Soundness tool

Key question	Possible evidence	Evidence provided
Justified		
Participation		
Has the consultation process allowed for effective engagement of all interested parties?	The consultation statement	In the opinion of the councils, the process of preparing the Wiltshire and Swindon Waste Site Allocations DPD has been inclusive and designed to meet the requirements of national policy and commitments laid out in the adopted Statements of Community Involvement (SCI).
Research/ fact finding		
 Is the content of the development plan document justified by the evidence? What is the source of the evidence? How up to date and convincing is it? 	 i. Sections of the development plan document which show how the evidence points towards the selected strategy, policies or proposals ii. Sections of the pre-submission proposals documents iii. Sections of the preferred strategy report iv. Sections of the sustainability appraisal report which set out its main conclusions in relation to the policies in the development plan document v. Sections of the consultation statement OR A very brief statement of how the main findings of consultation support the policies, with reference to: reports to the council on the issues raised during participation, covering both the front-loading and formulation phases any other information on community views and preferences vi. The studies, reports and technical papers that provide the evidence for the policies set out in the development plan document. The date of preparation 	In the opinion of the councils, the DPD is justified by evidence and higher order adopted waste policies. See document library (document reference WAS/29). The DPD sets out a flexible framework of sites for waste development to meet an identified capacity gap. The starting point for our evidence is the adopted Waste Core Strategy position, which in turn, took its lead from the draft RSS policies and forecasts of waste provision requirements for the period up to 2026. Although the status of the draft RSS has recently changed, the councils have been advised to continue to rely upon the evidence that was developed to support the regional policy position. The capacity gap analysis has been updated since the adoption of the Waste Core Strategy and this work further demonstrates the need for additional sites to meet local forecasts of

Key question	Possible evidence	Evidence provided
	signposted OR For each policy (or group of policies dealing with the same issue), a very brief statement of the evidence documents relied upon and how they support the policy (where this is not already clear in the reasoned justification in the development plan document)	arisings over the period up to 2026. The challenge of identifying sites for future waste management development has not been easy. The councils have made important and difficult decisions throughout the plan preparation process and the remaining sites are considered to offer the best opportunity for a) the market in terms of development; and b) the councils in terms of location and flexibility.
		The DPP has been prepared in an open and inclusive manner. All consultation and engagement activity has been widely publicised; and the plan has certainly benefitted from the comments and advice received. However, as set out above, difficult professional and political decisions have had to be made to ensure that the final DPD presents sufficient opportunity for waste uses. Much of the objection to the plan relates to a general perception that waste uses should not be located near communities, but this in essence underlines the difficulty of planning for waste. Society accepts a basic need to have waste collected, but still appears unwilling to accept that facilities for the management of that waste should be located close to where the waste originates. See document library (in particular 'Waste Core Documents' tab).
5. What assumptions had to be made in preparing the development plan document?6. Are the assumptions reasonable and justified?	 i. Sections of the development plan documents setting out the assumptions ii. Sections of the sustainability appraisal report setting out the assumptions iii. A very brief statement for each assumption as to how the evidence led to the assumption iv. Reference to national or regional policy, 	The basic assumptions that had to be made related to the confidence the councils could afford to the forecasts of projected waste arisings. Although the issue of waste data (availability and quality) has improved since the commencement of the plan preparation process, the councils are still reliant on data that, for certain waste streams, is still anachronistic. The

