



The Planning  
Inspectorate

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# Report to West of England Partnership

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an Inspector appointed by the Secretary of State for Communities and Local Government

Date 3rd February 2011

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**PLANNING AND COMPULSORY PURCHASE ACT 2004**

**SECTION 20**

**REPORT ON THE EXAMINATION INTO THE  
WEST OF ENGLAND JOINT WASTE CORE STRATEGY  
DEVELOPMENT PLAN DOCUMENT**

Document submitted for examination on 30 July 2010

Examination hearings held between 16 and 23 November 2010

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## **ABBREVIATIONS USED IN THE REPORT AND APPENDICES**

AA	Appropriate Assessment
AONB	Area of Outstanding Natural Beauty
BAP	Biodiversity Action Plan
CD	Core Document
CD&E	Construction, demolition and excavation (waste)
DPD	Development Plan Document
EB	Prefix for Evidence Base document or additional supporting evidence document
ha	hectares
HRA	Habitats Regulations Assessment
JWCS	Joint Waste Core Strategy
LDS	Local Development Schemes
para	paragraph
PC	Proposed Change
PPS	Planning Policy Statement
RSS	Regional Spatial Strategy
SA	Sustainability Appraisal
SCI	Statements of Community Involvement
SCS	Sustainable Community Strategies
tpa	tonnes per annum
UK	United Kingdom
WEP	West of England Partnership
WSE	Waste Strategy for England (2007)

## **Non-Technical Summary**

This report concludes that the West of England Partnership Joint Waste Core Strategy Development Plan Document provides an appropriate basis for the waste planning of the area over the next 15 years. The Partnership has sufficient evidence to support the strategy and can show that it has a reasonable chance of being delivered.

A limited number of changes are needed to meet legal and statutory requirements. These can be summarised as follows:

- Making the vision locally distinctive and stating the intended sphere of influence of the plan;
- Setting out an indicative quantitative requirement for waste management facilities of different types and at different dates;
- In respect of the former Fuller's Earth site, Bath, having full regard to the Cotswolds Area of Outstanding Natural Beauty and the City of Bath World Heritage Site and its setting;
- Identifying types of waste development that would be inappropriate in the Strategic Areas;
- Clarifying provision in respect of hazardous waste;
- Clarifying and making more positive the framework for considering proposals for landfill and landraising;
- Securing accordance with Government guidance on planning obligations; and
- Providing for effective monitoring of the delivery of waste management facilities, the timing of provision and waste prevention.

All of the changes recommended in this report are based on proposals put forward by the Partnership in response to points raised and suggestions discussed during the public examination. The changes do not alter the thrust of the Partnership's overall strategy.

## Introduction

1. This report contains my assessment of the West of England Joint Waste Core Strategy Development Plan Document (DPD) in terms of Section 20(5) of the Planning and Compulsory Purchase Act 2004. It considers whether the DPD is compliant in legal terms and whether it is sound. Planning Policy Statement (PPS) 12 (CD5, Paragraphs 4.51-4.52) makes clear that to be sound, a DPD should be justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the West of England Partnership (representing the councils of Bath & North East Somerset, Bristol, North Somerset and South Gloucestershire) has submitted what it considers to be a sound plan. The basis for my examination is the Submission Document (EB1, July 2010). This is an amended version of the Pre-Submission (consultation) Document (January 2010). No additional consultation or revision of the Sustainability Appraisal were deemed necessary in regard to the Submission Document.
3. My report deals with the changes that are needed to make the DPD sound and they are identified in bold in the report (**PC**). All of the changes have been proposed by the Partnership and are presented in Appendix A. None of these changes should materially alter the substance of the plan and its policies or undermine the sustainability appraisal and participatory processes undertaken.
4. Some of the changes put forward by the Partnership are factual updates, corrections of minor errors or other minor amendments in the interests of clarity. As these changes do not relate to soundness they are generally not referred to in this report although I endorse the Partnership's view that they improve the plan. These are shown in Appendix B. I am content for the Partnership to make any additional minor changes to page, figure and paragraph numbering and to correct any spelling errors prior to adoption.
5. Where the Partnership has proposed changes that go to soundness they have been subject to public consultation and I have taken the consultation responses into account in writing this report.

