifies where the outcomes provided in the SA Report are changed as a result of the amendments to the proposed Core Strategy following the Examination in Public and the introduction of the NPPF.

1.3 Sustainability Appraisal Review Process

The review process is formed of two parts.

1. A screening process to identify whether the outcomes of the original SA Report could potentially change as a result of the proposed amendments to the Core Strategy and the new NPPF. This is set out in Section 2 of this addendum document.
2. A detailed review and assessment process to determine if in fact the proposed amendments to the Core Strategy and the new NPPF change the outcomes of the original SA. This is set out in Section 3 of the addendum document.

Table 2.1 below summarises each of the ‘main’ changes and the seven aforementioned additional amendments to the Core Strategy relevant to the SA, together with a brief assessment of the potential for each amendment to result in a change in the outcomes identified in the original SA Report. An analysis of the potential impact of the new NPPF (and thus the removal of the former national planning policy) on the outcomes of the original SA has also been undertaken. This is again with the exception of PPS10: *Planning for Sustainable Waste Management*, which is still in effect until further notice (an annex to the NPPF to replace PPS10 is due to be consulted on during 2012). Where potential to change the outcome of the original SA is identified, further detailed assessment has been required (refer to Section 3).

Table 2.1: Screening of Relevant Core Strategy Amendments

No.	Amendment to the Core Strategy	Potential to Change SA Outcome	Reason
2	Renaming the Waste Development Plan Document (WDPD) as the Waste Local Plan (WLP) and renaming the Minerals Development Plan Document (MDPD) as the Minerals Local Plan (MLP) in line with the new National Planning Policy Framework.	No BUT changes references	The change is purely in name. However, for consistency, all references to the WDPD and the MDPD in the SA Report should be amended to WLP and MLP respectively.
3	Insertion of a table showing which current Minerals and Waste Local Plan policies are to be replaced by which new Core Strategy policies.	Yes	<p>With the exception of Local Plan Policy 40, the inserted list of policies for replacement matches the list of policy changes noted in Appendix G (Effects of the Plan) of the SA Appendices (p.145). These policy changes were taken into account in the original SA review. Policy 40 relates to Plan Monitoring only, which is a procedural policy. Its exclusion from direct consideration in the SA is therefore considered not to result in any change to the original SA outcome.</p> <p>However, the SA Report appendix lists Policies 13 (Recycling / Composting Facilities), 15 (Waste Transfer Stations), 17 (Energy from Waste Plant), 18 (Landfill and Landraising), 19 (Calvert Landfill Site) and 30 (Proximity Principle and Sustainable Transport) as only being partially replaced. The new table to be inserted into the Core Strategy indicates that they are to be fully replaced. Sections of the SA therefore need to be reviewed to check the implications of this change.</p> <p>To determine any potential impacts on the outcome of the original SA Report, the following sections of the SA will require review:</p> <ul style="list-style-type: none"> • Section 6: Effects of the Plan; • Appendix E: Review of Calvert Proposals (part only); and • Appendix G: Effects of the Plan.
14	Population projections slightly increased over the plan period.	No	The increase is not significant enough to impact upon the analysis contained within the SA report. This amendment is therefore unlikely to result in any change to the original SA outcome.
15	Combine the information of the Key Diagram (Map 1), Map 4 (Minerals Proposals Map) and Map 5 (Waste Proposals Map) to form one Key Diagram. Retain Map 4 and 5 in the Core Strategy.	No	The amendment only combines several items of information, all of which were previously in the Core Strategy, on to one map, the 'Key Diagram'. It is therefore considered not to result in any change to the original SA outcome.

No.	Amendment to the Core Strategy	Potential to Change SA Outcome	Reason
20 23	Core Strategy Vision and Strategic Objective 10: replace an “protect” with “conserve”, as applies to the human, historic and natural environment. This change was requested by Natural England to correspond with the wording of the Countryside and Rights of Way Act 2000.	No	Although the SA Report refers back to the word “protect”, this change in phrasing is not expected to change the SA results significantly. Whilst in isolation, the word “conserve” can be construed to be weaker than “protect”, the wider context of the Vision / Objectives and of minerals and waste planning is such that trade-offs are inevitable. In the same sentence of the Vision, the phrase “as much as possible” (both in the original and amended versions) means that <i>either</i> phrasing must be supported by detailed policy in order to have actual environmental effects. Therefore, the SA, which looks at policy combined with the Vision (and Objectives), remains unchanged.
22	Strategic Objective 9, for Green Belt, alter phrasing from being protected from “unnecessary minerals and waste development”, to protected from “inappropriate” minerals and waste development.	Yes	The objectives were addressed in the SA compatibility appraisal, which tested them against the SA Objectives (Section 4 of the SA Report). The meaning behind this change could be significant in SA terms, and therefore Section 4 should be briefly reviewed.
24	Insertion of new policy CS/LP1: The Overarching Presumption in Favour of Sustainable Development in line with the new National Planning Policy Framework.	No BUT the SA Report needs to be amended to formally cover this new policy and SA needs to be reviewed as a whole (see final row of this table)	This policy was developed based on template policy wording provided by the Government’s Planning Advisory Service. The new policy and the NPPF makes more explicit the presumption in favour of sustainable development that previously existed in planning via PPS1, whereby planning permission would be granted if proposals were in line with the development plan, unless material considerations indicated otherwise. It is considered that material considerations can, and will, include the same factors as set out in the Core Strategy and other relevant legislation and policy which would have otherwise informed planning application determinations. Therefore, there is no material change to the SA or identified ‘likely significant effects’ of the plan. The major change is considered likely to be that for proposals which accord with the plan, ‘trade-offs’ (i.e. accepting certain negative effects as a necessary sacrifice to achieve net benefits in other areas) are agreed faster and more efficiently. This could lead to more direct discussion and agreement of mitigation rather than prolonged discussions about the determination itself. However, this is only an observation, and it is not the purpose of this SA to analyse and determine such procedural benefits or disbenefits. The insertion of this new policy is therefore considered not to result in any change to the original SA outcome.
29	Policy CS1: ‘Mineral Safeguarding’ changed to increase the prominence given to the Mineral Consultation Area (MCA), which itself is unchanged from the original Core Strategy (e.g. its boundary), and to existing policy on the MCA (pre-dating the Core Strategy), which is to remain in force, as to when districts must consult the county on planning	No	The amendments provide additional clarity as to the circumstances in which the districts need to consult the county with regard to planning applications. However, as this only clarifies the situation to ensure it remains as existing, it is considered not to result in any change to the original SA outcome.

No.	Amendment to the Core Strategy	Potential to Change SA Outcome	Reason
	applications.		
35 & 36	Paragraphs 3.24 and 3.25 completely replaced to take account of the new methodology for determining minerals supply identified in the new National Planning Policy Framework.	No	<p>This change in methodology, which has been set down by the Government, only results in a small increase in the amount of minerals to be excavated per annum in Buckinghamshire – from 1.05 mtpa to 1.09 mtpa. This amendment to the plan is therefore considered not to result in any change to the original SA outcome.</p> <p>The early acceptance of the methodology for the preparation of a Local Aggregate Assessment, as set out in the NPPF at paragraph 145, including the consideration of 'other relevant local information' (for example, the cross-boundary movement of material) and assessment of all supply options (including recycled sources) is expected to have further sustainability benefits over the plan period.</p>
38	<p>The landbank calculations in paragraph 3.27 have been amended in light of the minerals calculation changes noted above. The minimum landbank has risen from 7.35mt to 7.63mt. The changes show that, as a result of this, further sites or extensions to existing sites with planning permission will now not be required until 2014; previously this had been 2015. Calculations have been inserted to clarify the total landbank required to 2026; this is noted to be 17.4mt, whereas before the methodology change this was 16.8mt. This also means that the additional provision required to 2026 has increased from 5.9mt to 6.5mt – a 10% increase.</p> <p>The wording regarding the method used by Buckinghamshire County Council to prevent the early release of sites has been altered.</p>	No	<p>The original SA Report recognised the need to meet the Government's minerals supply targets and required landbank. This is unlikely to result in a significant increase in the number of sites required above those envisaged in the original Core Strategy which was analysed by the SA Report. The number and sizes of the new minerals sites to be allocated will be determined in the forthcoming Minerals Local Plan; this change could impact upon this future work, but not upon the original SA Report.</p> <p>The wording alteration rephrases and clarifies the Council's method for preventing the early release of minerals sites and reflects the fact that the supply landbank is amended each year to take account of annual changes in demand. The new wording reflects the Council's continuing policy of phased release, emphasising that the Council does not permit sites to become active when sufficient existing sites are already operating to meet local supply requirements in conformity with national policy. The Council's policy of phased release was analysed in relation to SA objective SA12 in the original SA Report and noted to be a beneficial approach. The amended wording is therefore not considered to result in any change to the outcome of the original SA Report.</p>
39	The words "adequate and steady" added to "provision" in Policy CS4: 'Maintaining the Level of Sand and Gravel Provision'.	No	The addition of the words 'adequate and steady' only clarifies that a sufficient landbank will be maintained to meet Government requirements (annual supply requirement). This amendment does not change assumptions under the SA, and is therefore considered not to result in any change to the outcome of the original SA Report.
41	Clarification given as to when the Minerals Local Plan is to be produced and that it will include the identification of new	No	This information was known when the original SA report was developed and was taken into account in the development of the report. The amended wording is