Key question	Possible evidence	Evidence provided
	correspondence from bodies consulted or technical papers that provide the basis for assumptions	councils have sought to address this through local data capture and monitoring processes. However, the fact remains that the DPD has to base itself on forecasts originally devised to service the draft RSS.
		Taking the legislative (e.g. the EU Waste Framework Directive) and higher order policy (e.g. PPS10, draft RSS, adopted Waste Core Strategy) imperative, the councils are confident that the submitted DPD represents the best approach to addressing Wiltshire and Swindon's long-term waste requirements. See document library (document references WAS/02; WAS/03; WAS/14).
Alternatives		
 7. Can it be shown that the council's chosen approach is the most appropriate given the reasonable alternatives? 8. Have realistic alternatives been considered and is there a clear audit trail showing how and why the preferred strategy/approach was arrived at? 9. Where a balance had to be struck in taking decisions between competing alternatives is it clear how and why these decisions were made? 	 i. Sections of the consultation statement showing how the community was involved in considering issues, alternatives and options ii. Documents used in community involvement with stakeholders and communities encouraging them to identify the issues and options they wished to see considered iii. Any report produced at the end of the front loading phase of plan preparation setting out the issues and options raised iv. Sections of the preferred strategy report explaining: how alternatives were developed and evaluated, and why alternatives were rejected in favour of the preferred strategy v. Sections of the sustainability appraisal report showing the options and alternatives and explaining how they were objectively assessed vi. Reports prepared during the plan preparation 	At the most basic level, the approach set out within the DPD presents a clear choice made by the councils to take the difficult decisions that accompany the identification of sites. By far the simplest approach would have been to present a criteria based policy approach that merely directed how new waste facilities should be determined. However, the councils did not opt for such an approach and instead developed the policies of the adopted Waste Core Strategy (Vision, Strategic Objectives, policies WCS2, WCS3 and WCS5) by systematically planning where new sites should be located and at what scale. The process of identifying potential sites was aided by an iterative SA/SEA process and the councils own Site Appraisal Methodology. Detailed appraisals of individual sites allowed for

Key question	Possible evidence	Evidence provided
	participation) contributing to the decisions made on the inclusion of policies in the development plan document vii. Sections of the consultation statement explaining how the main findings of consultation support the decisions viii. Sections of the representations statement OR A brief statement of the influence upon decisions of: the issues raised during stakeholder and community engagement, and how they have been addressed ix. Any other documentation showing how alternatives were developed and evaluated x. A very brief statement and any other supporting documentation of the way decisions have been taken	environmental, economic and social impact of all proposed sites. In addition, early engagement (the Waste Forum) and consultation activity (2006, 2010 and 2011) have allowed for local input into the overall approach set out within the DPD. See document library (document references WAS/22; WAS/07; WAS/02; WAS/03; WAS/14).
10. Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the development plan document from the start?	 i. A structure to the development plan document which reports the sustainability appraisal findings in relation to each policy ii. Sections of the sustainability appraisal report which set out how sustainability appraisal has influenced the development of the preferred strategy and how policies have been revised in the light of sustainability appraisal findings iii. Reports made as part of plan-making which indicate how sustainability appraisal has influenced the choice of strategy and the content of policies 	The SA/SEA process has been continuous and challenging. At each stage of preparing the DPD, the councils have benefitted from the advice of the SA/SEA consultants. If needs be, the councils will involve the SA/SEA consultants in the examination to help demonstrate how the plan has evolved through time.
 11. Does the development plan document adequately expand upon regional guidance rather than simply duplicate it? 12. Does the strategy take forward the regional context reflecting the local issues and objectives? 	 i. Sections of the development plan document which explain where and how regional guidance has been elaborated upon and the reasons ii. The regional development agency/regional planning body letter confirming that the development plan document is in general conformity with the regional special strategy iii. Representations received from the regional 	The councils can demonstrate that the DPD generally conforms with higher order policies, including the draft RSS for the south west. However, like the adopted Waste Core Strategy, the Site Allocations DPD does not duplicate the provisions of draft RSS policies. It [the DPD] is an expression of locally derived data and evidence. It seeks to offer the councils and the market a flexible framework of opportunity, rather

Key question	Possible evidence	Evidence provided
	development agency/regional planning body iv. Representations from the Government Office v. Reports or copies of correspondence as to how the representations have been considered and dealt with	than a slavish prescription for future development. The waste industry is rapidly changing. New and exciting developments are taking place in terms of the method and process of managing waste. Gone are the days of simple landfilling and new technologies are being embraced up and down the country. The submitted DPD (and the policies of the adopted Waste Core Strategy) do not seek to impose, or restrict choice because the councils recognise that to do so may limit innovation. The submitted DPD presents opportunity and choice by identifying what types of uses could be developed on the allocated sites, but ultimately it will be the market that determines precisely what form any subsequent waste development will take (subject to the regimes of licensing and determining individual planning applications.

