

# **Sustainability Appraisal/ Strategic Environmental Assessment of the Wiltshire and Swindon Waste Site Allocations Local Plan**

## **Pre-Submission Sustainability Appraisal Report Addendum**

**August 2012**

**Enfusion** *in association with*  
**Centre for Sustainability at TRL**

enfusion 

**C4S**

# Sustainability Appraisal/ Strategic Environmental Assessment of the Wiltshire and Swindon Waste Site Allocations Local Plan

## Pre-Submission

### Sustainability Appraisal Report Addendum

August 2012

Prepared for: Wiltshire Council and Swindon Borough Council

<i>date:</i>	August 2012	
<i>prepared for:</i>	Wiltshire Council and Swindon Borough Council	
<i>prepared by:</i>	Alastair Peattie Toney Hallahan	Enfusion Enfusion
<i>quality assurance:</i>	Toney Hallahan Rob Gardner	Enfusion C4S



enfusion

environmental planning and management for sustainability

Treenwood House  
Rowden Lane  
Bradford on Avon  
BA15 2AU

t: 01225 867112

[www.enfusion.co.uk](http://www.enfusion.co.uk)

**SUSTAINABILITY APPRAISAL / STRATEGIC ENVIRONMENTAL  
ASSESSMENT of the  
Wiltshire & Swindon Waste Site Allocations Local Plan**

<b>Contents</b>		<b>Page</b>
<b>1</b>	<b>Introduction</b>	<b>1</b>
<b>2</b>	<b>Changes to the Plan</b>	<b>2</b>
	Bridging Schedule of Changes	2
	Schedule of Main Modifications	3
	Schedule of Additional Changes	3
	Removal of Site S3 'Employment Allocation , Mere'	3
<b>3</b>	<b>How do the changes affect the findings of the Pre-Submission SA Report (April 2011)</b>	<b>4</b>
	Bridging Schedule of Changes	4
	Schedule of Main Modifications	8
	Schedule of Additional Changes	9
	Removal of Site S3 'Employment Allocation , Mere'	9
<b>4</b>	<b>Conclusion</b>	<b>9</b>

## 1.0 INTRODUCTION

- 1.1 Wiltshire Council and Swindon Borough Council ('the Councils') Pre-submission draft - Waste Site Allocations Development Plan Document (now Local Plan) was published for public consultation in June 2011 for an eight week period. It was accompanied by a Sustainability Appraisal Report produced by consultants, Enfusion Ltd. The Councils have since submitted the Waste Site Allocations plan to the Secretary of State on 14<sup>th</sup> February 2012 for the purpose of initiating the independent examination. The hearing sessions on the 'soundness' of the plan took place between 24<sup>th</sup> and 26<sup>th</sup> April 2012. Following the hearing sessions the Councils published three schedules for a six week consultation period from Thursday 07<sup>th</sup> June - Thursday 19<sup>th</sup> July 2012 to give interested parties the opportunity to comment before the inspector completes her report. The schedules are outlined below along with a brief description:
- **Bridging Schedule of Changes** - Prior to submitting the document in February 2012, the Councils amended the plan to reflect comments received during the consultation on the Pre-Submission version during the summer of 2011. On the basis that the changes included the removal of eight sites, prior to the examination hearing sessions the Inspector requested that the Councils produce a schedule of changes made between the Pre-Submission (June 2011) and Submission (February 2012) version of the plan. This schedule was used to 'bridge' the gap between the two versions of the plan and meant that the latest version of the plan could form the starting point for the examination.
  - **Schedule of Main Modifications** - Session 1, Matter 2 of the independent examination, held on 24<sup>th</sup> April 2012 discussed potential main modifications which would be needed to make the document 'sound'. The Councils made a formal request under section 20 (7C) of the Planning and Compulsory Purchase Act 2004 (as amended) asking the Inspector to amend the plan in line with the Schedule of Main Modifications that emanated from the hearing sessions. The Schedule of Main Modifications contains the changes which must be considered by the Inspector.
  - **Schedule of Additional Changes** - Following the examination hearing sessions, the Councils have also produced a Schedule of Additional Changes. These are modifications that, taken together, do not materially affect the policies set out in the plan and as such do not need to be considered by the Inspector or subject to public consultation but can be made by the Councils on adoption of the plan.
- 1.2 During the consultation on the three schedules, the landowner of site S3 'Employment Allocation, Mere' withdrew consent for the site to be included in the plan. Without landowner consent, the site is considered at this stage to be undeliverable and therefore the Councils propose to remove the site from the plan.
- 1.3 The SA/SEA of the Wiltshire and Swindon Waste Development Plan has been an iterative and ongoing process since 2005. In keeping with this, it is necessary to consider the changes made to the Waste Site Allocations Local Plan since the publication of the Pre-Submission version of the plan in June 2011. To accompany the Waste Site Allocations plan at the Submission stage, an addendum to the Pre-Submission SA Report (April 2011) was produced in December 2011 (available on Wiltshire Council's website). The addendum considered how the Bridging Schedule of Changes affected the findings of the Pre-Submission SA Report. To address the further changes as a result of the hearing sessions (Schedule of Main Modifications and Schedule of Additional Changes) a revised/updated addendum was published in May 2012 (available on Wiltshire Council's website) to accompany the schedule of

