

MILTON KEYNES WASTE DEVELOPMENT PLAN DOCUMENT – SOUNDNESS SELF ASSESSMENT

Test 1: The DPD has been prepared in accordance with the Local Development Scheme.

Key Questions	Response / Comments	Evidence
1. Is the DPD identified in the Authority's Local Development Scheme (LDS)?	1. Yes. The WDPD is identified in the LDS.	1. Milton Keynes Local Development Scheme 2006-2009 (Table 3, page 13 & Appendix A, page 30)
2. Have the details set out in the LDS such as the role, rationale or scope of the DPD been met?	1. Yes. THE LDS states that the WDPD will set out how the waste management requirements for Milton Keynes will be achieved and will identify sites for facilities to meet these requirements.	1. Milton Keynes Local Development Scheme 2006-2009 (Appendix A, page 30)

Test 2: The DPD has been prepared in compliance with the Statement of Community Involvement (SCI), or with the minimum requirements set out in the Regulations where no SCI exists.

Key Questions	Response / Comments	Evidence
1. Having regard to the nature of the DPD, have all of the relevant consultation/participation procedures set out in the Statement of Community Involvement (SCI) been carried out?	1. Yes. The Strategy is compliant with the requirements of the adopted SCI. Although the SCI was adopted in December 2006, the content of the emerging and final document was taken into account in the WDPD.	1. Statement of Community Involvement, December 2006. 2. Regulation 28 Milton Keynes Waste Development Plan Document, Consultation Statement, January 2007 which sets out compliance with Regulations 25, 26 & 27.
2. If no SCI exists have the minimum requirements of the Town and Country Planning (Local Development)(England) Regulations 2004 been met?	1. A SCI exists.	1. See above.

Test 3: The Plan and its policies have been subjected to Sustainability Appraisal

Key Questions	Response / Comments	Evidence
<p>1. Has Sustainability Appraisal (SA) been carried out in relation to the particular DPD in question?</p>	<p>1. Yes, the WDPD and the policies have been subjected to SA.</p>	<p>1. Milton Keynes Council. Sustainability Appraisal of Waste Development Plan Document, Sustainability Appraisal Report, July 2006</p> <p>2. Combined Scoping Report Sustainability Appraisal/Strategic Environmental Assessment, September 2005.</p> <p>3. Milton Keynes Council Sustainability Appraisal of the Waste Development Plan Document Supplementary to Sustainability Appraisal Report: Appraisal of Waste Development Plan 2007-2026, Submission Draft, January 2007</p>

Test 4: It is a spatial plan which is consistent with national planning policy and in general conformity with the RSS for the region or the Spatial Development Strategy if in London, and it has properly had regard to any other relevant plans, policies and strategies relating to the area or to adjoining areas.

(a) It is a spatial plan which has regard to other relevant plans, policies and strategies.

Key Questions	Response / Comments	Evidence
<p>1. Does the DPD reflect the guidance on spatial planning which is set out in national policy?</p>	<p>1. The WDPD contains a clearly set out suite of guiding principles and an appropriate vision. The plan embraces the concept of spatial planning and go beyond simply land use planning (CS16 & CS17 in the WDPD).</p> <p>2. The WDPD provides a context and relationship to other plans and strategies at Section 3 and takes into account the needs of the community of Milton Keynes and sustainable design and construction. The guiding principle and vision and ensuing policies address the social, environmental and economic approach to waste management.</p> <p>3. The process has been participative and various means of community</p>	<p>1. The WDPD, guiding principles and vision.</p> <p>2. Sections 2 & 3 of the WDPD.</p> <p>3. The Consultation Statement (under Regulation 28) sets out the participative approach to the preparation of the strategy.</p>

	<p>engagement and consultation exercises have been carried out at all stages of the WDPD processes.</p> <p>4. The core strategy, site allocations and development control policies are encompassed in one document demonstrating that the strategy is deliverable. The WDPD addresses the means by which the Plan will be monitored and implemented (Appendix 1).</p> <p>5. The Issues and Options and Preferred Options stages clearly set out the national and regional policy context.</p>	
<p>2. Has adequate account been taken of the relationship between the proposals in the DPD and other requirements, such as those of utility companies and agencies providing services in the area including their future plans or strategy and any requirements for land and premises, which should be prepared in parallel?</p>	<p>1. The preparation of the WDPD has been informed by a number of technical/background documents, including relevant national policy, RPG9 and emerging South East Plan and associated background documents. Regard has also been had to the Milton Keynes Council Municipal Waste Strategy December 2005, the Milton Keynes Local Development Framework, The Milton Keynes Local Plan, The Local Transport Plan and Buckinghamshire</p>	<p>1. Section 3 and References and Links referred to in the WDPD which differentiate between the different stages.</p>