## Assessment of Soundness

### Preamble

6. The approved Regional Spatial Strategy for the South West<sup>1</sup> dates from 2001. It was due to be replaced following consideration of the Draft Regional Spatial Strategy for the South West 2006 – 2026 (CD7). However, shortly before publication of the Joint Waste Core Strategy Submission Document (EB1), the Secretary of State for Communities and Local Government sought to revoke all regional strategies. This is a decision since overturned in the High Court.
7. Irrespective of the revocation or otherwise of regional strategies, the Partnership has determined that the principles and aims with regard to waste

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<sup>1</sup> Regional Planning Guidance for the South West (RPG 10), September 2001

management in the Draft Regional Spatial Strategy for the South West and the work associated with it provide a sound basis for consideration of the Joint Waste Core Strategy. My report has been prepared on this basis.

## **Main Issues**

8. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings, I have identified seven main issues upon which the soundness of the plan depends.

### **Issue 1 - Whether the Vision and Strategic Objectives are sufficiently focussed, spatial and locally distinctive; also whether they address adequately matters of self-sufficiency and timely provision**

9. Paragraph 2.1 of PPS 12 (CD5) offers guidance on local spatial planning. One aim is to produce a vision for the future of places that, amongst other things, is based on a sense of local distinctiveness. As drafted, the vision in the Joint Waste Core Strategy is not locally distinctive. But for the words "West of England" the vision could be said to apply to almost any part of the country.
10. In recognition of this point, the Partnership has suggested reference to various matters of importance in the West of England. These include the need to enable sustainable economic growth; also to protect the natural and historic environments which are the area's most distinctive and unique assets.
11. The visions of many core strategies contain much more information on the essential assets of the respective areas and their communities. Nevertheless, I support the change proposed by the Partnership (PC5). Through the change there would be accordance with Government guidance on the production of an overall vision.
12. A further issue is uncertainty over the intended sphere of influence of the strategy. For example, is the strategy aiming to make provision for the management of waste from outside the West of England area; or is the aim one of self-sufficiency? The Partnership has addressed this matter through a change that is also part of PC5. The intention is to operate a waste management infrastructure with sufficient capacity to deal with the amount of waste generated in the West of England. This clarification is central to the delivery of an effective strategy.
13. In the future there will still be cross-boundary movements of waste. However, by providing capacity equivalent to the amount of waste generated in the plan area, the Partnership authorities will be able to move towards self-sufficiency. In accordance with PPS 10 (CD3, Para 2), provision would be made "in the right place".
14. Whether provision would be made "at the right time" has also been raised in connection with this issue. In this respect, the delivery of timely provision is one of the Strategic Objectives. The carrying forward of this objective into the main provisions of the plan is discussed below. However, in regard to the matters raised above, the proposed changes would bring the Joint Waste Core Strategy into line with Government guidance and ensure soundness. The Partnership's Proposed Change 5 (**PC5**) is endorsed; also a related change to supporting text (**PC11**).

**Issue 2 – Whether there is clarity over the amount and type of waste management facilities that are likely to be required and the timing of their provision; also adequacy of coverage within the Core Strategy and justification through a robust and credible evidence base**