changes on consultation. During the consultation period for the three schedules a landowner withdrew consent for the site to be included in the plan. As a result, it is necessary to update/revise the addendum produced in May 2012. This addendum therefore seeks to outline the changes made to the plan since the publication of the Pre-Submission document and consider how these changes affect the findings of the Pre-submission SA Report (April 2011). This addendum supersedes the December 2011 addendum and should be read in conjunction with the Pre-Submission SA Report (April 2011) - for a full account of how the Sustainability Appraisal has influenced the process to date - as well as the three schedule of changes.

## 2.0 CHANGES TO THE PLAN

### Bridging Schedule of Changes

- 2.1 Prior to submitting the document in February 2012, the Councils amended the plan to reflect comments received during the consultation (13<sup>th</sup> June to 08<sup>th</sup> August 2011) on the Pre-Submission version. During the consultation the Councils were made aware of changes in land ownership consent affecting two of the sites<sup>1</sup> listed in the proposed Pre-Submission document. In response to the landowner requests for removal of these sites, these sites were effectively deemed 'undeliverable' and removed from the final site allocations list. In light of this, and to refresh the land ownership information collected when the site selection process began in 2005/06, the Councils contacted the remaining landowners in Autumn 2011 to confirm the deliverability of all sites within the proposed plan. The outcome of this exercise confirmed that 35 of the 43 sites contained within the Pre-Submission version of the plan could be considered deliverable in relation to landowner consent.
- 2.2 The eight sites which have been removed from the site allocations list following the landowner consent exercise are:
- West Ashton Employment Allocation, Trowbridge
  - Castledown Business Park, Ludgershall
  - Nursteed Road Employment Allocation, Devizes
  - Salisbury Road Business Park, Pewsey
  - Solstice Business Park, Amesbury
  - Sarum Business Centre, Salisbury
  - Thorney Down WTS, Winterslow
  - Salisbury Road Industrial Estate, Downton
- 2.3 Other minor changes to the plan include:
- the removal of Household Recycling Centre (HRC) from the list of potential waste development types at Leafield Industrial Estate, Corsham<sup>2</sup>;
  - Chitterne Waste Management Facility is now called - Land at Valley Farm, Chitterne.
  - Wiltshire Waste, Tinkersfield Farm, Devizes has been renamed - Wiltshire Waste (Recycling) Ltd, Tinkfield Transfer Station, Devizes.

---

<sup>1</sup> Nursteed Road Employment Allocation, Devizes; and West Ashton Employment Allocation, Trowbridge

<sup>2</sup> HRC was removed following a discussion between the Council and landowner, who indicated that there isn't enough space on the site to accommodate the queuing traffic associated with this waste development type.

## Schedule of Main Modifications

- 2.4 The proposed main modifications arising as a result of the examination hearing sessions are considered necessary to make the document 'sound'. The changes mainly relate to clarifying the interpretation of the plan and strengthening the wording of the landscape, townscape and visual sections for three site profiles (Land at Valley Farm (Chitterne), Brickworth Quarry and Landfill (Whiteparish) & Employment Allocation (Mere)). The other main change is that a new policy has been proposed to ensure that the plan is in line with the National Planning Policy Framework (NPPF) (March 2012). The policy wording is as follows:

*"Policy WSA1:*

*When considering waste development proposals the councils will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF). Each council will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.*

*Planning applications that accord with the policies in this Local Plan (or policies in other adopted Local Plans of the Councils) will be approved without delay, unless material considerations indicate otherwise.*

*Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then planning permission will be granted unless material considerations indicate otherwise – taking into account whether:*

- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or*
- Specific policies in the NPPF indicate that development should be restricted."*