No.	Amendment to the Core Strategy	Potential to Change SA Outcome	Reason
	minerals Preferred Areas.		therefore not considered to result in any change to the outcome of the original SA Report.
45	Wording added to point (c) of Policy CS5: Preferred Areas to cover the avoidance of adverse impacts on water resources and flood risk and ensuring that the Sequential Test is applied in relation to the identification of Preferred Areas for minerals extraction.	No	The new wording has positive implications which related to SA Objective 10 (water resources and water quality) and 11 (flood risk). However, it reflects the previous assumptions regarding national requirements, and as such, it would be unlikely to have an impact on the overall outcome of the SA.
47	Wording of Policy CS5 (f) in relation to considerations in relation to the identification of Preferred Areas for minerals extraction sites 'the avoidance of significant adverse impacts on internationally and nationally designated environmental assets' amended to 'the avoidance of likely significant effects on internationally and nationally designated environmental assets'.	No but for clarity, SA recommends further amendment.	<p>This change of wording could be read to potentially include the avoidance of likely <i>positive</i> significant effects, rather than just negative ones. This could therefore potentially have a negative impact on SA objectives in relation to national and internationally designated environmental assets.</p> <p>However, it is assumed that this is not the intention of the amendment, and that relative 'absurdity' of avoiding positive effects would not be implemented. Regardless, it is recommended that the word 'adverse' be included to read 'the avoidance of likely significant adverse effects on internationally and nationally designated environmental assets. This would ensure clarity and the original outcomes of the original SA report.</p>
49	<p>Additional wording added to Policy CS7: Rail Aggregate Depots and Wharf Facilities, and changes to supporting text.</p> <p>The new supporting text added to paragraph 3.47 recognises that only part of the Thorney Mill site was safeguarded under the previous Local Plan, rather than the entire site; the safeguarded area did not previously include the important rail sidings.</p> <p>The new text in Policy CS7 and paragraph 3.48 seeks to ensure a reduction in Heavy Goods Vehicle (HGV) movements entering and exiting the Thorney Mill site from 2012 levels. The addition of text seeking to reduce HGV movements entering and exiting the Thorney Mill site was inserted to address the current problem with significant HGV movements in the Iver area (where Thorney Mill is located), as was identified by South Bucks District Council as part of the Examination process.</p>	Yes	<p>The SA Report took into account that the rail siding at Thorney Mill, and thereby its ability to be used as a rail waste transfer facility, was not safeguarded under the former Local Plan (only the aggregates depot at the site was previously safeguarded). It is therefore considered that the amendment to the Core Strategy regarding the safeguarding of Thorney Mill would not result in any change to the outcome of the original SA Report.</p> <p>The sustainability problems being caused by HGV movements to/from the Thorney Mill site are not documented by the SA, and it can only be assumed therefore that the addition of text seeking to reduce HGV movements relate to certain SA objectives, including SA1 (air quality), SA2 (climate change), SA3 (living conditions and amenity), SA4 (human health and public safety), SA16 (minimising road journeys) and SA19 (economic impacts upon land and premises in employment use).</p> <p>However, given that the precise situation is not documented by the SA (including extent and location of sustainability problems), this is investigated further in Section 3 of this Addendum in case there are as yet unidentified risks and the</p>

No.	Amendment to the Core Strategy	Potential to Change SA Outcome	Reason
			outcomes require updating.
53 & 54	[SEE BELOW regarding proposed changes 59, 60, 61 & 63.]		
57	<p>Replacement in its entirety of Policy CS8: Waste Audit, which required the provision of a waste audit for major built developments and required all other development to have regard to waste minimisation, with new Policy CS8: Waste Prevention in New Development. The new policy seeks the efficient use of resources in development. It also encourages: the minimisation of primary aggregate use; the use of alternative materials; the reuse and recycling of materials (on-site where possible); and designs and layouts which allow the separation, recycling and storage of waste generated on site.</p> <p>Complete replacement of supporting text for Policy CS8, previously paragraphs 4.19 to 4.25, which covered waste prevention and waste auditing, with new supporting text in paragraphs 4.19 to 4.29, which cover similar issues plus additional issues such as officer training and waste minimisation through design.</p> <p>During the Examination process, the district councils within Buckinghamshire stated that there could be resource implications of implementing the waste audit policy, potentially making the policy undeliverable. The new wording forms an approach agreed between Buckinghamshire County Council and the district councils.</p>	Yes	<p>Although covering similar issues, the complete replacement of Policy CS8 and its supporting text has resulted in a different approach to waste minimisation being taken through plan policy although the objective of the policy remains. This could have ramifications for the analysis and therefore the outcome of the original SA Report.</p> <p>Although Site Waste Management Plans will, for the time being, still need to be produced for larger developments to meet other legal requirements, the policy change means that submission of a waste audit to the local planning authority will not be required. However, it should be noted that Defra is currently proposing to scrap the current requirement for Site Waste Management Plans to reduce costs for business, and particularly for the construction industry, as part of the Government's legislation streamlining agenda¹. This is recognised in the new wording inserted into the former paragraph 4.23 of the Core Strategy, which notes that further initiatives by local authorities may be required in this eventuality.</p> <p>To determine any potential impacts on the outcome of the original SA Report, the following sections of the SA will require review:</p> <ul style="list-style-type: none"> • Section 6: Effects of the Plan; and • Appendix G: Effects of the Plan.
53, 54, 59, 60, 61 &	The estimated baseline figure for 2009/10 for Commercial and Industrial (C&I) waste has been reduced by 29% (297,000 tonnes) from that shown in the original Core Strategy (721,000 tonnes, down from 1,018,000 tonnes).	No	The reduced C&I waste figures indicate a reduction in the amount of C&I waste predicted to be generated and which needs to be managed within the county, and therefore a reduction in the number and/or size of new or extended local recycling and composting facilities required. At the indicative level, this equates to some 21 fewer new recycling facilities and five fewer composting facilities than previously envisaged. However, the actual configuration and distribution will be

¹ Department for Environment, Food and Rural Affairs (DEFRA) (2012) *Red Tape Challenge – Environment Theme proposals*