15. One of the key elements of a core strategy is a strategy for delivering the strategic objectives. This should set out how much development is intended to happen where, when and by what means (PPS 12 [CD5], Para 4.1). In terms of PPS 10, there is a recognised need for a step-change in the way waste is handled and significant new investment in waste management facilities. The sustainable waste management can be delivered, amongst other things, by providing sufficient opportunities for new waste management facilities of the right type, in the right place and at the right time (CD3, Paras 1 and 2).
16. In connection with the Joint Waste Core Strategy, much work has been done on the amounts of waste of different types that will need to be managed in the West of England and on changes over time. The principal source of this information is the West of England Waste Management Capacity Needs Assessment (EB10). In addition, a Topic Paper was prepared specifically for the plan examination. This is entitled "West of England approach to identifying future Capacity Requirements for the Joint Waste Core Strategy" (WEP 003).
17. Notwithstanding the availability of relevant information in the evidence base, the Submission Document (EB1) contains little specific information on the amounts of different wastes that will need to be managed or on how such amounts are likely to change over time. However, the inclusion of such information is essential if timely provision is to be made and if proper monitoring of the delivery of the strategy is to take place.
18. The Partnership's initial response to this matter was to suggest the inclusion, in the monitoring section of the plan, of tables showing capacity requirement at five-year intervals from 2010/11 to 2025/26. There would have been no indication of current capacity. In addition, both inert and non-inert landfill would have been included in the same table. More particularly, the tables would have been relegated to the monitoring section and would not have formed part of the main policy content of the plan.
19. The change now proposed by the Partnership is to include tables showing the capacity requirement in the main policy section of the strategy (Section 6). There would be separate tables dealing with recycling and composting of municipal waste and commercial and industrial waste; recycling of construction, demolition and excavation waste; recovery of municipal waste and commercial and industrial waste; disposal of hazardous and non-hazardous wastes; and disposal of inert waste. The requirement at "spot" dates of 2010/11, 2015/16, 2020/21 and 2025/26 would be shown. Each table would give an indication of current capacity and an explanation of the provisions.
20. I endorse the Partnership's related changes (**PC63, 64, 65, 66 and 82**). By embedding the changes in the main body of the plan, the provisions would be an integral part of the policy on residual and non-residual waste and on landfill. There would be clarity over the quantitative expectations of the Partnership and the changing position over time. In addition, the current shortfall or surplus in capacity for each type of waste would be highlighted. In accordance

with Government guidance, there would be a clear indication of how much waste development is envisaged and steps to ensure timely delivery.

### **Issue 3 – Whether justifiable and sufficient provision has been made for the development of waste recovery facilities of appropriate types and at appropriate preferred locations or strategic sites**

21. In considering whether justifiable and sufficient provision has been made for the development of waste recovery facilities of appropriate types and at appropriate preferred locations or strategic sites, attention has focussed on the proposed allocation under Policy 5 of the former Fuller's Earth site on the southwestern fringe of Bath and on the Strategic Areas (Area A, Yate, in particular). The provisions in respect of adopted urban extensions also proved controversial although reference to these areas in the plan has now been dropped.
22. The former Fuller's Earth site is subject to a number of constraints. Amongst other things, reference has been made to the ecological value of the site; its geological importance; its location relative to the Cotswolds Area of Outstanding Natural Beauty and any extension of the AONB; the presence of a major aquifer; its location within the Green Belt; and the potential effect on the setting of the nearby City of Bath World Heritage Site. Additional concerns include the alleged carrying out of unauthorised development (the subject of enforcement action<sup>2</sup>) and the fact that the previously envisaged growth of the area may not occur.
23. The Partnership recognises that the site is constrained. Its approach has been to set down key development criteria, specific to the site, which would need to be taken into account in any scheme of development. The location is seen as important. It would serve the needs of the south east of the plan area as well as the area as a whole. In terms of the enforcement action, this relates to two specific areas of the site. It can be distinguished from the plan proposal, an allocation that has the support of Bath & North East Somerset Council (the enforcement authority).
24. Irrespective of the future growth of Bath, I recognise that an allocation in this location would be a contribution towards an appropriate geographical spread of strategic sites. In addition, there would be controls over future development such that significant problems associated with any unlawful activities could be avoided.
25. In terms of the impact on the environment, I see no reason in principle why an acceptable development could not come forward. I support the approach of the Partnership and the identification of key development criteria. Under Policy 5, the future development of residual waste treatment facilities at the site would be subject to these criteria as well as the development management policies. However, for the provisions to be effective, it would be necessary to have full regard to the Cotswolds Area of Outstanding Natural Beauty and the City of Bath World Heritage Site and its setting. This is the subject of a proposed change by the Partnership (**PC70**) which I hereby endorse.