## Schedule of Additional Changes

- 2.5 The proposed additional changes mainly relate to ensuring that the plan is consistent with terminologies used in the Town & Country Planning (Local Planning)(England) Regulations 2012. These include:
- Replace references to "[Waste Site Allocations] Development Plan Document (DPD)" to read: "**[Waste Site Allocations] Local Plan**"
  - Replace references to "Local Development Frameworks (LDFs)" to read: "**Development Plans**"
  - Replace references to "Waste Development Framework" to read: "**Waste Development Plan**"

## Removal of Site S3 'Employment Allocation, Mere'

- 2.6 During the consultation on the Schedules of Modifications (June/July 2012) the landowner withdrew consent for the site so it has therefore been removed from the plan.

### 3.0 HOW DO THE CHANGES AFFECT THE FINDINGS OF THE PRE-SUBMISSION SA REPORT (APRIL 2011)

#### Part A: Bridging Schedule of Changes (February 2012)

- 3.1 The key amendments to the Pre-Submission SA Report as a result of the Bridging Schedule of Changes are as follows:

##### Pre-Submission SA Report as a whole

- Chitterne Waste Management Facility should now be referred to as Land at Valley Farm, Chitterne.
- Wiltshire Waste Tinkersfield Farm, Devizes should now be referred to as Wiltshire Waste (Recycling) Ltd Tinkfield Transfer Station, Devizes.

##### Section 5 of the Pre-Submission SA Report

- The summary of the individual appraisals for the eight sites removed from the site allocations list should be disregarded, including the key issues to be considered in cumulative effects for each of these sites.
- Pickpit Hill (Ludgershall) - the key issues to be considered in the Cumulative Effects Assessment should be disregarded due to the removal of Castledown Business Park (Ludgershall), as there is no longer potential for waste developments at these sites to act cumulatively.
- Wiltshire Waste Tinkersfield Farm, Devizes (now called Wiltshire Waste (Recycling) Ltd Tinkfield Transfer Station, Devizes) - Biodiversity and Geodiversity and Human Health and Amenity within the key issues to be considered in the Cumulative Effects should be disregarded due to the removal of Nursteed Road Employment Allocation (Devizes), as there is no longer potential for waste developments at these sites to act cumulatively.
- HRC has been removed as a potential waste development type at Leafield Industrial Estate, Corsham. The removal of HRC at this site means that there is likely to be less of an impact on levels of atmospheric pollution noise, vibration, odour and nuisance through increased traffic and operations.

##### Section 6 of the Pre-Submission SA Report

- The following sites should be removed from consideration under **air quality** as there is no longer the potential for cumulative effects:
  - Castledown Business Park, Ludgershall;
  - Pickpit Hill, Ludgershall;
  - Nursteed Road Employment Allocation, Devizes; and
  - Wiltshire Waste Tinkersfield Farm, Devizes.
- The following sites should be removed from consideration under **biodiversity and geodiversity** as there is no longer the potential for cumulative effects:
  - Nursteed Road Employment Allocation, Devizes;
  - Wiltshire Waste Tinkersfield Farm, Devizes;
  - Sarum Business Park, Salisbury; and
  - Salisbury Road Industrial Estate, Downton.

- The following sites should be removed from consideration under **human health and amenity** as there is no longer the potential for cumulative effects:
  - Castledown Business Park, Ludgershall;
  - Pickpit Hill, Ludgershall;
  - Nursteed Road Employment Allocation, Devizes; and
  - Wiltshire Waste Tinkersfield Farm, Devizes.
- The following sites should be removed from consideration under **traffic and transportation** as there is no longer the potential for cumulative effects:
  - Castledown Business Park, Ludgershall;
  - Nursteed Road Employment Allocation, Devizes; and
  - West Ashton Employment Allocation, Trowbridge.

Appendix 2

- Changes to Appendix 2 as a result of updated waste capacity information (Waste Capacity Gap Report October 2011) are marked in **red** (additions) and **red strikethrough** (deletions).