Effective		
Deliverable		
 13. Has the council clearly identified what the issues are that the development plan document is seeking to address? 14. Have priorities been set so that it is clear what the development plan document is seeking to achieve? 	 i. Sections of the development plan document which refer to the vision and objectives of the sustainable community strategy and the issues identified there ii. A statement prepared following stakeholder and community engagement in the front-loading phase of plan-making setting out the identified issues for the development plan document A spatial portrait based on the advice in 'Policies for spatial plans' presented as part of the core strategy iii. A core strategy vision which is framed to set out the outcomes which are sought for the future iv. Sections of the development plan document which identify the main issues addressed v. Sections of the development plan document which indicate the priority outcomes 	The Waste Site Allocations DPD is influenced and guided by the clearly articulated issues and projected solutions outlined in the councils adopted Waste Core Strategy. See document library (document reference WAS/29). The councils have identified a need for new waste management facilities to meet the demands of local communities, commerce and industry. Therefore, the overall priority for the councils is ensuring that there are sufficient and flexible sites allocated in the development plan for waste development. The submitted Waste Site Allocations DPD seeks to deliver this strategic priority.
15. Are there any cross-boundary issues that should be addressed and, if so, have they been adequately addressed?	 i. Sections of the regional special strategy which identify cross-boundary issues. ii. Sections of the development plan document setting out cross-boundary issues and the response to them iii. Reports on relevant studies which cover wider areas than the local authority and how the development plan document addresses their findings or recommendations iv. Records of meetings with adjoining authorities or relevant agencies which confirm that there are no cross-boundary issues of significance 	The councils have ensured that all necessary dialogue with neighbouring authorities has been undertaken throughout the plan preparation process. In the absence of an RTAB in the south west, it has been down to local authority planning officers and waste managers to convene meetings to discuss shared issues – e.g. in relation to data; or advice to the Regional Planning Body through the preparation of the draft RSS for the south west (Wiltshire drafted some of the original waste policies in the draft RSS). However, issues relating to the management of waste should be addressed on a self-sufficiency basis, with each constituent local authority addressing issues of local waste arisings. See document library (document references WAS/26; WAS/27). Evidence of recent RTAB discussions

		chaired by Somerset County Council available on request.
16. Does the development plan document contain clear objectives?	 i. A spatial portrait which identifies the key issues facing the area ii. A core strategy vision which is framed to set out the outcomes which are sought for the future iii. The strategic objectives of the development plan document, and the commentary in the development plan document of how they derive from the spatial portrait and vision 	As outlined above, the submitted Waste Site Allocations DPD takes its lead from the objectives set out within the adopted Waste Core Strategy DPD, particularly in respect to the local waste hierarchy (policy WCS5). In addition, every effort has been made to reflect higher order objectives – e.g. the EU Waste Framework Directive through the provision of a flexible and responsive framework of sites for waste management development.
17. Are the objectives specific to the place; as opposed to being general and applicable to anywhere?18. Is there a direct relationship between the identified issues and the objectives?	 i. The spatial portrait and the commentary in the development plan document as to how the objectives derive from it ii. Confirmation from the local strategic partnership and partner organisations that they agree the objectives as being specific to the place 	On both counts – yes. The adopted Waste Core Strategy sets clear objectives applicable to issues affecting Wiltshire and Swindon. The submitted Waste Site Allocations DPD is an expression of these objectives. As with all policies and proposals, the councils are committed to the principles of <i>plan, monitor and manage</i> . So, all aspects of planning for the needs of Wiltshire and Swindon's communities will be kept under review to ensure development patterns continue to meet local needs. See document library (document references WAS/26; CPP/08; CPP/12; CPP/13; WAS/29).
19. Is it clear how the policies will meet the objectives?20. Are there any obvious gaps in the policies, with regard to the objectives of the development plan document?	 i. Relevant sections of the development plan document which explain how policies derive from the objectives and are designed to meet them ii. Relevant sections of the sustainable community strategy which identify its objectives iii. Confirmation from the local strategic partnership and partner organisations that they believe the polices will achieve the agreed objectives iv. Research reports and studies which address the means to address objectives and conclude that the 	As above. See document library (document references WAS/27; WAS/13).