	<p>and Milton Keynes Biodiversity Action Plan 2000-10</p> <p>2. Discussions with Anglian Water informed the wording in the WDPD regarding and was agreed verbally (paragraph CS36)</p>	
<p>3. Is it clear how the DPD relates to other plans and strategies such as local transport plans which will influence the delivery of policies and proposals within the plan?</p>	<p>1. The relevant strategies are identified in the response above and the WDPD describes how it relates to each of these.</p> <p>2. The relevant bodies, agencies and organisations responsible for the preparation of these strategies and plans were consulted during the preparation of the WDPD.</p>	<p>1. Section 3 of the WDPD.</p> <p>2. Responses from the relevant bodies received during the WDPD preparation. Milton Keynes Waste Development Plan Document, Consultation Statement, January 2007.</p>
<p>4. In two tier areas does the DPD integrate effectively with plans prepared by the county council/district council.</p>	<p>1. The WDPD relates to a unitary authority.</p>	

(b) It is consistent with national planning policy

Key Questions	Response / Comments	Evidence
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1. Does the DPD contain any policies or proposals which are not consistent with national planning policy and, if so, is there a local justification?	1. No – the WDPD conforms to national policy.	1. WDPD and associated policies. 2. Consultation response from GOSE indicates inconsistency with Policy in PPS12. A meeting is scheduled to address these matters.
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(c) The plan is in general conformity with Regional Spatial Strategy or, where relevant, the Spatial Development Strategy in London.

Key Questions	Response / Comments	Evidence
1. Does the DPD contain any policies or proposals which are not in general conformity with the RSS, or SDS in London? If so, is there a local justification?	<p>1. The approved Regional Planning Guidance for the South East (RPG9) Waste and Minerals, June 2006 has been taken into account along with the emerging policy in the South East Plan.</p> <p>2. In terms of London's exported waste, the supporting text of Policy W3 Regional Self-sufficiency refers to a sub-regional apportionment, but there are no specific figures included. The WDPD does refer to the Council's objection to the current proposed apportionment; nevertheless the document has built in flexibility to incorporate any future requirements</p>	<p>1. The WDPD.</p> <p>2. Consultation response from SEERA indicates an issue of non-general conformity relating to provision to deal with London's waste. SEERA has requested a meeting (now scheduled) to explore the options for overcoming this matter and if agreement can be reached over amendments the Assembly will withdraw its objection.</p> <p><i>Note: the Report on the Examination into Hampshire's Core Strategy assists in identifying a form of wording to addressing this matter and the Council is confident that issues raised by</i></p>

	emerging from the SE Plan. This flexibility is welcomed by the GOSE.	<i>GOSE and SEERA can be overcome prior to the examination.</i>
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Test 5: It has had regard to the Authority's Community Strategy.

Key Questions	Response / Comments	Evidence
1. Does the DPD have regard to the Community Strategy, by setting out policies which deliver key components of that strategy so far as they are consistent with or in general conformity with higher level planning policy and relate to the use and development of land?	1. Yes. The WDPD is a key component in the delivery of the Milton Keynes Community Strategy.	1. Paragraphs CS6-CS17 in the WDPD, in particular. 2. Key themes in the Milton Keynes Community Strategy 2004-2034 include participative citizenship, sustainable development, designing and planning together to promote a modern, safe and environmentally sustainable city. These are addressed through the policies in the Plan.

Test 6: The strategies/policies/allocations in the plan are coherent and consistent within and between Development Plan Documents prepared by the authority and by neighbouring authorities, where cross boundary issues are relevant.

Key Questions	Response / Comments	Evidence
1. Do the policies clearly relate to the objectives in the submitted DPD or a related DPD (e.g. the strategy)?	1. The WDPD is informed by a suite of guiding principles and aims. These are set out at CS16 in the WDPD document. These are supplemented by the sustainability objectives (Appendix 1 of the WDPD) and will be achieved through implementation of the policies in the WDPD.	1. The WDPD (CS16 and Appendix 1).
2. Are the policy objectives within the DPD themselves consistent?	1. The policy objectives are consistent and have been tested through the SA process.	1. The Milton Keynes Council Sustainability Appraisal of Waste Development Plan Document, Sustainability Appraisal Report, July 2006 and the Supplementary SA Report, January 2007
3. Is it clear how the DPD relates to other plans in the authority's Local Development Framework and to other relevant plans prepared by neighbouring authorities?	1. Section 3 of the WDPD clearly sets out the relationship to other strategies and the core strategy addresses the issues of cross border movements and collaborative working.	1. WDPD – Section 2 and CS43 & CS44.
4. Where there are overlaps are these consistent / complementary?	1. No overlaps have been identified.	1. The WDPD.
5. Are there any obvious gaps in the coverage of the DPD having regard to its purpose and the relevant	1. There are no gaps in the WDPD that the Council is aware of and consultees have not identified any gaps.	1. The WDPD.

