

# Winchcombe and Sudeley Neighbourhood Plan: Basic Conditions Statement

## Introduction

Every Neighbourhood Plan submitted for examination must be accompanied by a ‘basic conditions statement.’ Only a neighbourhood plan that meets each of the ‘basic conditions’ can be put to a referendum and, if successful, be used to assist in the determination of planning applications.

**This is the basic conditions statement for the Winchcombe and Sudeley Neighbourhood Plan. It sets out how our draft neighbourhood plan meets:**

- **the legal tests; and**
- **the requirements of each basic condition**

**and is therefore ready to proceed to referendum.**

## The legal tests

Winchcombe Town Council has led the process of making this Neighbourhood Plan for the twin parish area of Winchcombe and Sudeley and has ensured that the five legal tests are met, as follows:

- **The plan is being submitted by a qualifying body**

This neighbourhood plan has been prepared by Winchcombe Town Council for the designated area of two parishes in a neighbourhood area that covers two whole parishes – Winchcombe and Sudeley. Winchcombe Town Councillors have worked in concert with the Chair of the Sudeley Parish Meeting, whose consent was given at the start of the process and who has indicated his approval to this plan.

- **The draft neighbourhood plan sets out policies in relation to the development and use of land**

This neighbourhood plan includes land use planning policies that can be used in the determination of planning applications in all parts of the designated neighbourhood area of the two parishes of Winchcombe and Sudeley.

- **The proposed neighbourhood plan states the period in which it is to have effect**

This neighbourhood plan applies for the period 2011-2031; these dates are clearly shown on the front of the plan.

- **The policies do not relate to excluded development**

No policy in this Neighbourhood Plan relates to county matters (mineral extraction and waste development) or to any Nationally Significant Infrastructure Projects

- **The proposed neighbourhood plan does not relate to more than one neighbourhood area**

This Neighbourhood Plan does not relate to more than one neighbourhood area and there is no other neighbourhood plan in force or envisaged in the neighbourhood area covered.

## Overall compliance with basic conditions

Winchcombe Town Council has led the process of making this draft Neighbourhood Plan for the twin parish area of Winchcombe and Sudeley. The Council believes that the draft Neighbourhood Plan as a whole meets all five basic conditions that are relevant:

- **having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan**

Annex A to this Basic Conditions Statement outlines the main relevant policies and guidance issued by the Secretary of State and how the draft Neighbourhood Plan has had regard to them.

- **the ‘making’ of the neighbourhood plan contributes to the achievement of sustainable development**

The environmental report accompanying the draft Neighbourhood Plan establishes the various dimensions that together constitute sustainable development and describes how the draft policies were derived from those

- **the ‘making’ of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area)**

The formal position is that there is no up-to-date development plan in place for the Borough of Tewkesbury, but the Secretary of State has saved a number of policies. Where there were saved policies of relevance to the consultation draft plan, Tewkesbury Borough Council alerted the Town Council. The Town Council subsequently satisfied itself that their proposed policies would be in general conformity with the relevant saved policies. In pre-submission consultation between the Town Council and the Borough Council, the

Tewkesbury Borough Council subsequently confirmed that general conformity had been achieved in respect of all the relevant policies.

While not a statutory requirement, in the interests of seeking to ensure longer term general conformity with the emerging Tewkesbury Borough Plan, the Town Council has also drawn on material prepared by the principal councils in preparing a draft Joint Core Strategy for Cheltenham, Gloucester and Tewkesbury.

At Annex B is a statement of general conformity with saved and emerging Tewkesbury Borough Council policies.

**• the ‘making’ of the neighbourhood plan does not breach, and is otherwise compatible with EU obligations**

The Winchcombe Town Council considered whether their Neighbourhood Plan would require a Strategic Environmental Assessment (SEA) in accordance with the European Directive 2001/42/EC and associated Environmental Assessment of Plans and Programmes Regulations 2004; and / or a Habitats Regulation Assessment (HRA) in accordance with Article 6(3) of the EU Habitats Directive and with Regulation 61 of the Conservation of Habitats and Species Regulations 2010 (as amended). Following the relevant processes, it was concluded that an SEA would be required as policies might encourage development with a significant impact on or affecting the designated AONB area which almost surrounds the town of Winchcombe and covers all of the Parish of Sudeley. For that reason an Environmental Statement has been prepared which also meets the needs of the SEA requirement.