	v. Sections of the development plan document, reports or other documents which discuss the matters which should be addressed in the development plan document.	
21. Are there realistic timescales related to the objectives?	 i. Sections of the development plan document which address delivery and the timescales for key developments and initiatives ii. Confirmation from the local strategic partnership and partner organisations that the timescales are realistic in terms of their contribution to delivery 	The DPD is a long-term plan (2026) for managing projected waste arisings across Wiltshire and Swindon. The DPD does not aim to state precisely when new development will be built. In many ways it cannot possibly offer that level of precision. As outlined above, the DPD is designed to provide a flexible framework of site specific opportunity to express the strategy set out in higher order policy. All aspects of the Waste Development Framework will be kept under continuous review to ensure that the councils have the right policies in place to address local circumstances.
22. Are the policies internally consistent?	 i. Sections of the development plan document, documents used in community involvement, and technical papers which demonstrate that the objectives are consistent ii. A very brief statement explaining how the council considers its objectives are consistent 	In the opinion of the councils, there are clear links and synergies across the adopted and emerging policy framework for waste management. These links have been forged from the moment the councils set out their commitment to reviewing the adopted joint Waste Local Plan and laid out their proposals for the preparation of Waste DPDs. See document library (document references LDS/01 and LDS/02).
 23. Does the development plan document contain material which: is already in another plan should be logically be in a different plan should not be in a plan at 	 i. Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each development plan document. This should show how they combine to provide a coherent policy structure ii. Representations from the Government Office iii. Reports or copies of correspondence as to how the representations have been considered and dealt with 	No, the councils have deliberately ensured that the overall Wiltshire and Swindon Waste Development Framework is laid out in succession to ensure a 'chain of conformity' from the adopted Waste Core Strategy downwards into other DPDs. The submitted Waste Site Allocations DPD represents the final element of the current Wiltshire and Swindon Waste

all?		Development Framework.
24. Does the development plan document explain how its key policy objectives will be achieved?	 i. Sections of the development plan document that identify the key objectives and how they will be delivered upon ii. Confirmation from the relevant agencies that they support the objectives and the identified means of delivery iii. Other supporting material – for example, commitments in the local area agreement that will support the delivery of the strategy in the development plan document 	Yes, the Waste Site Allocations DPD essentially delivers Core Strategy policies WCS2, WCS3 and WCS5.
25. If there are development management policies, are they supportive of the strategy and objectives?	 i. Sections of the development plan document that show how the development management policies: will help to deliver the strategy 37. derive from, and elaborate on, the objectives and policies of the plan 	Not applicable. The councils have already adopted their Waste Development Control Policies DPD (September 2009). See document library (document reference WAS/28).
26. Have the infrastructure implications of the strategy/policies clearly been identified?	 i. A section or sections of the development plan document where infrastructure needs are identified and the proposed solutions put forward ii. Representations in respect of infrastructure iii. Reports or copies of correspondence as to how representations in relation to infrastructure have been considered and dealt with 	Yes. The evidence gathered through consultation, engagement and site appraisal have, in the opinion of the councils, sufficiently addressed issues of infrastructure connectivity. Where necessary improvements have been identified, the submitted DPD presents clear advice to any subsequent developer as to what will need to be addressed through a subsequent planning application process. See document library (document references WAS/14; WAS/17; WAS/23).
27. Are the delivery mechanisms and timescales for implementation of the policies clearly identified?	 i. Sections of the development plan document setting out delivery mechanisms and timescale ii. Other development plan documents being prepared that develop the policies of the core strategy further and set out how they will be delivered 	The DPD sets out clear monitoring framework; and, as with higher order adopted waste policies, the councils are committed to ensuring that proposals are brought forward in a timely manner to address local needs.