No.	Amendment to the Core Strategy	Potential to Change SA Outcome	Reason
63	<p>Paragraph 4.13 has been amended to reduce the C&I waste projected for 2026 by 27% (348,000 tonnes). This is a reduction to 933,000 tonnes down from 1,281,000 tonnes).</p> <p>This is then broken down by disposal method, with: a 27% reduction (206,000 tonnes) in the amount of C&I waste that is predicted to need to be recycled (546,000 tonnes, down from 752,000 tonnes); a 27% reduction (23,000 tonnes) in the amount of C&I waste that is predicted to need to be composted (61,000 tonnes, down from 84,000 tonnes); a 27% reduction (67,000 tonnes) in the amount of C&I waste that is predicted to need to be sent for energy recovery (178,000 tonnes, down from 245,000 tonnes); and a 26% reduction (52,000 tonnes) in the amount of C&I waste needed to be disposed of to landfill (148,000 tonnes, down from 200,000 tonnes).</p> <p>These revised figures are summarised in an amended Table 2 of the supporting text for Policy CS9: Additional Waste Management Capacity and Net Self-Sufficiency.</p> <p>Paragraph 4.28 of the supporting text for Policy CS9 has been amended to show a 20% reduction, from the figures shown in the original Core Strategy, in the amount of additional waste management capacity needed in Buckinghamshire by 2026 – reduced from 1.25 million tonnes to nearly 1 million tonnes.</p> <p>The supporting text in paragraph 4.28 also shows a reduction of 37% (229,000 tonnes), from the original Core Strategy figures, in the amount of new MSW and C&I recycling and composting capacity (from 615,000 tonnes to 386,000 tonnes); a reduction of 19% (67,000 tonnes) in the amount of new energy recovery capacity (from 357,000 tonnes to 290,000 tonnes).</p>		<p>determined in the Waste Local Plan. This has obvious social, environmental and economic benefits, but despite the reduced figures, there will still be a significant increase in the overall number of new and extended facilities for recycling, composting and energy recovery required in the county, when considering waste of all types; this is what is reflected in the original SA report.</p> <p>The Core Strategy does not allocate any specific sites for recycling and composting, and therefore the SA report does not evaluate any sites for this use. Specific sites for new and/or extended recycling and composting will not be allocated until the production of the forthcoming Waste Local Plan; this change will, therefore, have an impact upon the number of facilities identified in that plan only for which a separate SA report will be produced.</p> <p>The Core Strategy proposes a single energy recovery facility at Calvert Landfill site (as part of a Strategic Waste Complex), with contingency provision now allowing alternative single or multi-site options. The assessment of the Calvert site in Appendix E of the SA report assumes that 360,000 tonnes of new energy recovery capacity will be provided on site; this has now been reduced to 290,000 tonnes, but this still remains a sizeable energy recovery facility, which is what the SA analysis envisages. The reduction in energy recovery capacity required over the plan period to 2026 makes it more likely that the new capacity could be provided on one site. It is also likely to result in a reduction in the number of associated vehicle movements, thus reducing associated social and environmental effects.</p> <p>In light of the above, the amendments to the C&I waste figures are considered not to result in any change to the outcome of the original SA Report as a significant increase in waste management capacity will still be required. The targets and growth assumptions remain the same – only the baseline has changed, having a knock-on effect on future projections.</p>

No.	Amendment to the Core Strategy	Potential to Change SA Outcome	Reason
	<p>No change is predicted to the amount of additional Construction and Demolition (C&D) waste recycling capacity required, nor to the amount of landfill required.</p> <p>These revised figures are further detailed in the tables contained in Policy CS9, which show a significant reduction in the amount of waste management capacity required for C&I waste, and therefore overall, from the figures shown in the original Core Strategy.</p>		
64	<p>Significant amendment to Policy CS10 regarding local recycling and composting capacity for Municipal Solid Waste (MSW) and Commercial and Industrial (C&I) waste, and to its supporting text in paragraphs 4.33 to 4.36. This change removes the 'indicative' district apportionments, which were to be finalised through the Waste Local Plan, and instead leaves the entire apportionment process to be determined by Buckinghamshire County Council working with the district councils in the county through the Waste Local Plan process.</p> <p>This change was made following concerns raised by the district councils regarding the methodology for calculating each district's apportionment, as there are several ways of apportioning waste such as jobs / employment for business-related capacity, whether population growth projections should be factored in, etc.</p>	Yes	<p>The principle of the policy was to distribute the waste facilities as far as possible in accordance to reflect waste arisings by population in each district (the amount of waste produced in each ward), although this is not explicitly stated in the policy wording or supporting text. The principle of the appropriate distribution facilities remains, although without the use of population as the specified methodology.</p> <p>Option 6 in Section 5.5.2 of the SA Report evaluates the option of distributing recycling and composting facilities according to population and recommends the option is carried forward to the Core Strategy, albeit with the final figures taking account of existing facilities in the calculations.</p> <p>The figures for each district will continue to be finalised as part of the Waste Local Plan. However, it is unclear from the change the extent to which the principle of distribution according to population will continue as this new distribution is developed. This could therefore have implications for the analysis and therefore the outcome of the original SA Report. It is open for the SA to suggest other potential methodologies for the distribution of new waste management facilities. The original SA Report included the recommendation that existing facilities within each district be taken into account in determining the future capacity required,</p> <p>To determine any potential impacts on the outcome of the original SA Report, the following sections of the SA will require review:</p> <ul style="list-style-type: none"> • Section 6: Effects of the Plan; and • Appendix G: Effects of the Plan. <p>This assessment will need to take account of the review of the relevant option in Section 5 of the report (Testing the Options / Alternatives) and Appendix F</p>

No.	Amendment to the Core Strategy	Potential to Change SA Outcome	Reason
			(Review of New Options).
66	Additional wording inserted into paragraph 4.38 acknowledging the outcomes of the Sequential Test, which showed that over 90% of the site was located within Flood Zone 1, providing sufficient developable area for a Strategic Waste Complex.	No BUT relevant text in the SA Report needs to be updated to take account of results of Sequential Test	The original Core Strategy and SA Report both acknowledged that there was sufficient land on the Calvert site within Flood Zone 1 for the development of a Strategic Waste Complex. The analysis of the Calvert site, detailed in Appendix E of the SA Report, only took account of the Environment Agency online flood risk maps and the completed Level 1 FRA in relation to the site, as the Sequential Test required by the Environment Agency for the site had not been completed (the Environment Agency deemed that a full Level 2 FRA was not required). Having since reviewed the Sequential Test, comparing it to the original SA Report on this issue, particularly Appendix E (Review of Calvert Proposals), it is clear that the statement made in the SA Report that there is sufficient developable land with Flood Zone 1 remains accurate. This will not, therefore, result in a change to the outcome of the original SA Report. The text of the SA Report does, however, need to be updated to acknowledge and reflect the new information contained in the Sequential Test.
69 & 126	Addition of the 'Woodham' site to the Waste Proposals Map and the overall Proposals Map	No	Woodham was included within the original Core Strategy as a contingency site, as it continues to be. It was also considered within the original SA Report. Its inclusion in the proposals map corrects an error in the map, but is not considered to result in any change to the outcome of the original SA Report.
70	Additional wording inserted into Policy CS11: Strategic Waste Complex at Calvert Landfill Site to: <ul style="list-style-type: none"> • Clarify that no single development at Calvert should be allowed to prevent co-location because this would inhibit moving waste up the Waste Hierarchy. • Ensure that development proposals demonstrate that they complement existing uses and the sustainability benefits of co-location. • Clarify that proposals for the Calvert site should demonstrate how they have considered using the rail link to transport waste to and / or from the site in order to minimise HGV movements. <p>An additional requirement for the establishment of a community liaison group has also been added.</p>	No	The changes serve to clarify and expand on issues covered within the original Core Strategy, by adding in detail previously contained in the Area Statement for Calvert. Their inclusion as policy would serve to give the issues covered by the additional wording more weight than they would have from just their inclusion in the Area Statement. Some positive benefits could result from a sustainability perspective. However, none of the changes, being mainly embellishments to existing policy wording, are of sufficient significance that they would result in a change in the outcome of original SA Report.
73	Amendments to the wording of Policy CS12: Essential	No	Amendments add to clarity of the policy wording, but do not change the overall