*Permitted additional capacity, by waste stream and type of facility, since 2006*

Waste stream	Type of facility	Capacity (tpa)	Capacity (tonnes)	Void space capacity (m <sup>3</sup> )
<b>Municipal</b>	Waste treatment	<del>38,000</del> 60,000		
	Outdoor composting	<del>35,050</del> 45,050		
	Recycling	<del>38,000</del> 28,000		
<b>Industrial and commercial</b>	Waste treatment	<del>122,000</del> 82,000		
	Recycling/transfer	91,538		
	Landfill		<del>725,840</del> 663,200 <sup>3</sup>	<del>604,867</del> 552,666 <sup>4</sup>
<b>Inert</b>	Recycling/transfer	96,730		
	Landfill		988,000	988,000 <sup>5</sup>

*Calculation for generating the revised capacity figures (2011 – 2026)*

Waste Stream	Type of capacity	(A) Capacity to be delivered (2006-2026)	(B) Capacity delivered 2006 – 2010	(A) – (B) Capacity to be delivered (2011-2026)
<b>Municipal</b>	Treatment	54,000 tpa	<del>38,000</del> 60,000	<del>16,000 tpa</del> -6,000 tpa
	HRC	3	2	1
	MRF	1	1	1

<sup>3</sup> Figure takes into account a landfill application which will take in 29% I&C waste (and 71% municipal).

<sup>4</sup> Void space capacity for industrial and commercial waste calculated on conversion ratio of 1.2 tonnes per m<sup>3</sup> (source EA).

<sup>5</sup> Void space capacity for inert waste calculated on conversion ratio of 1 tonne per m<sup>3</sup> (source EA).



<b>Industrial and commercial</b>	Void space	915,870 m <sup>3</sup>	<del>604,867</del> 552,666 <sup>3</sup>	<del>363,003m<sup>3</sup></del> 363,204m <sup>3</sup>
	Treatment	250,000 tpa	<del>122,000</del> 82,000	<del>128,000 tpa</del> 168,000 tpa
	Recycling	150,000 tpa	91,538	58,462 tpa
<b>Inert</b>	Void space	950,000 m <sup>3</sup>	988,000	-33,000 m <sup>3</sup>
	Recycling/Transfer	90,000 tpa	96,730	-6,730 tpa

*Revised capacity figures (2011 – 2026)*

Waste Stream	Type of capacity	Capacity to be delivered (2011-2026)
<b>Municipal</b>	Treatment	<del>16,000 tpa</del> -6,000 tpa
	Recycling	1 HRC
	Materials Recovery	1 MRF
<b>Industrial and commercial</b>	Void space	<del>311,003 m<sup>3</sup></del> 363,204 m <sup>3</sup>
	Treatment	<del>128,000 tpa</del> 168,000 tpa
	Recycling	58,462 tpa

Non-Technical Summary

- Changes to the Cumulative Effects of Waste Site Allocations table are marked in red (additions) and red ~~strikethrough~~ (deletions).

Cumulative Effects of Waste Site Allocations	
Site Cluster	Cumulative Effects on:
<ul style="list-style-type: none"> <li>•Waterside Park, Swindon</li> <li>•Brindley Close / Darby Close</li> <li>•Land at Kendrick Industrial Estate, Swindon</li> <li>•Rodbourne Sewerage Treatment Works</li> </ul>	<p><b>Air Quality</b> - sites are located in close proximity.</p> <p><b>Biodiversity &amp; Geodiversity</b> - sites are in close proximity to 3 County Wildlife Sites.</p> <p><b>Human Health &amp; Amenity</b> - sites are in close proximity to employment uses.</p> <p><b>Traffic &amp; Transportation</b> - potential for negative effects on local transport infrastructure.</p>
<ul style="list-style-type: none"> <li>•Parkgate Farm, Purton</li> <li>•Purton Brickworks Employment Allocation, Purton</li> </ul>	<p><b>Air Quality</b> - sites are located in close proximity.</p> <p><b>Human Health &amp; Amenity</b> - sites are in close proximity to a residential area.</p> <p><b>Traffic &amp; Transportation</b> - potential for negative effects on local transport infrastructure.</p>
<ul style="list-style-type: none"> <li>•Land East of HRC/WTS at Stanton St Quinton</li> <li>•Land West of HRC &amp; WTS, Stanton St Quinton</li> </ul>	<p><b>Air Quality</b> - sites are located in close proximity.</p> <p><b>Biodiversity &amp; Geodiversity</b> - sites are in close proximity to 2 Sites of Special Scientific Interest.</p>