organisation to implement the policies? 31. Does the development plan document reflect the concept	representations on delivery and implementation have been considered and dealt with i. Sections of the development plan document that	Yes. The Site Allocations DPD presents spatial
29. Is it clear who is intended to implement each part of the strategy/ development plan document?30. Where actions required to implement policy are outside the direct control of the council, is there evidence of commitment from the relevant	 i. Sections of the development plan document setting out responsibilities for delivery ii. Correspondence showing how other stakeholders intend to support the delivery of the policies iii. Reports by the council or the relevant stakeholder iv. Representations from stakeholders on implementation v. Reports or copies of correspondence as to how 	Again, as far as is reasonably practicable – yes.
28. Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the strategy/policies?	 i. Confirmation from infrastructure providers that they support the solutions proposed and the identified means and timescales for their delivery ii. Representations in respect of infrastructure iii. Reports or copies of correspondence on how representations in relation to infrastructure and its timing have been considered and dealt with 	As far as is reasonably practicable – yes (bearing in mind the scope and subject matter of the submitted DPD). Detailed aspects of infrastructure connectivity will be matters for subsequent planning applications to address.
	 iii. Research or studies that address matters of delivery and the realistic timescales iv. Documents that set out arrangements made or planned for local delivery vehicles, or other delivery mechanisms v. Very brief statements on how other stakeholders intend to support the delivery of the policies, with any supporting correspondence or reports by the authority or the relevant stakeholder vi. Correspondence from stakeholders on delivery mechanisms and timescale vii. Reports or copies of correspondence as to how representations on delivery and implementation have been considered and dealt with 	With the review of the councils (separate) municipal waste contracts pending ¹ , the Waste Site Allocations DPD will play a vital role in presenting flexibility and opportunity for the development of additional waste facilities (including waste technologies). Without the Site Allocations DPD, the councils (and the wider waste industry) may struggle to bring forward the right sites, in the right place, at the right time to meet changing demand.

¹ Current contracts run until 2016. Both authorities will be looking to tender for the next round of contracts over the next 3 years and hence the needs of the respective services will need the security of site allocations in the development plan.

of spatial planning? 32. Does it go beyond traditional land use planning by bringing together – and integrating – policies for development, and the use of land, with other policies and programmes from a variety of organisations that influence the nature of places and how they function?	reflect the plans or strategies of other bodies ii. Expressions of support from bodies responsible for other strategies affecting the area iii. Representations in respect of services provided by other agencies iv. Reports or copies of correspondence as to how the representations have been considered and dealt with. These should either clarify the issues raised in the representation, or include a copy of the substance of the representation	DPD policies (WCS2, WCS3). The geography of the plan area directly influences the opportunity (scale and location) for all forms of development, including waste facilities. The three Areas of Outstanding Natural Beauty and the New Forest National Park tend to restrain development opportunities, leaving a clear belt of land running from Swindon down through the Principal Settlements of Chippenham, Trowbridge and Salisbury where the vast majority of housing, commerce and jobs occurs. It is within this area (as defined in the Spatial Portrait set out within the adopted Waste Core Strategy) that the majority of waste facilities will be built. Within the more constrained areas, the Waste policy framework identifies a need for more localised, smaller scale waste management facilities. Links to other plans and strategies are continually being developed (e.g. the emerging Wiltshire Core Strategy). See document library (document references WAS/29; WAS/26).
33. Does the development plan document take into account matters which may be imposed by circumstance, notwithstanding the council's views about the matter?	 i. Explicit recognition within the development plan document that this may happen, and clear information about how the plan strategy can accommodate them ii. Consideration of the options in relation to such matters as part of the evaluation of alternatives in a report on the preferred strategy 	The DPD reflects policy direction from European, national, regional and local sources.
Flexible		
34. Is the development plan document flexible enough to	Sections of the development plan document setting out the assumptions of the plan and identifying the	Yes. The DPD has been specifically designed to be flexible and not prescriptive. The needs of