Neighbourhood Plans are also required to take account of European Human rights requirements. The principal parts of the European Convention on Human Rights that can be relevant to neighbourhood plans are: Article 8 (privacy); Article 14 (discrimination); and Article 1 of the first Protocol (property). In preparing the draft Neighbourhood Plan, Winchcombe Town Council have acted in an open way, but always respecting the privacy of those participating. The interests of all sectors of the community were taken into account, especially in ensuring that the Plan would take account of the needs of older and infirm people, and younger people – thus ensuring no unfair discrimination. The consultation included all locally resident people in these groups as well as some organisations outside the plan area but with responsibilities extending over the area of the draft Plan. The Council also believes that its policies will not affect property rights beyond the legitimate role of the town and country planning system in operation where policies are properly explained and justified.

- **prescribed conditions<sup>1</sup> are met in relation to the neighbourhood plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan**

There is no European site (as defined in the Conservation of Habitats and Species Regulations 2012) or any offshore marine site (either alone or in combination with other plans or projects) in or near the area of the draft Neighbourhood Plan. In responding to the Environmental Statement, Natural England notified the Town Council of only one designated site – 585 hectare Dixon Woods - several miles away at Alderton – where the woodland and grassland is well beyond the impact of any policies in Winchcombe or Sudeley parishes. These aspects are addressed in more detail in the accompanying Environmental Statement.

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<sup>1</sup> The prescribed condition is that the ‘making’ of the neighbourhood plan is not likely to have a significant effect on a European site (as defined in the Conservation of Habitats and Species Regulations 2012) or a European offshore marine site (as defined in the Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007) (either alone or in combination with other plans or projects).

## Annex A: Policy by policy assessment of general compliance with basic conditions

The Town Council recognises the need for any neighbourhood plan to be in general (rather than absolute) conformity with the strategic policies in the development plan. The current strategic policies are those saved by the Secretary of State, following the expiry of the previous Tewkesbury Borough Plan in 2011.

The Town Council has considered each of the draft policies to ensure that they do not take a different approach than those saved policies. They have been helped by the Borough Council's identification of the relevant saved policies – and these are recorded, policy by policy, in the separate document "Follow up to Public Consultation - Summary of responses to the draft Neighbourhood Plan and changes made following formal consultation" which is annexed to the Statement of Community Engagement.

The Town Council has also taken account of relevant national government policy guidance. It does not believe that any policy proposed in the draft Neighbourhood Plan is fundamentally inconsistent with national policies or guidance. The table below helps to demonstrate how national planning policy guidance has been followed in the preparation of the draft Plan.

NPPF Paragraph	Summary of Relevance to Neighbourhood Planning	How the NPPF is taken account of in the Winchcombe and Sudeley NDP
NPPF 2	Confirms the significance of the adopted development plan unless material considerations indicate otherwise	Saved policies from the latest Tewkesbury Borough Development Plan have been considered and taken into account where relevant to the NDP.
NPPF 6 – 15	Puts sustainability at the heart of the planning system and the importance of local circumstances in plans.	The NDP is intended to enable Winchcombe to thrive as a living, working town set in an outstanding environment and conserving its historic character. New jobs, better protection of natural assets, better design and improved working and living conditions are all addressed in the NDP.
NPPF 16	Refers to neighbourhood planning and seeks that communities engage with the process and develop policies for housing, economic development and positively shape and direct development that is outside the strategic elements of the local plan.	The NDP process has engaged the whole community of the two parishes of Winchcombe and Sudeley. The NDP includes policies for new housing and economic development compatible with the character of the town. It does not, however, go as far as proposing Neighbourhood Development Orders, as aspects of development management are best left to the Borough Council