Cumulative Effects of Waste Site Allocations	
Site Cluster	Cumulative Effects on:
	<p><b>Human Health &amp; Amenity</b> - sites are located in close proximity to farms and businesses.</p> <p><b>Traffic &amp; Transportation</b> - potential for negative effects on local transport infrastructure.</p>
<ul style="list-style-type: none"> <li>• Hampton Business Park, Melksham</li> <li>• Bowerhill Industrial Estate, Melksham</li> </ul>	<p><b>Air Quality</b> - sites are located in close proximity.</p> <p><b>Human Health &amp; Amenity</b> - sites are in close proximity to employment uses.</p> <p><b>Traffic &amp; Transportation</b> - potential for negative effects on local transport infrastructure.</p>
<ul style="list-style-type: none"> <li>• West Wilts Trading Estate, Westbury</li> <li>• Northacre Trading Estate, Westbury</li> </ul>	<p><b>Air Quality</b> - sites are located in close proximity.</p> <p><b>Biodiversity &amp; Geodiversity</b> - a number of County Wildlife Sites are within 1km.</p> <p><b>Human Health &amp; Amenity</b> - sites are in close proximity to residential and employment areas.</p> <p><b>Traffic &amp; Transportation</b> - potential for negative effects on local transport infrastructure.</p>
<ul style="list-style-type: none"> <li>• <del>Castledown Business Park, Ludgershall</del></li> <li>• <del>Pickpit Hill, Ludgershall</del></li> </ul>	<p><del><b>Air Quality</b> - sites are located in close proximity.</del></p> <p><del><b>Human Health &amp; Amenity</b> - sites are in close proximity to residential and employment areas.</del></p> <p><del><b>Traffic &amp; Transportation</b> - potential for negative effects on local transport infrastructure and congestion and capacity issues with regard to the A3026.</del></p>
<ul style="list-style-type: none"> <li>• <del>Nursteed Road Employment Allocation, Devizes</del></li> <li>• <del>Wiltshire Waste Tinkersfield Farm, Devizes</del></li> </ul>	<p><del><b>Air Quality</b> - sites are located in close proximity.</del></p> <p><del><b>Biodiversity &amp; Geodiversity</b> - sites are in close proximity to Nursteed Farm Woods County Wildlife Site.</del></p> <p><del><b>Human Health &amp; Amenity</b> - sites are in close proximity to employment uses.</del></p>
<ul style="list-style-type: none"> <li>• Hopton Industrial Estate, Devizes</li> <li>• <del>Nursteed Road Employment Allocation, Devizes</del></li> <li>• Wiltshire Waste (Recycling) Ltd Tinkersfield Farm Transfer Station, Devizes</li> </ul>	<p><b>Traffic &amp; Transportation</b> - potential for negative effects on local transport infrastructure and congestion and capacity issues with regard to the A361.</p>
<ul style="list-style-type: none"> <li>• CB Skip Hire, St Thomas Farm, Amesbury</li> <li>• <del>Sarum Business Park, Salisbury</del></li> <li>• <del>Salisbury Road Industrial Estate, Downton</del></li> <li>• Former Imerys Quarry, Quidhampton</li> </ul>	<p><b>Biodiversity &amp; Geodiversity</b> - sites are in close proximity to the River Avon Special Area of Conservation.</p>

Cumulative Effects of Waste Site Allocations	
Site Cluster	Cumulative Effects on:
<ul style="list-style-type: none"> <li>• Bumpers Farm Industrial Estate</li> <li>• Thingley Junction, Chippenham</li> <li>• Leafield Industrial Estate, Calne</li> <li>• Hampton Business Park, Melksham</li> <li>• West Wilts Trading Estate, Westbury</li> <li>• Northacre Trading Estate, Westbury</li> <li>• Lafarge Cement Works</li> <li>• Bowerhill Industrial Estate, Melksham</li> <li>• Canal Road Industrial Estate, Trowbridge</li> <li>• <del>West Ashton Employment Allocation, Trowbridge</del></li> <li>• Warminster Business Park, Warminster</li> </ul>	<p><b>Traffic &amp; Transportation</b> - potential for congestion and capacity issues with regard to the A350.</p>