No.	Amendment to the Core Strategy	Potential to Change SA Outcome	Reason
	Infrastructure to support the Strategic Waste Complex (SWC) at Calvert Landfill Site, including re-ordering wording but not changing its content and inserting the word 'prevailing' in relation to national and flood risk policy.		sustainability implications. These amendments are therefore considered not to result in any change to the outcome of the original SA Report.
75	<p>Additional text inserted into Policy CS13: Contingency, linking it to Policy CS9: Additional Waste Management Capacity and Net Self-Sufficiency.</p> <p>This change enables facilities to be built in locations other the Calvert if insufficient capacity is built at the Calvert site, which is a change from the previous policy which assumed that all waste recovery capacity would be provided at Calvert, or at a contingency site(s), rather than only a proportion of the waste. The scenario of a smaller recovery facility being provided at Calvert, insufficient to meet all of the County's needs, was not covered by the previous policy wording.</p>	No	<p>Since the change is contingent on failure of the primary policy objective, and since it is also not location-specific and leads to decisions using a criteria-based policy, it is not possible to alter the overall SA outcome for the Core Strategy as a whole. This would be tantamount to choosing one scenario over another indiscriminately.</p> <p>The only way to address the potential effects of this policy change is to consider the management of key issues and of the risks of negative effects identified. This was done in large part during the review of options stage of the SA, as reported in Section 5 and Appendix D of the 2011 SA Report. The alternatives of relevance are 5A and 5B. This preferred option is clearly 5B, whose particular benefit the SA identified as being that it will allow all sites that might be suitable from a sustainability perspective to come forward at a later date. The recommendations of the SA have been clearly incorporated into Policy CS13, by way of reference to Section 5 (now Section 6) policies, including CS18, CS19, CS20, CS21, CS22 and CS23. The SA in particular sought to ensure that the avoidance and minimisation of site-based effects and transport-based effects (including minimising road transport distances) were incorporated into decision-making. It also sought to seek net enhancement, including green infrastructure.</p> <p>No further assessment is considered necessary, however SA monitoring needs to be conducted in order to enable appropriate response mechanisms should the effects of the Core Strategy not be occurring as predicted by the SA.</p>
82	<p>Amendments made to the wording of Policy CS14: Safeguarding Existing and Potential Waste Sites, including removing the provision that the Woodham contingency site should only be considered if the Calvert site does not come forward by 2015.</p> <p>Part of the criteria relating to Calvert was deleted as a result of concerns raised as part of the Examination Hearings that the wording could be interpreted as suggesting that all the waste capacity to be provided at Calvert would be provided at</p>	Yes – in part only	<p>The insufficient size of Woodham to provide the same waste management capacity as Calvert is already recognised in the SA Report, which acknowledges in Section 5.4.3 that the developable area at the Woodham site is too small for a full-size strategic waste complex. The SA report takes account of Woodham's future potential use for smaller-scale waste management purposes, as noted in Section 5.4.3. The revised wording in the Core Strategy regarding this issue is therefore a minor clarification and is considered not to have any impact upon the outcome of the original SA Report.</p> <p>The SA Report was developed with the assumption that only one site would be</p>

No.	Amendment to the Core Strategy	Potential to Change SA Outcome	Reason
	<p>Woodham if the Calvert site did not come forward for development.</p> <p>Amendments were also made to the supporting text in paragraph 4.69 in relation to Woodham to highlight that it only has the capacity for 'smaller-scale' waste management capacity.</p> <p>Wording has also been added to clarify that the Woodham site has also been safeguarded as it has potential to provide additional recycling and composting capacity under Policy CS10.</p> <p>Wording added to the policy to clarify that, while both the Richings Park and Thorney Mill sites are safeguarded, no more than one will be used for rail transfer purpose.</p> <p>Policy wording was also added requiring a reduction in HGV movements at Thorney Mill from the 2012 baseline. This was in response to concerns raised by South Bucks District Council regarding the significant HGV traffic in the Iver area where Thorney Mill is located.</p> <p>Also as a result of South Bucks District Council's concerns about HGV movements in the Iver area, new wording has been added to Policy CS14 requiring the provision of a new access road at Richings Park if the site were to be developed. A range of feasible potential route options has already been developed for Richings Park.</p> <p>New paragraphs 4.72 and 4.73 are to be inserted into the supporting text to the policy; this provides background to the current HGV movement problems at Thorney Mill and Richings Park and explains the need for the above policy amendments seeking a reduction in HGV movements and a new access road.</p>		<p>developed for rail transfer purposes, being in close proximity to each other; the added wording to this effect will therefore have no impact upon the outcome of the original SA Report.</p> <p>The amendment regarding Thorney Mill is likely to have a range of sustainability benefits. The review of this change for SA purposes will be captured by the assessment of proposed change 27 noted above.</p> <p>The amended wording regarding a new access road at Richings Park could have a range of potential social, environmental and economic effects, depending upon its eventual route. These could have an impact upon the outcome of the SA Report.</p> <p>To determine any potential impacts on the outcome of the original SA Report from the insertion of the new wording regarding a new access road for Richings Park, the following sections of the SA will require review against the identified potential route options for the road to evaluate potential effects:</p> <ul style="list-style-type: none"> • Section 6: Effects of the Plan • Appendix G: Effects of the Plan. <p>The amended wording regarding the maximising the use of rail / water access should have sustainability benefits in strengthening the wording, but should not have any overall impact on the outcome of the original SA report.</p>

No.	Amendment to the Core Strategy	Potential to Change SA Outcome	Reason
	Wording has also been added to Policy CS14 and the supporting text stating that 'maximum use should also be made of rail and canal access as part of any proposals for a rail / or water transfer facility'.		
83	The revised landfill capacity figures have led to the following amendment to paragraph 4.74: "The Council has calculated that if all diversion targets are achieved, available capacity for both waste streams is estimated by 2021 to be 8.6 8.2 million cubic metres [10.7 9.1 mt] and by 2026 4.8 4.4 million cubic metres [6.7 4.8 mt]. Additional inert landfill capacity will result from new mineral consents that will be granted in future to comply with the requirements of policy CS4 (whilst higher recycling rates from C&D wastes will also be achieved)."	No	There has only been a slight change in the overall capacity. This does not change the fact that there is sufficient landfill capacity in the county for the entire plan period.
84	Minor amendments to the wording of Policy CS15: Landfill to clarify the position with regard to inert material being used as fill for minerals excavation.	No	The new wording clarifies the wording of the policy with regard to the use of inert material as fill, but it does not change the principle of the policy from the original Core Strategy that no new landfill will be provided and that inert material can be used as fill for minerals excavations. These amendments are therefore considered not to result in any change to the outcome of the original SA Report.
97	Removal of the words 'need and' from the wording of Policy CS20: Green Belt to ensure that the policy complies with national policy regarding minerals development in the Green Belt.	No	The amendment only seeks to ensure that the Core Strategy, in common with the previous Local Plan, is in conformity with national policy regarding minerals development in the Green Belt. Other aspects of the Core Strategy deal with managing the amount of minerals development required in the county.
107	Additional wording inserted into subsection (c) of Policy CS22: Design and Climate Change requiring applicants to demonstrate that they are 'minimising the distance materials are transported by road', clarifying the existing requirement to transport them in a 'sustainable way'.	No	The additional wording provides further clarity as to the information required from the applicant to demonstrate that they are making sustainable transport choices, but it does not significantly change the overall impact of the policy. This amendment is therefore considered not to result in any change to the outcome of the original SA Report.
111	Additional wording inserted into Policy CS23: Enhancement of the Environment to add a feasibility exception to the policy. This amendment was made as a result of concerns raised by site operators that some enhancement measures could make projects economically unfeasible.	Yes, but limited to this screening report analysis	The options review undertaken as part of the SA process in relation to this policy option (detailed in Section 5.53 of the SA Report and Appendix F) recognised the need to take account of potential economic impact of providing such enhancements, but noted that this was covered in the policy wording through 'as relevant' and 'as appropriate'. The explicit consideration of feasibility only serves to clarify the above, and could clarify both cost and practicality issues.