		experts.
NPPF 17	Seeks that neighbourhood planning plays a part in developing an empowering and succinct planning system.	The NDP is an empowering process for the community in Winchcombe, Greet and Sudeley and deals with economic development and housing that is referred to in this paragraph of the NPPF. The NDP reflects the 12 principles set out in the NPPF, as the process of plan making described in the Environmental report shows.
NPPF18 – 22	Seeks the encouragement and protection of sites for economic growth	The NDP protects employment sites and encourages modest intensification within these designated sites as well as jn creating growth in tourism and personal care businesses.
NPPF 23 - 27	Refer to town centres	The NDP sets out policies to protect and enhance the retail heart of Winchcombe, where small retail premises offer opportunities for new business start-ups, and where there is potential for more outlets for local produce.
NPPF 28	Refers to policies to support economic growth in rural areas	The NDP allocates sites which will support economic growth in the wider rural area.
NPPF29 – 40	Refers to supporting sustainable transport	The NDP encourages new development within walking and easy cycling distance of the town centre, to minimise journey lengths, improved routes for non-motorised journeys, and car pool opportunities in a dedicated housing development for older households.
NPPF 42 - 45	Refers to supporting high quality communications infrastructure	The NDP does not discourage any form of communications infrastructure.
NPPF47 – 55	Refers to the delivery of a wide choice of housing and in particular NPPF 50 refers to mixed communities which reflect local demand	The NDP seeks to deliver further new housing for future residents – identifying sites for housing for both older people and new, young households – with the goal of maintaining a mixed community concomitant with being a living, working town. The NDP is open to affordable housing development in areas of need away from the urban area.
NPPF 56 – 68	Refers to the requirement for good design and in particular NPPF 58 seeks that NDPs should set out how that quality is to be provided	The NDP seeks to respect the Conservation Area and listed buildings, includes design requirements and refers to the extant Winchcombe Town Design Statement. It discourages illuminated advertisements in the town centre conservation area.
NPPF 69 – 78	Refers to the promotion of healthy communities and in particular to the use of neighbourhood plans to designate open green space	The NDP encourages the creation of new routes for walking and cycling and in designating Local Green Space seeks to protect open green space for public enjoyment, as well as AONB land accessible through public footpaths and bridleways.
NPPF 79 – 92	Refers to the protection of Green Belt land	Not applicable

NPPF 86	This policy refers to the criteria for inclusion of a village within the Green Belt and the openness of the character of the village as part of the open character of the Green Belt.	Not applicable
NPPF 93 – 108	Refers to climate change and flooding	The NDP discourages development in locations prone to storm flooding and requires sustainable urban drainage systems to reduce the immediate impact of storm water.
NPPF 109 - 125	Refers to the conservation of the natural environment including biodiversity	All developments must take due account of national and international designations for habitats and landscape. The NDP does not alter this in any way. Landscape impact has been a major driver in preparing the NDP, not least because development of some non-AONB areas would have as much impact on the AONB as development on AONB sites.
NPPF 126 - 141	Refers to the conservation and enhancing of the historic environment.	The NDP aims to protect listed buildings, including through suitable reuse, and the designated Conservation Area and historic parkland at Sudeley Castle.
NPPF 142 – 149	Refers to safeguarding minerals	Not relevant to this NDP
NPPF 150 – 182	Refers to Plan making and specifically to local authority plan making as neighbourhood planning is considered in the next section.	Not applicable
NPPF 183	Confirms that Neighbourhood Planning provides powers to grant planning permission	The NDP does not do this.
NPPF184	Seeks that NDP do not promote less development than is set out in the Local Plan or undermine its strategic policies.	The NDP promotes a wider form of development than the extant Local Plan policies and does not undermine strategic policies.
NPPF 185	Sets out the relationship of NDPs with other policies	This is implicit in the NDP
NPPF186 - 219	Refers to decision taking, enforcement and implementation	These policies are not directly relevant the NDP other than the generality of the NDP forming part of the development framework

## Annex B: Winchcombe and Sudeley Neighbourhood Plan: General conformity with saved and emerging policies

Overall it is considered that the draft Winchcombe and Sudeley Neighbourhood Plan (WSNP) is in general conformity with the strategic policies of the development plan in force at the time of submission (i.e. the saved policies of the Tewkesbury Borough Local Plan to 2011 and the Gloucestershire Waste Core Strategy).

General conformity is taken to mean pointing in a ‘like direction’ to the development plan with a degree of flexibility<sup>2</sup>. It should be noted that a NP could still be in general conformity with the strategic development plan policies even if some policies conflict.