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<sup>2</sup> The enforcement notices were subsequently quashed by the High Court (Order issued 3 December 2010)

26. With the change suggested by the Partnership, the plan would be sound. On a related matter, I see no need to extend the boundaries of the allocated site. From a developer's point of view, I can see the sense of locating infrastructure such as balancing ponds on adjacent land. However, any scheme would have to be considered on its merits. Bearing in mind also the Green Belt location, it would be wrong to anticipate the acceptability of forms of development different from those assessed through preparation of the Joint Waste Core Strategy.
27. Turning to the strategic areas, recurrent concerns were lack of specificity over the sites or facilities that could be developed. This would have a blighting effect and lead to uncertainty. In addition, it was argued that there had been a failure to consider reasonable alternatives and effects under the Habitats Regulations and to engage the public in meaningful consultation.
28. In response, the Partnership has put forward a number of proposed changes. These include making reference to any local development document relevant to the strategic area. I would expect this change to address the blight argument. For example, there would be a need for harmony with plans for the industrial land at Yate that are coming forward under the emerging core strategy for South Gloucestershire.
29. In terms of the Habitats Regulations, there would be explicit recognition that some sites may not be appropriate for thermal treatment. I appreciate that this qualification would be set out in the key development criteria in Appendix 1 of the plan rather than in Policy 5 itself. Nevertheless, the plan makes clear the need to abide by the Habitats Regulations Assessment (EB8). In this regard, any significant effects (including in-combination effects) not covered by the scope of the assessment would have to be the subject of separate assessment or screening.
30. On the question of considering reasonable alternatives, I would expect broad options to the strategy as a whole to have been examined. In this regard, the Sustainability Appraisal (EB3.1-3.4) has assessed a range of "concentrated", "dispersed" and "combination" options. I would not expect to see strategic appraisal of competing options within a particular industrial area such as that at Yate. Here, an overall assessment of constraints and opportunities such as that presented in Table D.13 of the Sustainability Appraisal (EB3.3, Page D9) would be appropriate. I find that the plan presents the most appropriate strategy when considered against reasonable alternatives and is sound in this regard.
31. Within the Joint Waste Core Strategy as proposed to be changed, there is no intention to identify the advantages or disadvantages of particular sites. All sites are covered by the generality of the provisions and the restrictions that apply. This is the clear basis upon which the public has been consulted.
32. On the Strategic Areas, I endorse the related changes that have been proposed by the Partnership (**PC52, 53, 54, 55, 56 and 83**). Through these changes there will be greater clarity and specificity as well as the removal of uncertainty. In this regard, the strategic intentions of the Partnership would be deliverable and the soundness of the plan assured.



33. Before leaving the subject of Policy 5, I would comment on the Partnership's decision to omit reference to adopted urban extension areas. This was the subject of discussion at the examination hearings notably at the session on non-residual waste treatment facilities.
34. I note uncertainty over the future of regional strategies, the promotion of urban extensions by local planning authorities and use of the specific term "urban extension areas". Given this uncertainty, it makes sense to drop precise reference to such areas. As an alternative, Proposed Changes 79-81 would refer to the potential appropriateness of locating waste activities within areas of new development (which could include areas previously known as urban extensions). I agree that this is the way forward. However, the related changes do not affect the soundness of the plan.
35. Separate concerns have been raised as to whether Policies 6 and 7 are appropriate. Policy 6 deals with operational expectations in relation to residual waste treatment facilities and touches on the matter of market demand. In this regard, both PPS 10 (CD3, Para 22) and the climate change supplement to PPS 1<sup>3</sup> indicate that applicants should not be required to demonstrate a need.
36. A careful reading of the policy indicates that there is a requirement to present information on the outputs of the proposed facility rather than to demonstrate a need. Normally, such information would be expected within any application for a recovery facility and would lead to an understanding of any benefits in terms of the materials to be produced or the energy to be generated. The Partnership authorities would also have information relevant for monitoring purposes. There would be no conflict with Government guidance and the plan is sound in this respect.
37. In terms of Policy 7, the Companion Guide to PPS 10 (CD4, Para 8.15) indicates that waste planning authorities may find it helpful to have set out specific policy on non-allocated sites. The key test in considering proposals is consistency with PPS 10 and the waste planning authority's core strategy (CD4, Para 8.14). These are matters addressed in Paragraph 6.9.6 of the Submission Document (EB1) and in Policy 7 itself. The policy is necessary, in line with Government guidance and sound.

**Issue 4 - Whether adequate and robust provision has been made for the receipt, treatment and disposal of hazardous waste and for the consideration of related development proposals**

38. In terms of hazardous waste, reliance is presently placed on management facilities outside the West of England, for example, in Gloucestershire. However, on-going availability cannot be relied upon. In any event, in order to meet the needs of the West of England, provision needs to be made within the sub-region. This is in circumstances where additional hazardous waste would be produced as a residue from energy from waste facilities. There have been calls for a specific policy on what is seen as a significant issue.