<p>requirements set out in national planning policy statements?</p>		
<p>6. Is it clear how cross boundary issues are addressed?</p>	<ol style="list-style-type: none"> <li data-bbox="813 322 1422 944">1. The WDPD makes it clear as part of the guiding principles that waste is to be disposed of as near as possible to its source in line with the proximity principle and net self-sufficiency. However the WDPD states that given the capacity of non-hazardous landfill in comparison to the rest of the South East that neighbouring authorities may use facilities in Milton Keynes. Through proposed planning policy that amount of landfill required to deal with residual waste from Milton Keynes would be safeguarded at Bletchley. The Plan WDPD does provide flexibility for imports should capacity allow. <li data-bbox="813 986 1422 1305">2. The WDPD recognises that movements of waste will occur between sub-regions and are necessary to meet the Proximity Principle and sustainable transportation. This is particularly true of commercial and industrial waste. Given the relatively small area covered by the WDPD, and to obtain 	<ol style="list-style-type: none"> <li data-bbox="1440 322 2042 395">1. The WDPD, sections CS16, CS41 – CS44, A14-A18. <li data-bbox="1440 434 2042 466">2. The WDPD, sections CS43-CS44.

	economies and efficiencies of scale the WDPD recognises that it may be necessary to combine waste activities with neighbouring local authorities (see paragraphs CS41-CS44)	
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Test 7: The strategies/policies/allocations represent the most appropriate in all the circumstances, having considered the relevant alternatives, and they are founded on a robust and credible evidence base.

Key Questions	Response / Comments	Evidence
<p>1. Is it clear that the Local Planning Authority considered all reasonable options and alternatives in preparing the DPD?</p>	<p>1. A broad range of strategic options were assessed and each option was appraised against a series of sustainability criteria, referred to in the SA process as objectives and indicators. The Options were derived at various stages of the process and by various means of consultation and engagement. This Regulation 25 stage generated the options. As a result of the formal consultation further work was undertaken by the Council on suitable locations. These various options were consulted upon at the Preferred Options stage, again using a variety of methods of consultation and engagement.</p> <p>2. Between the generation of the original options and further options it is considered that the relevant options have been taken into account alongside all reasonable alternatives (including sites).</p>	<p>1. WDPD.</p> <p>2. The Sustainability Appraisal Report, July 2006 and the Supplementary to Sustainability Appraisal Report: Appraisal of Waste Development Plan 2007-2026, Submission Draft, January 2007.</p> <p>3. Consultation Statement, January 2007 which states methods of consultation and public engagement at all stages of the process.</p> <p>4. Issues and Options and Preferred Options documents which indicate those options considered and why some were selected and some rejected and the reasons for that.</p> <p>5. Consultation Report, Issues and Options and Preferred Options.</p>

<p>2. Are the assumptions in the DPD set out clearly and are they supported by evidence?</p>	<p>1. Yes.</p>	<p>1. The WDPD and the supporting technical documents referred to.</p>
<p>3. Does the evidence clearly support the policies in the DPD?</p>	<p>1. Yes. The key assumptions in the WDPD relate to the amounts and types of waste to be dealt with in the Plan period. The evidence base was built up from a number of technical documents and through engagement with the community and stakeholders. This included information gathered for the Annual Monitoring Reports.</p> <p>2. The WDPD clearly sets out the waste types and the assumed amounts of waste to be dealt with along with a reasoned justification for the quantities, cross referred to the sources of information and the evidence base.</p>	<p>1. The WDPD.</p> <p>2. Supporting and background documents.</p> <p>3. The Sustainability Appraisal Report and the Supplementary to the Sustainability Report. The SA's assessed the policies against the sustainability objectives. The SA shows that the policies in the WDPD performed well against a high proportion of the objectives. Those policies which received a single negative scoring are no longer in the WDPD.</p> <p>4. Consultation Statement dated January 2007 which sets out those issues raised at the Issues and Options and Preferred Options stages.</p>
<p>4. Is the evidence robust and credible – i.e. has it been prepared in accordance with national policy and good practice guidance?</p>	<p>1. Yes. The work has been carried out in accordance with the methodology recommended in <i>Sustainability Appraisal of regional Spatial Strategies and Development Plan</i></p>	<p>1. WDPD.</p> <p>2. The Milton Keynes Council Sustainability Appraisal of Waste Development Plan Document,</p>