<b>General conformity with saved and emerging policies</b>			
<b>WSNP policy</b>	<b>Saved strategic policy</b>	<b>Emerging policy</b>	<b>General conformity</b>
1.1 Dev respecting distinctive character	TBLP saved policies: GNL2 design requirements for major development proposals; HEN2 the setting of conservation areas; LND2 special landscape areas, LND4 countryside, LND6 historic parks and gardens; LND7 landscaping; and NCN3, NCN5 and NCN6 for nature conservation, where these are in conformity with the NPPF.  NPPF:115	Emerging JCS policies: SD5 design; SD7 landscape and SD8 AONB; SD9 historic environment; SD10 biodiversity; and INF4 green infrastructure.  Emerging TBP policies: ENV1-6 relate to the environment/landscape; and HER1-6 to historic assets.	Policy 1.1 is in general conformity with the saved policies of the development plan.

<sup>2</sup> Persimmon v. Stevenage B.C. [2006] 1 WLR 334 para 26

	requires great weight to be given to AONB, para 116 sets out tests for major dev in AONB when a planning application is being considered.		
1.2 minimise loss of productive land	TBLP policy RCN10 Allotments; AGR2 and AGR3 agricultural dwellings; AGR4 diversification, AGR6 and AGR7 re-use and character of agricultural buildings;  AG1 was not 'saved'.	Emerging JCS policy SD15(vi) relates to agricultural land. Emerging JCS reasoned justification for policy INF4.  Emerging TBP policy HOU6 relates to Change of Use of Agricultural Land to Residential Curtilage; policy RCN4 Allotments	Policy 1.2 is in general conformity with the saved policies of the development plan.
1.3 Avoiding developing land at risk of flooding	TBLP saved policies: EVT5 and EVT9 flood and SUDs.  Adopted SPD on Flood and Water Management	Emerging JCS policy INF3 flood mgt and SUDs	Policy 1.3 is in general conformity with the saved policies of the development plan.
1.4 Sustainable Connections	TBLP saved policies: accessibility TPT1, TPT3, TPT5, TPT6, TPT9; HOU2 and HOU5 housing dev in existing residential areas	Emerging JCS policy INF1 and INF2 transport and access.  Emerging TBP policy TRAC1, TRAC2, TRAC3	Policy 1.4 is in general conformity with the saved policies of the development plan.
1.5 Important Open Space	TBLP saved policy LND5 (the NP policy is more akin to	Emerging TBP policy ENV3	As currently worded the policy is more akin to Important Open Space Policy LND5

	Important Open Space Policy LND5 than the Special Landscape policy LND2).		than saved policy LND2 to which its title has closer affinity.  The proposed policy goes beyond the provisions in LND5 by placing a blanket ban on development regardless of whether it 'adversely affects the character and appearance' of the land.
1.6 Local Green Spaces	TBLP has no policies relating to Local Green Space Designation.  NPPF: 76-78 covers LGS		The policy needs to reflect the same approach as for Green Belt (as required under NPPF:78). Evidence needs to be provided to support designation of LGS.
2.1 New commercial/light industrial dev	TBLP saved policies: EMP2, EMP3, EMP4 and EMP5.	Emerging JCS policy SD2 relates to employment issues.  Emerging TBP policies DES2 and EMP2-5 cover these type of issues.	Policy 2.1 is in general conformity with the saved policies of the development plan.
2.2 Postlip Paper Mill	TBLP saved policies GNL2 and EMP2 and EMP5	Emerging JCS policy SD2 Employment and SD5 Design and SD8 AONB.  Emerging TBP policy EMP2	Policy 2.2 is in general conformity with the saved policies of the development plan.
2.3 Retail development	TBLP saved policies RET3,4,5,6,8,9, and GNL2. HEN2 the setting of conservation areas.	Emerging JCS policy SD3 relates to retail issues.  Emerging TBP policies RET1-6 and HER1	Policy 2.7 is in general conformity with the saved policies of the development plan.
2.4 Protection of retail business premises	TBLP saved policy EMP5. Policy RET3 refers to retail in Winchcombe.	Emerging JCS policy SD3  Emerging TBP policies EMP2-5	Policy 2.3 is in general conformity with the saved policies of the development plan.