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<sup>3</sup> Planning Policy Statement: Planning and Climate Change – Supplement to Planning Policy Statement 1 (CD1), December 2007, Para 20

39. For my part, I note that Paragraph 6.4.6 (was Paragraph 6.4.8) of the Joint Waste Core Strategy points to the policy framework for bringing forward hazardous waste treatment facilities. In addition, the Partnership is intending to clarify the text to confirm that Policies 8 and 9 provide the relevant framework to meet the hazardous waste disposal needs of the sub-region.
40. I appreciate that the Partnership could have given a more positive steer to the provision of hazardous waste management facilities. Nevertheless, I consider that the essential ingredients are in place. The change proposed would ensure that the strategy would be deliverable. I endorse the Partnership's related change (**PC68**).
41. Whilst on the subject of hazardous waste, I note that the plan deliberately excludes consideration of radioactive waste. Given the existing and possible future presence of nuclear power facilities in the West of England, this could be considered to be a serious omission. However, I acknowledge that policy on the management of higher activity waste is essentially outside the remit of waste planning authorities and resides with central Government. In this regard, the plan makes reference to the 2008 White Paper on managing radioactive waste safely. The Partnership will need to keep abreast of developments in this area.

**Issue 5 – Whether there are clear, sufficient and robust arrangements for landfill, landraising and restoration with adequate spatial guidance and regard to the timeliness of provision**

42. In the Submission Document (EB1), the approach of the Partnership to landfill and landraising has been to facilitate necessary provision through criteria based policies (Policies 8 and 9). However, in the face of limited and short-term capacity, there have been demands for a greater commitment to landfill, for example, through the mechanism of a separate and specific landfill development plan document; also a less restrictive policy context.
43. Through a landfill DPD it would be possible to detail how the related capacity gap would be met and to make formal and pro-active provision. Be that as it may, such action could be considered premature and unnecessary. A criteria-based approach is a common way of securing provision. Notwithstanding an apparent lack of willingness on the part of the waste industry to suggest potential allocations at the consultation stages of the plan, I have no reason to suppose that sites will not come forward. Alternative action could be taken if and when monitoring indicates lack of an appropriate response.
44. To provide a more positive context, the Partnership is proposing several changes to the plan. Whilst recognising that a key aim of the plan is to divert waste away from landfill, there would be express recognition that additional landfill capacity will be required. This would be quantified in Tables 6.4 and 6.5 and clarified in the accompanying text. In addition, there would be changes to Policies 8 and 9 and in the reasoned justification. Of particular importance would be a recognition that opportunities on brownfield land may be limited and that greenfield land may be required to deliver the sub-region's needs.
45. Under the up-dated plan proposals, landfill will be possible on suitable unconstrained sites outside major aquifers, source protection zones, European

sites of nature designation or the appropriate buffer as identified in Figure 6.2. Early and on-going provision will be required to provide the quantities set out in Tables 6.4 and 6.5 by the indicative dates. In terms of sites, the Partnership is confident that suitable schemes will come forward. However, the waste industry has a paramount role. The Partnership will have to revisit its approach to all forms of landfill if regular monitoring shows an absence of real progress.

46. With the changes now proposed, there would be a clearer and less restrictive framework for the provision of landfill sites and for landraising. In accordance with Government guidance, it is more likely that the strategy would be deliverable. I endorse the Partnership's proposed changes (**PC2, 73, 75 and 76**).

**Issue 6 – Whether there are clear and appropriate development management policies that, amongst other things, accord with and do not repeat or reformulate national policy**