	<p><i>Documents (ODPM November 05)</i> and following on from the Scoping Report the appraisal process has followed three clearly defined stages:</p> <ul style="list-style-type: none"> • Appraisal of strategic options • Appraisal of Preferred Options • The Waste Development Plan Document (supplementary to SA). <p>2. The WDPD has been prepared in accordance and in conformity with PPS12 and the companion guide and advice from GOSE and SEERA. The WDPD contains all the relevant and required sections. The WDPD has also been prepared in conformity with the PPS10 and the Companion Guide.</p>	<p>Sustainability Appraisal Report, July 2006</p>
<p>5. Where a balance has been struck in taking decisions between competing alternatives – is it clear how those decisions have been taken?</p>	<p>1. Yes. The SA Report (Sections 3 & 4) and Supplementary SA Report (Section 2) sets out the appraisal process and reasons behind the choice of options.</p> <p>2. The Consultation Statement elaborates on the issues and indicates the means of community and stakeholder engagement in the process.</p>	<p>1. The Milton Keynes Council Sustainability Appraisal of Waste Development Plan Document, Sustainability Appraisal Report, July 2006</p> <p>2. Consultation Statement, January 2007</p> <p>3. Issues and Options and Preferred Options document.</p>

	<p>3. The Preferred Options document shows how the options were developed and decisions taking in progressing to the Preferred Options stage.</p>	
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Test 8: There are clear mechanisms for implementation and monitoring.

Key Questions	Response / Comments	Evidence
1. Does the DPD contain targets and milestones which relate to the delivery of the policies, including housing trajectories where the DPD contains housing allocations?	1. The WDPD includes a range of targets and timescales.	1. The WDPD.
2. Is it clear how these are to be measured and are these linked to the production of the Annual Monitoring Report?	1. Yes. Appendix 1 sets out how the plan will be monitored and implemented and sets out the policies, indicators, targets, associated data source, the relevant SA objectives and the relevant key principles and who will implement them. The introductory section to Appendix 1 explains how the WDPD will be monitored and the results of this exercise reported in the Annual Monitoring Report.	1. The WDPD, Appendix 1 and CS57 which confirms that the LDF Annual Monitoring Report will identify the extent to which the policies are being achieved and the extent to which sites are effectively allocated and subsequently developed. This also incorporates the emerging requirement for Regional Monitoring.
3. Are the delivery mechanisms and timescale for implementation for the policies clearly identified?	1. Yes. The delivery mechanisms and targets are set out in the schedule for monitoring and implementation. The various timescales are also set out in the body of the WDPD. The allocation of sites also shows a clear means of delivery of future facilities.	1. The WDPD in general and the Monitoring and Implementation schedule at Appendix 1.
4. Is it clear who is intended to implement each policy? Where the actions	1. Yes. Appendix 1 includes a schedule for monitoring and implementation and	1. The Monitoring and Implementation schedule at Appendix 1.

<p>required to implements policy are outside the direct control of the LPA is there evidence that there is the necessary commitment from the relevant organisation to implementation of the policies?</p>	<p>clearly identifies the agency or body with responsibility / potential to implement the Policy.</p>	
<p>5. Do the processes for measuring the success of the DPD accord with national guidance?</p>	<p>1. Yes. Appendix 1 of the WDPD sets out how the WDPD will be implemented and monitored and provides a suite of performance indicators which will allow progress to be monitored. The outcomes from this will be reported in the Council's Annual Monitoring Report and Regional Monitoring which will identify the extent to which the policies and aims are being achieved.</p>	<p>1. The WDPD, Appendix 1.</p>
<p>6. Does the DPD explain how its key policy objectives will be achieved?</p>	<p>1. Yes. The WDPD provides detailed explanation in the supporting text associated with each policy. E.g. Policy WCS1 – Capacity Requirements is followed by an explanation of how this capacity will be delivered.</p>	<p>1. The WDPD and supporting text.</p>

Test 9: It is reasonable flexible to enable it to deal with changing circumstances.

Key Questions	Response / Comments	Evidence
1. Is the DPD flexible enough to respond to a variety of, or unexpected changes in circumstances?	<p>1. The policies in the DPD are written in a generic way and even in the context of the strategic and reserves sites build in sufficient flexibility to allow consideration of alternatives. The capacity analysis also includes for a 10% contingency.</p> <p>2. A number of options were considered in the preparation of the WDPD and these have been subjected to SA. In the event of a change of circumstances the sustainability implications have been assessed.</p>	<p>1. The WDPD.</p> <p>2. The Milton Keynes Council Sustainability Appraisal of Waste Development Plan Document, Sustainability Appraisal Report, July 2006 (Sections 3, 4 and 7 in particular).</p>
2. Are Development Control Policies written in a generic form to enable them to provide a robust and consistent framework for considering planning applications?	1. Yes – the Development Control policies are written in a generic way and are not specific to sites or locations.	1. The WDPD – DC1 – DC14.

**Adams Hendry Consulting Ltd (on behalf of Milton Keynes Council)
June 2007**