### Schedule of Main Modifications

- 3.2 The majority of main modifications do not change the findings of the Pre-Submission SA Report as they relate to the clarification of text and strengthening of site profiles. The inclusion of the new policy (WSA1) is due to changes in National planning policy, specifically the publication of the NPPF in March 2012. The intent of the policy is to express how the plan intends to guide the user in terms of the presumption in favour of sustainable development contained in the NPPF.
- 3.3 This policy may require the Councils to take a more proactive and pro-development approach, requiring them to work *'proactively with applicants to find solutions which mean that proposals can be approved wherever possible'*. This has the potential to lead to more approvals of waste development in the two Council areas. The policy also requires the Councils to approve development that accords with the plan and the NPPF *'without delay, unless material considerations indicate otherwise'*. The effect of this may be to speed up the approval process for individual developments, although it is noted that Local Authorities already have strong incentives to ensure the timely processing of applications.
- 3.4 At a strategic level, the effects of this policy when considered against the Revised SA Framework (Table 4.2, Pre-Submission SA Report, April 2011) are somewhat uncertain, as it would be dependent on how the policy WSA1 was interpreted by either the Planning Authority, or the Planning Inspector or higher authority in the event of an appeal or court hearing. It is possible, although considered unlikely, that the policy may result in additional waste development being granted development consent. However, the Sustainability Appraisal of the Waste Local Development Framework (now Waste Local Development Plan) has assessed that there are adequate mitigation measures and checks in place throughout the three Local Development Documents (Core Strategy, Development Control Policies and Site Allocations documents) to minimise any adverse environmental or social effects arising from the development of waste facilities in the plan area. The addition of policy WSA1 is considered unlikely to change that. There is some possibility that the policy may increase the positive economic effects of the plan by providing a more

proactive approach to development, however this would again depend on the interpretation of the policy.

- 3.5 The effect of this policy on the findings of the Pre-Submission SA Report is therefore minimal. It may add additional uncertainty to the findings of the cumulative effects assessment (Section 6, Pre-Submission SA Report April 2011) as there is the potential for waste development in the future to occur on sites that have not been considered by the SA. This means that if a new waste site were put forward and then developed, there is the potential for that waste development to act cumulatively with other waste developments on sites that have been considered in the Pre-Submission SA Report. However, as previously mentioned above, there are likely to be sufficient site level mitigation measures - such as those identified in Sections 5 and 6 of the Pre-Submission SA Report - to ensure that the impacts of additional waste developments are not significant.

### **Part C: Schedule of Additional Changes**

- 3.6 The Schedule of Additional Changes does not alter the findings of the Pre-Submission SA Report; however, they do result in changes to the terminology used in the Pre-Submission SA Report. These are as follows:

#### *Pre-Submission SA Report and Non-technical Summary as a whole*

- Replace references to Development Plan Documents (DPDs) to Local Plans. Note: References to the Waste Core Strategy and Development Control DPDs should remain the same as these documents were adopted prior to the Town & Country Planning (Local Planning)(England) Regulations 2012.
- Replace references to Local Development Frameworks (LDFs) to Development Plans.
- Replace references to the Waste Development Framework or Minerals Development Framework to read Waste Development Plan or Minerals Development Plan.

#### **Removal of Site S3 'Employment Allocation, Mere'**

- 3.7 The key amendment to the Pre-Submission SA Report as a result of the removal of Site S3 'Employment Allocation, Mere' is as follows:

#### *Section 5 of the Pre-Submission SA Report*

- The summary of the individual appraisal for the site should be disregarded.

## **4.0 CONCLUSION**

- 4.1 The significant changes to the plan since the publication of the Pre-Submission document is the removal of nine of the 43 sites considered suitable to accommodate future waste management uses and the inclusion of a new policy to address changes in National planning policy. The removal of nine sites does not significantly alter the findings of the individual appraisals for the remaining 34 site allocations. It predominantly has impacts on the consideration of the cumulative effects of site clusters. This means that there are fewer clusters of sites with the potential for cumulative negative effects on key receptors, which include Air Quality; Biodiversity & Geodiversity; Human Health & Amenity and Traffic & Transport.

- 4.2 The effect of the new policy on the findings of the Pre-Submission SA Report is minimal. It adds some uncertainty to the findings of the cumulative effects assessment (Section 6, Pre-Submission SA Report April 2011) as there is the potential for increased future waste development on sites that have not been considered by the SA. This means that if a new waste site were put forward and then developed, there is the potential for that waste development to act cumulatively with other waste developments on sites that have considered in the Pre-Submission SA Report. Despite this added uncertainty, there are likely to be sufficient site level mitigation measures - such as those identified in Sections 5 and 6 of the Pre-Submission SA Report - to ensure that the impacts of additional waste developments are not significant.
- 4.3 It should be noted that the Habitats Regulations Assessment (HRA) Screening Report (Dec 2011) that accompanied the plan on submission considered the removal of the eight sites as outlined in the Bridging Schedule of Changes. The changes to the plan proposed in the Schedule of Main Modifications and the Schedule of Additional Changes and the removal of an additional site do not alter the findings of the HRA Screening Report.