47. The main provisions in respect of development management are to be found in Policy 11 (Planning Designations), Policy 12 (General Considerations) and in the related supporting text. Several improvements, not affecting soundness, have been proposed by the Partnership. These are set out in Appendix B.
48. One of the matters touched upon in the text of the Submission Document (EB1, Para 6.14.4) is that of legal agreements. In this regard, the main source of Government policy is Circular 05/2005, "Planning Obligations". Paragraph B25 of Annex B of the Circular advises that general policies about the principles and use of planning obligations should be included in development plan documents if these are not already covered by saved policies. The adequacy of coverage in this respect was the subject of discussion at the examination hearings.
49. It is now clear that the main provisions on planning obligations will be set out in the core strategies and developer contribution supplementary planning documents of the Partnership authorities. Matters relevant to waste development will be dealt with as well as general considerations. However, within the Joint Waste Core Strategy, there is no clear reference to the matters to be covered by obligations or to the role of other development plan documents.
50. The Partnership is proposing to address this matter through Proposed Changes 31b and 62. Reference would be made to the role of planning obligations in mitigating impacts; to the matters to be covered by waste-related planning obligations; to the core strategies of the individual Partnership authorities; and to developer contribution supplementary planning documents. In this way there would be accordance with Government guidance. I endorse the Partnership's proposed changes (**PC31b and 62**).

**Issue 7 – Whether there are clear arrangements for managing and monitoring the delivery of the strategy**

51. Absent from the Submission Document (EB1) is an accurate indication of the waste management capacity that it is envisaged would be required through the plan period. As discussed in relation to Issue 2 above, this omission would be

dealt with by the inclusion, in the main policy section of the Joint Waste Core Strategy, of tables dealing with the principal types of waste to be dealt with in the West of England.

52. In assessing progress towards the achievement of the indicative capacity figures, the timeliness of provision and the effectiveness of the strategy, it will be necessary to monitor on-going development. Through Proposed Change 35, the Partnership would explicitly recognise that the tables would underpin monitoring of the spatial strategy and delivery of the waste management infrastructure. In this way, the Joint Waste Core Strategy would be able to be monitored in line with Government guidance. I endorse the Partnership's proposed change **(PC35)**.
53. A further concern relates to effective monitoring of Policy 1 (Waste Prevention). Under the Submission Document (EB1) the proposed indicator is the percentage of approved developments with a waste audit that make on-site provision for waste segregation, recycling and recovery. However, monitoring of the percentage would not show the effectiveness or otherwise of the policy. The Partnership's proposed change is to record the type and amount of provision made. I endorse this change **(PC77)**. In this way effective monitoring would be achieved in line with the guidance in PPS 12 (CD5).
54. On a final note, it is worth stressing the importance of effective monitoring. The strategy is heavily dependent upon private sector market responses to criteria-based policies. Some representors have questioned whether the plan goes far enough in encouraging the provision of waste management facilities. In this respect, it is only through dedicated monitoring and any necessary adjustment of the strategy that the true success of the Partnership's intentions will be realised.

## Legal Requirements

55. My examination of the compliance of the Joint Waste Core Strategy with the legal requirements is summarised in the table below. I conclude that the Joint Waste Core Strategy meets them all.

<b>LEGAL REQUIREMENTS</b>	
Local Development Schemes (LDS)	The Joint Waste Core Strategy is identified within the approved LDS of the Partnership authorities. These date from between March 2007 and January 2010. A revised timetable for the later key stages has been endorsed subsequently as an addendum to the schemes. The expected adoption date is April 2011. The content and timing of the Joint Waste Core Strategy are compliant with the LDS as amended.
Statements of Community Involvement (SCI) and relevant regulations	The SCI were adopted in 2007 or 2008 and consultation has been compliant with the requirements therein, including the consultation on the post-submission proposed changes (PC).

Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Appropriate Assessment (AA)	Following screening, AA was carried out under the Habitats Regulations (Final Report, August 2009).
National Policy	The Joint Waste Core Strategy complies with national policy except where indicated and changes are recommended.
Sustainable Community Strategies (SCS)	Satisfactory regard has been paid to the SCS.
Regional Spatial Strategy (RSS)	The Joint Waste Core Strategy is in general conformity with the RSS.
2004 Act and Regulations (as amended)	The Joint Waste Core Strategy complies with the Act and the Regulations.

## Overall Conclusion and Recommendation

**56. I conclude that, with the changes proposed by the Partnership set out in Appendix A, the West of England Joint Waste Core Strategy DPD satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in PPS 12. Therefore I recommend that the plan be changed accordingly. For the avoidance of doubt, I endorse the Partnership's proposed minor changes as set out in Appendix B.**

*Andrew S Freeman*

INSPECTOR

This report is accompanied by:

Appendix A (separate document): Partnership's Changes that go to soundness

Appendix B (separate document): Partnership's Minor Changes