2.5 Tourist accommodation	TBLP saved policies TOR1, 2, 4, 5, 6, 7, GNL2 Design for major development proposals. HEN2 the setting of conservation areas.	Emerging JCS policy JCS policy SD2 (supporting text) and SD3 relate to tourist issues.  Emerging TBP policies TOR1 and 2 and HER1.	Policy 2.6 is in general conformity with the saved policies of the development plan.
2.6 Home working	TBLP saved policies EMP2 and EMP4	Emerging TBP policy EMP2	Policy 2.5 is in general conformity with the saved policies of the development plan.
2.7 New stabling, animal feed shelters or agricultural buildings	TBLP saved policy RCN6.  Landscape policies (where applicable) LND2, LND4, LND6	Emerging JCS policies SD7 and SD8 landscape and AONB.  Emerging TBP policy ENV1 Special Landscape Areas	Policy 2.4 is in general conformity with the saved policies of the development plan.
2.8 Local producers	TBLP saved policies RET3 and RET9. And HEN2 the setting of conservation areas.	Emerging JCS policy SD3  Emerging TBLP policy RET2 and RET6 and HER1	Policy 2.8 is in general conformity with the saved policies of the development plan.
2.9 Sudeley Castle	TBLP saved policies HEN17, LND6, TOR1, TPT1 and HEN2.	Emerging JCS policy SD9, INF1 and INF2  Emerging TBP policy TOR1, TOR2 and HER1 and HER6	Policy 2.9 is in general conformity with the saved policies of the development plan.
2.10 Winchcombe Pottery	TBLP saved policies GNL2 and EMP2, EMP5 and TOR1	Emerging JCS policy SD2  Emerging TBP policy EMP2 and TOR1	Policy 2.10 is in general conformity with the saved policies of the development plan.
2.11 Old Town Hall	TBLP saved policies GNL2 and EMP2, EMP5 and TOR1 and HEN2	Emerging JCS policy SD2, SD9  Emerging TBP policy EMP2 and TOR1 and HER1-4	Policy 2.11 is in general conformity with the saved policies of the development plan.
2.12 Glos Warks Railway	TBLP saved policies TPT11, TOR1	Emerging TBLP policy TRAC11	Policy 2.12 is in general conformity with the saved policies of the development plan.
3.1 Incremental	TBLP saved	Emerging JCS policy	There are no up to

growth	<p>policies HOU2-9, HOU11, HOU13-14. It is noted that some of these saved policies have been considered out of date by Inspectors at appeals due to a lack of a borough-wide 5 year housing land supply.</p> <p>Other TBLP saved policies LND2, LND4, LND6, NCN3, NCN5, NCN6, RCN1, EVT9, TPT1, TPT3</p>	<p>SP2, SD5, SD7-13, INF1-4</p> <p>Emerging TBP policies HOU1-4, TRAC2, ENV1, ENV4-6</p>	<p>date strategic housing policies in which to be in general conformity with.</p> <p>Policy 3.1 appears to generally conform with the other policies in the development plan but as the housing needs OAN for the wider area is currently being considered at JCS examination and there being no up to date figures to use the approach set out in the introduction to section 3 based on the JCS criteria and OAN appears reasonable.</p> <p>It is noted that there is no limit set on the number of 5 house developments that could be approved.</p>
3.2 Infill devt	TBLP saved policies HOU2-8	<p>Emerging JCS policy SD11</p> <p>Emerging TBP policy HOU2</p>	Policy 3.2 is in general conformity with the saved policies of the development plan.
3.3 Redevelopment of poor quality housing	TBLP saved policies HOU7, HOU9, HOU13, HOU14	<p>Emerging JCS policy SD11-13</p> <p>Emerging TBP policy HOU4</p>	Policy 3.3 is in general conformity with the saved policies of the development plan.
3.4 Meeting local needs for new homes for those on modest incomes	<p>TBLP saved policies HOU13 and HOU14. However HOU13 relates to the plan period and could therefore be considered out of date.</p> <p>TBC Affordable Housing SPG (2006).</p>	Emerging JCS policy SD13 (but this has been subject to debate during JCS examination).	The policy generally conforms with the saved policies in the TBLP but noting that changes to affordable housing are currently being proposed by Ministers which may further change the situation. The JCS Inspector is also currently considering this issue in respect of the strategic overarching policy for