No.	Amendment to the Core Strategy	Potential to Change SA Outcome	Reason
			<p>However, there is the potential for feasibility, without evidence, to be used as an unjustified excuse for not financing important enhancements that are in line with a range of Buckinghamshire policies, including the Biodiversity Action Plan, Rights of Way Improvement Plan and Green Infrastructure Strategy.</p> <p>In light of the above, the outcome of the SA Report is considered not to change, except with the addition of a recommendation that clear guidance be developed and published by Buckinghamshire County Council on the assessment of feasibility, either to be included within the Core Strategy supporting text, or as a separate supporting document that can be referred to during the planning application process.</p>
NP PF	<p>The Government requires that local planning policy should not repeat that in place at a national level. Buckinghamshire County Council therefore rely on national policy to cover several aspects of issues of relevance to sustainability, as recorded in the original SA Report. The new National Planning Policy Framework (NPPF), which replaced the majority of previous national planning policy, was only issued in March 2012, after publication of the original Core Strategy and accompanying SA Report; the effect of NPPF was therefore not considered in the original SA Report.</p>	Yes	<p>Although PPS10 regarding waste management is still in place at present, which is a key national planning policy of relevance to the Core Strategy, the majority of the remaining national planning policy considered in the SA Report has been replaced by the NPPF.</p> <p>To determine any potential impacts on the outcome of the original SA Report from the replacement of the majority of national planning policy with the NPPF, the majority of the SA Report and appendices will require assessment against the NPPF, but particularly the following sections:</p> <ul style="list-style-type: none"> • Section 6: Effects of the Plan • Section 7: Implementation and Monitoring • Appendix B: Review of Relevant Plans, Policies, Programmes and Initiatives and the supporting topic paper (in relation to changing national planning policy only) • Appendix G: Effects of the Plan.

In summary, the following proposed changes to the Core Strategy require further and more detailed review:

- Proposed change 3 – to evaluate whether and how removing the entire, rather than just part, of Local Plan Policies 13, 15, 17, 18, 19 and 30 would change the outcome of the original SA Report.
- Proposed change 22 – to document any modification to the SA compatibility appraisal of objectives (expected to be minor).
- Proposed change 49 – to evaluate the nature and extent of Heavy Goods Vehicle (HGV) issues as part of the baseline which supported the SA. If the baseline issues are significant, this could change the outcomes of the SA slightly, allowing the extent of potential benefits to also be documented correctly.
- Proposed change 57 – to evaluate whether and how the complete replacement of Policy CS8 would change the outcome of the original SA Report.
- Proposed change 64 – to evaluate whether and how the significant amendments made to Policy CS10 would change the outcome of the original SA Report.
- Proposed change 75 – to evaluate whether and how the potential for a multi-site waste recovery scenario would change the outcome of the original SA Report.
- Proposed change 82 – to evaluate whether and how the proposed provision of a new access road at Richings Park would change the outcome of the original SA Report.
- NPPF – to evaluate whether the replacement of the majority of national level planning policy with the National Planning Policy Framework (NPPF) would change the outcome of the original SA Report.

The following new recommendation in relation to proposed change 111 will also need to be carried forward: *clear guidance should be developed and published by Buckinghamshire County Council on the assessment of feasibility, either to be included within the Core Strategy supporting text, or as a separate supporting document that can be referred to during the planning application process.*

3.1 Proposed Change No. 3

The original SA Report of the Core Strategy assumed the partial replacement of the following Waste Local Plan (2004) policies:

- Local Plan Policy 13: *Recycling / Composting Facilities* – supported proposals for the development of materials recovery facilities, facilities to store and process recyclable materials and permanent (enclosed) composting plants where they would serve an identified need that could not be met by existing facilities. It set out criteria for non-enclosed (windrow) composting, and supported proposals for small-scale, community or agriculturally based composting facilities on agricultural land in proximity to the community or land that they were intended to serve.
- Local Plan Policy 15: *Waste Transfer Stations* – supported the development of suitable sites for new transfer and bulking stations at a range of scales, providing that they were intended to meet an identified need that could not be met by an existing facility. This included promoting waste transfer facilities at High Heavens near High Wycombe and at the London Road depot in Amersham, and also seeking to safeguard a site in the Richings Park area of South Buckinghamshire. Also the policy stated that the use of rail transport would be encouraged wherever possible, particularly to serve large facilities.
- Local Plan Policy 17: *Energy from Waste Plant* – supported proposals for incineration, pyrolysis or gasification plant (“energy from waste”) only as part of an integrated approach to waste management that would increase the recovery of materials, where: the need for the facility could be demonstrated; the proposed facility would operate to the highest pollution control standards; the site would be environmentally acceptable (having considered alternatives in detail); and the facility would include measures to recycle, compost and recover materials where this had not been carried out elsewhere. It aimed to incorporate combined generation and distribution of heat and power. It stated that proposals for incineration or other thermal waste process that did not include the recovery of energy would not normally be permitted.
- Local Plan Policy 18: *Landfill and Landraising* – stated that the Council would provide for a continuing but declining landfill capacity within the county over the plan period to serve local and regional needs, and seek to husband void space within engineered landfill sites and ensure that they were primarily used for the disposal of residual treated non-inert waste. It stated that permission would not be granted for land-raising using either inert or non-inert waste unless the gain in benefits would be sufficient to outweigh harm arising from the proposal.
- Local Plan Policy 19: *Calvert Landfill Site* – supported proposals to ensure that any long-term environmental impacts at Calvert Landfill Site were satisfactorily controlled, and also to ensure the long-term restoration of the site, covering a range of issues.
- Local Plan Policy 30: *Proximity Principle and Sustainable Transport* – required that for all proposals, due regard had been paid to the need to minimise any adverse transport impacts. In addition, it required that all

proposals for waste management development abided by the proximity principle. It sought the use of rail, waterways, conveyors or pipelines in preference to the use of roads for the transport of bulk materials, but requiring that proposals demonstrate that alternative means of transport to roads were considered and would be used where practicable. It required that where a proposal could only be served by road, they would only be permitted where the material is capable of being transported to and from sites by the strategic highway network. The impacts from, and potential requirement for upgrades to, access roads had to be considered.

Due to the above policies being replaced, it is essential to establish the material changes being made, as summarised in Table 3.1 below.

Table 3.1: Review of Fully Replaced Local Plan Policies

Local Plan Policy	Replacement Core Strategy Policy/ies	What Remains the Same	MWCS Policy Changes	Impacts on the SA?
13	CS10: Indicative Local Recycling and Composting Capacity to be provided for MSW and C&I waste by 2026	<ul style="list-style-type: none"> • supports proposals for waste recovery, recycling and composting • potential for small/local-scale, community composting in rural areas 	<ul style="list-style-type: none"> • takes a more proactive approach to identifying the need for facilities, but recognises that market forces will also help prevent over-provision (better balance at present) • criteria for non-enclosed (windrow) composting expanded to any rural area (subject to other policy requirements) • more detail to come in the Waste Local Plan 	<p>No – there does not appear to be any remaining element of Local Plan Policy 13 which the SA relied upon for its outcomes.</p> <p>Proposals for windrow composting are no longer constrained to existing waste management sites. Concerns for windrow composting include bioaerosols, odour and vermin. However, all proposals regardless of location must comply with sustainability policies, including saved Local Plan Policy 28 which directly addresses all of these issues, and also CS22. Waste management licensing is a requirement on all operators which provides the most essential protection.</p>
15	CS10 (as above) CS12: Essential Infrastructure to support the Strategic Waste Complex (SWC) at Calvert Landfill Site	<ul style="list-style-type: none"> • requires waste transfer facilities at High Heavens and London Road depot in advance of the Strategic Waste Complex at Calvert 	<ul style="list-style-type: none"> • support for ‘transfer and bulking stations at a range of scales’ replaced with specific sites • only one of either Richings Park or Thorney Mill, Iver, will be used for rail transfer 	<p>No – there does not appear to be any remaining element of Local Plan Policy 15 which the SA relied upon for its outcomes. All was already understood to be replaced.</p>

Local Plan Policy	Replacement Core Strategy Policy/ies	What Remains the Same	MWCS Policy Changes	Impacts on the SA?
	CS14: Safeguarding Existing and Potential Waste Sites	<ul style="list-style-type: none"> the Richings Park site is safeguarded use of rail still encouraged 	<ul style="list-style-type: none"> potential for rail linked more specifically to the identified sites 	
17	CS11: Strategic Waste Complex at Calvert Landfill Site CS13: Contingency	<ul style="list-style-type: none"> supports proposals for energy recovery as part of an integrated approach to waste management no significant risk of pollution permissible environmental acceptability must still be demonstrated via other policies 	<ul style="list-style-type: none"> after a site selection process, Calvert identified as the location for the Strategic Waste Complex supplying energy from waste capacity more information is available which demonstrates the need for development including measures to recycle, compost and recover materials no longer required, but encouraged more detailed requirement for combined generation and distribution of heat and power 	No – there does not appear to be any remaining element of Local Plan Policy 17 which the SA relied upon for its outcomes. All was already understood to be replaced.
18	CS15: Landfill	<ul style="list-style-type: none"> overall policy will ensure that land-raising using either inert or non-inert waste will have a gain in benefits sufficient to outweigh any harm 	<ul style="list-style-type: none"> No additional landfill capacity for non-hazardous and inert waste will be provided 	No – there does not appear to be any remaining element of Local Plan Policy 18 which the SA relied upon for its outcomes. All was already understood to be replaced.
19	CS11 (as above) CS12 (as above) CS19: Protection of Environmental Assets of Local	<ul style="list-style-type: none"> supports mitigation measures at the Calvert Landfill Site 	<ul style="list-style-type: none"> specific measures identified, including a new access linking the site to the A41 restoration covered under saved Local Plan policy 31 	No – there does not appear to be any remaining element of Local Plan Policy 19 which the SA relied upon for its outcomes. All was already understood to be replaced.