recognized to a verificity of an	civation and talk and maliaida might not altala	as sister and industry, are constantly about the
respond to a variety of, or unexpected changes in,	circumstances when policies might need to be reviewed	society and industry are constantly changing. In addition, the speed of change within the waste
circumstances?	ii. Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor: Output Description:	industry surely dictates that a plan which slavishly adheres to specific technology or management techniques would be bound to fail.
	 the effectiveness of policies and what evidence is being collected to undertake this 	
	 changes affecting the baseline information and any information on trends on which the development plan document is based 	
	 iii. Statements or correspondence from stakeholders which commit to providing information to be used in monitoring the progress of the policies and changes in the baseline 	
	 iv. Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances 	
35. Is the development plan document sufficiently flexible to deal with any changes to, for example, housing figures from an emerging regional special strategy?	 i. Sections within the development plan document dealing with possible change areas and how they would be dealt with, including mechanisms for the rate of development to be increased or slowed and how that would impact on other aspects of the strategy and on infrastructure provision ii. Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances 	Yes. The strategy is geared towards managing waste as close as practicable to where it arises. Therefore, the choices that have been made in terms of where waste facilities should be located (through the application of Waste Core Strategy policies WCS2, WCS3) are aligned to the fact that the majority of growth will take place at Swindon, Chippenham, Trowbridge and Salisbury.
		In addition, the identification of 35 sites for potential future waste management development demonstrates that the councils have considered the sustainability benefits of reducing vehicle mileage. The alternative approach would have been to identify fewer, larger-scale facilities.
36. Does the development plan document include the remedial actions that will be taken if the strategies/policies are failing?	 i. A section of the development plan document which expressly addresses flexibility ii. Sections of the development plan document identifying the key indicators of success of the 	Yes. The DPD sets out a monitoring framework which, along with the councils AMR processes will be used to ensure that policies and proposals are keeping abreast of changing circumstances.

	strategy, and the remedial actions which will be taken if they are failing	
Monitoring		
37. Does the development plan document contain targets and milestones that relate to the delivery of the policies, including housing trajectories where the plan contains housing allocations?	 i. Sections of the development plan document setting out indicators, targets and milestones ii. Sections of the current annual monitoring report which report on indicators, targets, milestones and trajectories iii. Reference to any other reports or technical documents which contain information on the delivery of policies 	No. Unlike the emerging Core Strategies being produced by the councils for wider development needs, the Waste Site Allocations DPD is not driven by national policy targets for delivery.
38. Is it clear how these are to be measured and are these linked to the production of the annual monitoring report?	 i. Sections of the development plan document setting out indicators, targets and milestones ii. Sections of the current annual monitoring report and the sustainability appraisal report setting out the framework for monitoring, including monitoring the effects of the development plan document against the sustainability appraisal iii. Reference to any other reports or technical documents which contain information on the collection or measurement of indicators 	As above. The councils will use the AMR process to chart the success / failure of the Waste Development Framework as a whole. In the broadest sense, the councils will be looking to ensure that sufficient sites are being developed to keep pace with the volume of waste arisings being generated.
39. Are suitable targets and indicators present (by when, how and by whom)?	 i. Sections of the development plan document setting out indicators, targets and milestones ii. Sections of the current annual monitoring report that report on indicators, targets, milestones and trajectories 	As above.

National policy		
40. Does the development plan document contain any policies or proposals that are not consistent with national planning policy?	 i. Sections of the development plan document which refer to planning policy statements and justify why any policies are not consistent with national policy ii. Sustainable community strategy, studies forming evidence for the development plan document or 	In the opinion of the councils – no.

41. If yes, is there a local justification?	other information which provide the stimulus for departing from national planning policy
	iii. Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community involvement
	 iv. Representations from the Government Office on the preferred strategy or the submitted development plan document
	 Reports or copies of correspondence as to how Government Office representations have been considered and dealt with
42. Does the development plan document contain policies that do not add anything to existing	 i. Sections of the development plan document which explain where and how national policy has been elaborated upon and the reasons
national guidance?	ii. Representations from the Government Office
43. If so, why have they been included?	iii. Reports or copies of correspondence as to how the representations have been considered and dealt with