			the borough.
3.5 Retirement homes	TBLP saved policies HOU11 and GNL2	Emerging JCS policy SD12 and SD8	Policy 3.5 is in general conformity with the saved policies of the development plan.
3.6 Support for services – S.106/CIL	TBLP saved policies GNL11, GNL15, RCN1-4	Emerging JCS policies INF4 and INF8 Emerging TBP policy IRC1 and TRAC1-3, RCN1-2	Policy 3.6 is in general conformity with the saved policies of the development plan.
3.7 Bungalows	TBLP saved policies HOU2-3, HOU11	Emerging JCS policy SD12	Policy 3.7 is in general conformity with the saved policies of the development plan.
4.1 Protecting community facilities	TBLP saved policy GNL15	Emerging JCS policy INF5 Emerging TBP policy IRC1	Policy 4.1 is in general conformity with the saved policies of the development plan.
4.2 Indoor sports and youth facilities	TBLP saved policies RCN1-4, GNL15	Emerging JCS policy INF5 Emerging TBP policies IRC1, RCN1-2	Policy 4.2 is in general conformity with the saved policies of the development plan.
4.3 Facilities for older residents	TBLP saved policies RCN1-4, GNL15	Emerging JCS policy INF5 Emerging TBP policies IRC1, RCN1-2	Policy 4.3 is in general conformity with the saved policies of the development plan.
4.4 Facilities for younger residents	TBLP saved policies RCN1-4, GNL15	Emerging JCS policy INF5 Emerging TBP policies IRC1, RCN1-2	Policy 4.4 is in general conformity with the saved policies of the development plan.
4.5 walking and cycling	TBLP saved policies TPT1, TPT3, TPT5	Emerging JCS policies INF1-2 and SD5 Emerging TBP policies TRAC1 and TRAC2	Policy 4.5 is in general conformity with the saved policies of the development plan.
4.6 provision of new allotments			
5.1 Design of new development	TBLP saved policy GNL2 (major dev)	Emerging JCS policy SD4 and SD5 Emerging TBP policy HER4	Policy 5.1 is in general conformity with the saved policies of the development plan.
5.2 Off street parking	TBLP policy TPT12 was not saved. Saved policy EVT9 relates to	Emerging JCS policy SD5 does not specify parking standards.	Policy 5.2 is in general conformity with the saved policies of the development plan.

	drainage		
5.3 Winchcombe Conservation Area	TBLP saved policies HEN2, HEN6, HEN7, HEN17	Emerging JCS policies SD5 and SD9 Emerging TBP policies HER1-4	Policy 5.3 is in general conformity with the saved policies of the development plan.
5.4 Shop fronts and signs	TBLP saved policies HEN2, HEN6, HEN7, HEN17	Emerging JCS policies SD5, SD9  Emerging TBP policy DES1, HER1-4	Policy 5.4 is in general conformity with the saved policies of the development plan.
5.5 Extensions to buildings	TBLP saved policies HOU6, HOU8, HOU9, EMP2-5	Emerging JCS policy SD5  Emerging TBP policies HOU5, EMP2	Policy 5.5 is in general conformity with the saved policies of the development plan.
5.6 Gardens	There are no TBLP saved policies relating to domestic gardens	Emerging JCS policy SD5	There are no adopted policies relating to provision of domestic gardens.
5.7 Safety	TBLP saved policies TPT1, TPT3, TPT5.  Policy GNL7 was not saved.	Emerging JCS policies INF1-2 and SD5  Emerging TBP policies TRAC1 and TRAC2	Policy 5.7 is in general conformity with the saved policies of the development plan.
5.8 Resource efficiency	TBLP saved policy GNL8, EVT1	Emerging JCS policy SD1, SD4, SD5, SD8	Policy 5.8 is in general conformity with the saved policies of the development plan.
5.9 Flood reduction	TBLP saved policy EVT9  TBC Flood and Water Management SPD (2014)	Emerging JCS policy INF3	Policy 5.9 is in general conformity with the saved policies of the development plan.
5.10 Waste reduction	There is no TBLP saved policy relating to this issue.  Gloucester Waste Core Strategy Policy WCS1	Emerging JCS policy SD4 (reasoned justification)	Policy 5.10 is in general conformity with the saved policies of the development plan (NB the Waste Core Strategy forms part of the development plan and is prepared by Gloucestershire County Council).

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