Local Plan Policy	Replacement Core Strategy Policy/ies	What Remains the Same	MWCS Policy Changes	Impacts on the SA?
	Importance			
30	CS7: Rail Aggregate Depots and Wharf Facilities CS22: Design and Climate Change	<ul style="list-style-type: none"> requires demonstration of minimised transport impacts the <i>de facto</i> proximity principle still applies supports alternative sustainable transport modes 	<ul style="list-style-type: none"> stronger requirement to minimise road transport distances for all proposals proposals no longer only permitted where transport is only by the strategic highway network, however this is implicit in minimising impacts 	No – there does not appear to be any remaining element of Local Plan Policy 19 which the SA relied upon for its outcomes. All was already understood to be replaced.

3.2 Proposed Change No. 22

Section 4 of the SA Report (2011) includes the testing of the objectives of the Preferred Options version of the Core Strategy against the SA objectives. Strategic Objective 9: *Protection of the Green Belt and AONB* used to say:

To protect the Green Belt and the Chilterns AONB within Buckinghamshire from unnecessary minerals and waste development.

The phrasing is now changed from “unnecessary” minerals and waste development to protected from “inappropriate” minerals and waste development. This has a completely different meaning, as ‘unnecessary development’ implies a test of need for each development proposal. The word ‘inappropriate’ no longer implies this test, and therefore the Core Strategy objective is only considering the appropriateness with regard to the Green Belt and AONB.

The original SA outcomes for Objective 9, or Strategic Objective 9 (SO9), should therefore be altered to that indicated in Table 3.2 below. This appraisal had originally (in 2011) considered that the ‘test of need’ could lead to a blinkered approach towards minerals and waste site allocation and development, whereby rural areas and the AONB would be avoided even if such locations were to present the most sustainable outcomes. This could have led to sustainable developments in the AONB or Green Belt being avoided, and therefore more pressure on the existing sites and infrastructure to cope with minerals and waste management into the long-term future.

However, as can be seen in Table 3.2, the revised wording has quite an effect on the compatibility appraisal, leading to a much more positive objective.

Table 3.2: Re-Testing of Objective 9 Against the SA Objectives

Key	
✓	Compatible
N	Neutral / No relationship
x	Potential conflict

SA Objective	Original Compatibility Score	Original Rationale	New Compatibility Score	New Rationale
SA1. Air quality	x	SO9 is potentially incompatible with SA1 as by preventing development in substantial designated sites, this may force sites to be located beyond and increase transport distances and emissions.	N	SO9 is no longer related to where developments may be located, and only to how they may be designed. It is considered unlikely to influence types of development such that it restricts technology or operation, though it may lead to a need for greater innovation for certain developments.
SA2. Climate change	x	As directly above, this may force sites to be located beyond and increase transport distances and emissions.	N	As directly above.
SA3. Living conditions and amenities	✓/x	Depends on how SO9 is implemented, but could restrict minerals and waste management to existing developed land perhaps disproportionately close to urban areas, which in turn may be affected by other developments in the future (cumulative effects).	✓	As for SA1, no longer related to where developments may be located. The remaining influence is positive, as SO9 aims to protect valuable countryside and landscapes.
SA4. Human health and public safety	✓/x	As directly above, particularly as relates to cumulative issues of disturbance, noise and transport.	✓	As directly above. Compatible, and possibly significant to measured degrees of health.
SA5. Biodiversity	✓/x	Depends on how SO9 is implemented, but could lead to some prioritisation of landscape and amenity over ecologically sensitive areas.	✓	Guiding for development appropriate to the AONB landscape or purposes of the Green Belt may contribute towards protecting biodiversity, where their objectives align. It is unlikely to lead to significant additional conflicts from what may have already occurred from any new development.

SA Objective	Original Compatibility Score	Original Rationale	New Compatibility Score	New Rationale
SA6. Archaeology and the historic environment	x	The protection of the green belt and AONB could put cumulative pressure on built areas where there is a greater extent of history of human activity.	N	SO9 is no longer related to where developments may be located, and only to how they may be designed.
SA7. Soils and geology	✓/x ²	Depends on how SO9 is implemented, but could lead to some prioritisation of landscape and amenity over geodiversity sensitive areas.	N	SO9 is no longer related to where developments may be located, and only to how they may be designed.
SA8. Landscapes and townscapes	✓	SO9 seeks to protect the countryside and AONB. (This could be said to be in error, as previously SO9 could have directed minerals and waste management activity towards sensitive townscapes.)	✓	No change.
SA9. Natural resource use	N	No significant relationship.	N	No change.
SA10. Water	✓/x	Depends on how SO9 is implemented, but could lead to some prioritisation of landscape and amenity over sensitive water bodies.	✓	As for SA5, resulting actions may contribute towards protecting the water environment, where this aligns with objectives for the AONB or the Green Belt. It is unlikely to lead to significant additional conflicts from what may have already occurred from any new development.
SA11. Flood risk	N	Neutral, given the sequential test and other policy.	N	No significant relationship.
SA12. Mineral resources	✓/x	Depends on how SO9 is implemented, but could lead to some prioritisation of landscape and amenity over minerals safeguarding.	N	SO9 is no longer related to where developments may be located, and only to how they may be designed.
SA13. Restoration and after use	N	Neutral on restoration and after-use.	N	No change.

² This was indicated as being 'compatible' in the original SA Report, however this was in error.

SA Objective	Original Compatibility Score	Original Rationale	New Compatibility Score	New Rationale
SA14. Sustainable management of waste and minerals	✓	Could be seen to avoid unnecessary new development altogether, which is a sustainable outcome.	N	No significant relationship.
SA15. Energy	N	No significant relationship.	N	No change.
SA16. Road journeys	✓/✗	By preventing development in substantial designated sites, this may force sites to be located beyond and increase transport distances and emissions.	N	SO9 is no longer related to where developments may be located, and only to how they may be designed.
SA17. Community participation and individual responsibility	N	Strategic objectives are mainly neutral with regard to SA17.	N	No change.
SA18. Recreation	✓	SO9 seeks to protect the countryside and AONB. (This could be said to be in error, as previously SO9 could have directed minerals and waste management activity towards more intensively used recreational facilities near urban areas.)	✓	No change.
SA19. Land and premises in employment use	✓/✗	Depends on how SO9 is implemented, but could lead to some prioritisation of landscape and amenity over conflicts with existing employment land.	N	SO9 is no longer related to where developments may be located, and only to how they may be designed.
SA20. Job opportunities	N	No significant relationship.	N	No change.

3.3 Proposed Change No. 49

The sustainability problems being caused by HGV movements to/from the Thorney Mill site were not documented by the original SA Report. The following should be added to the Spatial Context Topic Paper (No.7) which contains the baseline used for the SA. It is relevant to topics including Transport Links and Air Quality.

Baseline

The Thorney Mill site in Iver is also known as the Bardon / Aggregate Industries site, and is located at the eastern end of Thorney Mill Road near to West Drayton. It lies along a southern spur from the Great Western Main Line (GWML) east-west line between Slough and London. Its current primary use is in haulage of aggregate and

road construction materials. Other users of the Thorney Mill site include a recycling and scrap metal yard (Buckinghamshire CC, 2010).

The site suffers from cumulative road transport issues with at least three other commercial / industrial land uses in the area. The HGVs travelling to and from all four sites have limited routing options, with all of the HGV traffic having to travel either along Iver High Street when heading north, or through Richings Park when heading south. This causes localised environmental and amenity issues. This is of considerable concern to local residents. Whilst the road safety data does not show a particularly high rate of HGV-related incidents in the area, the width of the road and narrow pavements in parts of Iver Village increase the risk and perception of conflict amongst HGVs, cyclists and pedestrians (Buckinghamshire CC, 2010).

SA Assessment

The new text in Policy CS7 and paragraph 3.48 of the Core Strategy seeks to ensure a reduction in HGV movements entering and exiting the Thorney Mill site from 2012 levels. It also requires a new access for the Richings Park site to avoid impacts on the Iver and Richings Park communities. The following have been reviewed for the original SA Report, under Section 6 (Table 6.1) and Appendix G: *Effects of the Plan*:

- SA1: To protect and enhance air quality – **no change to assessment result**. As the 2012 baseline for the Thorney Mill site has not yet been established, it is unclear what level of reduction in HGV movements will be required. The future, long-term baseline is also uncertain (in terms of road transport emissions from all road users and extent of Air Quality Management Areas [AQMAs]), and therefore the air quality effects of the Thorney Mill and Richings Park sites cannot be accurately predicted. Countywide HGV movements which traverse AQMAs may be increased or decreased at different locations, depending upon the extent to which the developments consolidate other, previously required HGV movements and achieve modal shift to rail and/or water.
- SA2: To avoid additional climate change emissions, seek their reduction, and reduce the future effects of climate change based on predictions – **no change to assessment result**. The SA predicts major benefits to emissions from the Core Strategy, and any effect of HGV emissions these two sites are expected to, by and large, be masked by other effects. However, it is again noted that as the 2012 baseline for the Thorney Mill site has not yet been established, it is unclear what level of reduction in HGV movements will be required.
- SA3: To protect the living conditions and amenities of local residents and people working in local businesses from the adverse effects of minerals and/or waste development, and seek enhancements where possible – **no change to assessment result**. The SA Report had already assumed that such mitigation might be put in place in association with Policy CS22 and saved Local Plan Policy 28. The new requirements could be considered a clarification and early manifestation of these 'higher-level' policies.
- SA4: To avoid adverse impacts on human health and ensure public safety with regard to minerals and waste activities, seeking positive benefits where possible – **no change to assessment result**. As above for SA3.
- SA16: To minimise the number and length of road journeys associated with waste management facilities and minerals workings – **no change to**

assessment result. Similar to SA2, the overriding effect of the Core Strategy is of regional transport benefits. However, this policy change would certainly make a contribution towards the significant benefit already identified, though this is not considered to change the overall assessment score.

- SA19: To avoid adverse economic impacts on land and premises in employment use and seek to benefit such businesses where possible – **no change to assessment result.** The assurance of controls to road transport impacts reinforces the assumption that Core Strategy policies will prevent effects to other business uses near to waste management developments. It is assumed that the new access road to the Richings Park site will avoid any net negative impact on local businesses, and even has the potential to provide a contribution to their operations, depending upon any shared use of the access road.

Given the above considerations, there is no change to the original SA outcome as a result of this policy change. In order to address potential cumulative effects and also seek net benefits, it is recommended that Buckinghamshire County Council seek to join the Richings Park site development with other initiatives and development proposals where possible to deliver a relief road for the Iver and Richings Park area, in accordance with the options put forward by the Council's own Transport Paper – see 'References' section: Buckinghamshire CC, 2010.

It is recognised that the Richings Park site can secure suitable access without the full relief road. Likewise, the need for such a relief road regarding HGVs may be driven more by the expansion of businesses on existing sites, rather than new developments. At present, for existing developed and operational sites, there is little link between operational environmental permitting and cumulative increases in transport volume and impacts. However, the regulators may identify such issues and encourage them to be actioned. In addition, existing businesses may volunteer funding either out of goodwill towards the community, or in order to achieve operational efficiencies including time and cost savings. Partnership approaches such as this should be encouraged.

3.4 Proposed Change No. 57

It is unlikely that this change would significantly change the SA assessment outcomes, in particular the predicted overall assessment score under SA9: 'To avoid the wasteful use of natural resources and to encourage the use of alternatives to primary materials'. The key issue for this change is whether or not the policy changes replace what would have been considered and potentially achieved through Site Waste Management Plans (SWMPs).

NetRegs³ (2011) produced a simple guide to SWMPs, which included a range of steps. Within these are some key issues which are compared against the revised Core Strategy text and policy below:

- Designing sustainable waste management into development at the design stage: incorporated into Policy CS8 and supporting text (✓);

³ NetRegs is sponsored by the Environment Agency in England (and other UK environmental authorities) and supplies free environmental guidance for businesses, including ways to achieve resource efficiency and guidance on compliance with environmental law and protection of the environment

- Allocating responsibility for the SWMP: transfer of responsibility does not apply to planning application stage, however it would presumably pass to planning enforcement via the Core Strategy and future Waste Local Plan policies (✓?);
- Identifying the types and quantities of waste through every stage of the project: Policy CS8 and supporting text consider these factors through in particular design, construction and operation (✓);
- Identifying how to manage the waste: The Waste and Resources Action Programme (WRAP) identifies five key principles for SWMPs:
 - Design for Reuse and Recovery: reference to ‘use of alternative materials’ in Policy CS8 has a logical association with and inference to ‘recovery’ in this instance (✓);
 - Design for Off-Site Construction: this aspect is to do with pre-manufacture or pre-construction of components off-site. Reference to construction methods in Policy CS8 and supporting text are considered to cover this (✓);
 - Design for Materials Optimisation: reducing material consumption included in the supporting text, and inherent in Policy CS8 in reducing raw material consumption (✓);
 - Design for Waste-Efficient Procurement: this aspect is to do with the process of using suppliers and understanding their waste production. The provisions of Policy CS8 are considered to infiltrate supply chains, with the supporting text addressing efficiencies in handling materials and waste (✓).
 - Design for Deconstruction and Flexibility: this addresses the operational life and end of life for a project. This is addressed through the supporting text to Policy CS8, and operation is mentioned in the policy itself (✓?) (WRAP, 2012).
- Identifying where and how to dispose of waste: this is largely a regulated activity, and therefore not relevant to planning policy (N/A);
- Organising materials and waste: reference to construction methods in Policy CS8 and supporting text are considered to cover this, and also relevant is the design and layout which enables waste separation, recycling and storage (✓).

Given the above, the SA finds that the Core Strategy changes are generally comprehensive enough to address the potential loss of waste audits and SWMPs. However, the SA recommends that Policy CS8 is strengthened by requiring that proposals “seek to utilise the efficient use of resources in its design, construction, and operation *and deconstruction / demolition*”.

3.5 Proposed Change No. 64

Various assessments within the SA Report of 2011 are reliant upon the assumption that recycling and composting facilities would be distributed by each district based upon waste arisings to district population. The Core Strategy changes now defer the distribution methodology and location of new local recycling and composting capacity throughout the county to the future Waste Local Plan.

The SA therefore assumes that the principle of apportioning capacity requirements for recycling and composting facilities will occur using a more robust method of

including the 'proximity principle', and minimising the distances over which waste is transported.

A review of other waste planning policy has identified some factors which may be taken into account:

- Gloucestershire: recycling and composting facilities dealt with by a criteria-based policy, however 'strategic' scale facilities defined as those dealing with more than 50,000 tonnes of waste per year, and required to be within a specified zone which includes the two largest urban centres and the majority of the county's main transport infrastructure in order to increase the potential for use of sustainable modes of transport (Gloucestershire County Council, 2011);
- Hertfordshire: the pre-submission Core Strategy has a spatial strategy for additional facilities based on 'areas of search', which are mainly established by key settlements and transport infrastructure (Hertfordshire County Council, 2010);
- Norfolk: generally, waste management will be apportioned *by settlement type/size and then a mix of other attributes on a proposal-by-proposal basis*. 'Strategic' / 'major' waste sites (either significant size – an indicative minimum threshold of 10,000 tonnes annual throughput – or importance) will be concentrated in the county's larger settlements. Non-strategic sites will be focused on main market towns, and there may be more rural sites which have strategic benefit (e.g. by reason of the road network, serving settlements across the county boundary, or reusing rural brownfield sites) (Norfolk County Council, 2012);
- Peak District National Park Authority: although this example was in a National Park, it identified that *a small and dispersed population means that new waste management facilities would not be viable operations unless waste is imported* (Peak District National Park Authority, 2010). It should therefore be noted that apportionment by population in certain circumstances could lead to reduced success in implementation or a less sustainable outcome; and
- Peak District National Park Authority: also identified that *areas of high sensitivity to landscape impacts may not be appropriate for specialised processing sites such as commercial composting and recycling plants* (Peak District National Park Authority, 2010). Such considerations may be considered to apply to Areas of Outstanding Natural Beauty (AONB), as well.

It must be recognised that local circumstances influence the precise approach taken, including existing waste management capacity and the strategic direction of the Local Plan. As a result of the above and similar considerations, suggested factors to consider taking into account for the distribution of waste recycling and composting facilities around Buckinghamshire are:

- gaps in provision and areas of low performance for recycling and composting;
- proximity to centres of population, economic activity and planned growth;
- availability of suitable transport infrastructure, particularly for achieving modal shift;

- serving a cross-boundary catchment / market, and viability of facilities on that basis;
- brownfield land in the countryside;
- the need for 'strategic' recycling or composting facilities, and how this may be defined;
- how smaller facilities may serve any 'strategic' facilities, and associated transport links; and
- the Chilterns AONB relative to specialised processing sites such as commercial composting and recycling plants.

3.6 Proposed Change No. 82

Proposed change No.82 includes a few different changes, but only one has been identified as having the potential to alter the SA is the amended wording regarding a new access road at Richings Park. There is also amended wording regarding the maximisation of freight transport by rail and water. This proposed change has links with proposed change No.49 addressed in Section 3.3 above.

The SA Report was necessarily conditional upon such mitigation being put in place. For example, under SA1 relating to air quality, the SA Report stated, "Transport-related emissions would also depend upon the location of the sites chosen and the subsequent routes adopted." Similarly, under SA3 regarding living conditions and amenity, the SA Report stated, "Localised impacts on living conditions and amenity will depend on the existing baseline at the actual sites chosen. ... Transport-related impacts would also depend upon the location of the sites chosen and the subsequent routes adopted."

Regardless of the localised impacts discussed above, the overall, or average, effect of the Core Strategy would remain as predicted in the SA Report, being significantly positive to SA1 and SA3 (amongst other SA Objectives). The additional provision of a new access road is in line with assumptions made by the SA, and therefore this also does not alter the predictions of the SA Report. The environmental constraints in the area of the Richings Park site do not raise additional concerns beyond those already raised in the SA Report.

An access road connecting into the Richings Park site would require detailed project appraisal, and assumptions about the nature of the project or the design cannot be made at this stage. As stated in Section 3.3 above, it is recommended that Buckinghamshire County Council seek net benefits from development given the historic issues in the area. It could seek to join the Richings Park site development with other initiatives and development proposals where possible to deliver a relief road for the Iver and Richings Park area, in accordance with the options put forward by the Council's own Transport Paper – see 'References' section: Buckinghamshire CC, 2010.

Again, it is recognised that the Richings Park site can secure suitable access without the full relief road. See Section 3.3 for the remaining recommendation.

3.7 NPPF: Review of SA's Reliance on Superseded Planning Policy

The SA Report includes a review of relevant plans, policies, programmes and initiatives (Appendix B of the 2011 SA Report) which includes the superseded Planning Policy Statements (PPS) and Planning Policy Guidance (PPG). The full

review is contained in the 'Other Plans, Policies, Programmes and Initiatives Topic Paper' (Topic Paper 3). This review has served a function in informing development of the Core Strategy and the SA, and can be considered historic. The Council has reviewed the Core Strategy against the NPPF separately, and made amendments where required (and which have been subject to SA in this Addendum).

It is considered that the new National Planning Policy Framework (NPPF) preserves the core requirements of achieving sustainability and addressing significant receptors under each of the SA Objectives and topics, and therefore the SA does not require specific amendment. Future SAs should include revised planning policy reviews which remove reference to superseded national policy, and consolidate the review by reference to the NPPF and its requirements.

The SA Report directly relies on the former national planning policy statements and guidance in the following ways:

- SA Objective 11: *To avoid increasing and, where possible, reduce flood risk includes 'Decision-Making Criterion' C: Is the proposed use suitable in the flood zone of the site according to Planning Policy Statement (PPS) 25?;*
- Assumed construction control: *'Planning permission will be subject to archaeological evaluation in accordance with PPS5'; and*
- Assumed construction control: *'Planning permission will require application of PPS25'.*

Regarding PPS25 and flood risk, the NPPF preserves the sequential test and exception test, and more generally requires that *'Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere'* (DCLG, 2012, p.23). Specific provisions include proper and thorough planning for flood risk, including that if development within a flood risk area is permitted, there are appropriate safeguards. This would apply during construction as well as operation, and therefore this is not considered a material change to the SA.

Regarding PPS5 and archaeology, the NPPF requires that local authorities apply their historic environment records in order to predict the likelihood of encountering undiscovered, buried archaeology. It also requires that *'where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.'* Furthermore, it requires that *'Non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets'* (DCLG, 2012, p.30 & 32). Combined with guidance and best practice on conservation, this is not considered a material change to the SA, with construction controls remaining in place.

It is noted that both the Core Strategy and SA Report rely on PPS10, which is still in effect until the new National Waste Strategy and an annex to the NPPF to replace PPS10 are prepared and adopted. Regardless, the SA Report only relies on PPS10 either as a reference to criteria (e.g. for selecting strategic sites), or in-so-far as the Core Strategy itself does for policy direction. It remains the case that changes or revisions to the Core Strategy may require further SA. Otherwise, reference in the SA to criteria in PPS10 should be adhered to unless the SA itself is reviewed, regardless of whether PPS10 remains in effect. These criteria are likely to have

other national or local equivalents, and so substitution can be made on a like-for-like basis, once PPS10 is superseded by revised national policy. The SA Report even recognises that these criteria are not comprehensive, and further criteria are likely required in the future Waste Local Plan.

This Addendum has considered in detail the proposed changes which could have had an effect on the outcomes of the SA Report. Section 3 concludes that no changes to the overall assessment are required, other than minor amendment to the compatibility appraisal of Core Strategy strategic objectives. The following lists the places in the 2011 SA Report where changes should be recognised:

- Throughout – references to distribution of recycling and composting facilities “by population” or “by each district’s population” to be changed to “including proximity to waste generated”, including Section 5.5.2, Appendix F and Appendix G;
- Section 4.2: *Testing the Plan Objectives* – replace the appraisal of SO9 with that presented in the right-most columns of Table 3.2 of this Addendum;
- Section 6: *Effects of the Plan* – incorporate the living conditions and amenity issues experienced at Iver and Richings Park under SA3, and incorporate how policy addresses this issue as discussed in Sections 3.3 and 3.6 of this Addendum. Cross-refer to this issue for SA4, SA16 and SA19;
- Appendix B: *Review of Relevant Plans, Policies, Programmes and Initiatives* – further emphasise that this review is a historic part of the Core Strategy and SA development process, and that the Core Strategy has been compared against the NPPF in order to ensure consistency with revised national policy;
- Appendix G: under sub-section ‘Policy Baseline’ – deletion of “(part only)” for ‘saved’ policies 13, 15, 17, 18, 19 and 30; and
- Appendix G: assessment under SA9 – alter the text to focus on the specific provisions of the policy, rather than on site waste management plans themselves, in case they are no longer required in the future.

The SA suggests an additional amendment to the Core Strategy, being that Policy CS8 is strengthened by requiring that proposals “seek to utilise the efficient use of resources in its design, construction, ~~and~~ operation *and deconstruction / demolition*”.

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