

Waste Core Strategy Emerging Preferred Options

Consultation Response Summary

May 2010

Introduction

The Council is preparing a "Waste Core Strategy: a plan for how to manage all the waste produced in Worcestershire up to 2027. In November 2009, the Council consulted on the "Emerging Preferred Options Consultation". This report sets out in detail the issues we need to address, how we intend to do so and the alternatives we have considered. The consultation period ran from 16th November 2009 to 4th February 2010.

Over 1,300 organisations and individuals were contacted directly and documents and questionnaire were made available on the council's website and at hubs and libraries. To publicise the consultation articles were placed in the free Word on Worcestershire resident's magazine and the Worcestershire Partnership Newsletter, media releases were issued and public notices were placed in free newspapers. Libraries, hubs and waste operators were also sent posters with a request that they display these on their premises.

We received 120 responses overall. A summary of main issues raised is provided here. Full details of the comments received along with an initial Officer's response are set out in *Consultation Response Document* available on our website www.worcestershire.gov.uk/wcs or by request from Nick Dean 01905 76637 or wcs@worcestershire.gov.uk.

Summary of responses received

Numerous responses related to the data used and questioned the accuracy of figures and projections. It was pointed out that data is rarely up to date and is often flawed.

This problem is recognised at all levels, including government. Defra is currently trying to improve the accuracy of data. We will use the best information available. We acknowledge the weaknesses in available data on C&I waste and set out the limitations in details in the *Waste Arisings Background Document: Summary of Waste Arisings and Estimates of Waste Growth to 2027*. We will however endeavour to develop the WCS based on the best available data and will continually keep our evidence base under review.

Projections were also not felt to reflect the current economic situation, with it being anticipated that lower incomes and greater economic pressures on business will result in waste reductions.

The strategy will apply until at least 2027 and must therefore take into account long term as well as immediate economic pressures. The WCS will be regularly monitored and reviewed. In line with regional and national policy, we are consciously pursuing ambitious targets as a worst-case scenario. We do not think that market forces will support an over-provision of facilities.

In general consultees expressed the view that Climate Change was an important consideration in the plan and that in some cases this needed to be strengthened to remove any contradictions

We agreed with this statement and will consider it when developing the Waste Core Strategy.

Alternative forms of transport were not felt to be fully considered in the Emerging Preferred Options Paper.

The Council is preparing background papers on *Inland Waterways* and *Waste Freight by Rail*. The WCS will be updated to include a more comprehensive consideration of these issues.

Anaerobic Digestion was a popular treatment technology, and recycling was heavily supported.

Whilst the Waste Core Strategy will promote movement of waste up the waste hierarchy (Reduce-Reuse-Recycle and only to landfill as a last resort), it will be as flexible as possible in order to cope with technological change and does not favour any specific technology type.

The policies will be strengthened to make the reference to the waste hierarchy more explicit and embed it as a guiding principle for the Waste Core Strategy.

There was general agreement with the Spatial Hierarchy however it was suggested that alterations should be made to the positions of Redditch, Tenbury and Bewdley due to their functions in the sub-region. In addition it was suggested that the approach should be flexible enough to deal with waste arisings elsewhere or from specialist facilities.

The Strategy will be revised accordingly, to reflect the hierarchy of settlements in the RSS and the pattern of arisings and opportunities for waste related development in the county.

Cross boundary movements of waste were considered to undermine the strategy and in particular objectives WO5 "To make communities in Worcestershire take responsibility for their own waste" and WO6 "To reduce the transport of waste by road where possible". There was particular concern regarding the joint management of waste from Herefordshire and Worcestershire. Although some support was voiced for the way in which cross-boundary movements were considered, several comments suggested that this consideration should be expanded.

We agree that waste should be managed as close as possible to the source of their arisings. We do, however, have to recognise that there are economies of scale for some facilities.

The Waste Core Strategy will recognise the need for cross-boundary co-operation, however it is inevitable that economies of scale mean that some wastes will be imported and exported into and out of the county. The strategy will seek to minimise this and will be based upon achieving equivalent self-sufficiency in waste management capacity.

The management of Municipal Waste is undertaken in partnership between Worcestershire County Council, Herefordshire Council and all District Councils in Worcestershire. Their approach is set out in the Joint Municipal Waste Management Strategy. The reviewed Joint Municipal Waste Management Strategy does not specify where the major waste treatment facility/ies should be located. It does however require that some facilities for the treatment of MSW are/will be located in Herefordshire e.g. composting and bulking plant.

The WCS will be updated to make the consideration of cross boundary movements more explicit, demonstrating these graphically. The spatial implications on the joint waste management contract with Herefordshire will be considered in more detail.

There was some confusion between the Waste Core Strategy and Joint Municipal Waste Management Strategy.

The council has two distinct responsibilities, as a waste disposal authority (relating to the Joint Municipal Waste Management Strategy) and as a waste planning authority (relating to

the Waste Core Strategy), covered by different statutory regulations and policy requirements. The two elements are conducted quite separately.

The reviewed Joint Municipal Waste Management Strategy deals with how municipal waste should be managed. The Waste Core Strategy must set the policy framework by which all waste management facility developments must be assessed, including those brought forward from the reviewed Joint Municipal Waste Management Strategy. The Waste Core Strategy will replace the existing policy framework (Structure Plan and relevant district Local Plan policies) but these will continue to be used to assess applications until the Waste Core Strategy is adopted.

Efforts were made to explain this distinction in all consultation documents and on our website. We will continue to make the distinction as clear as possible in the future.

Many responses received made reference to a proposed incinerator at Hartlebury. In relation to this the following concerns were raised:

- 1) The application may be determined before the Waste Core Strategy is adopted and as such the community would not have to opportunity to have a say;**
- 2) Incineration may have impacts on pollution and health in the area;**
- 3) Anaerobic digestion would be preferable to incineration but has not been given adequate consideration;**

The Waste Core Strategy is not technology specific. It does not include any commitment to incineration nor does it identify sites at this stage. At the time of the consultation a proposal for an energy from waste plant at Hartlebury was at a pre-application stage. This proposal was being developed by Mercia Waste Management. The Council has a contract with Mercia to deal with Municipal Waste and this is likely to be the cause of the confusion. However the council has two distinct responsibilities, as a waste disposal authority and as a waste planning authority, covered by different statutory regulations and policy requirements. The two elements are conducted quite separately.

- 1) Any application for planning permission will be determined on its merits, judged on the basis of the Development Plan. When completed the Waste Core Strategy will form part of the Local Development Framework. This will be used alongside District and Borough Core Strategies (which will replace the old 'local plan' and 'structure plan' policies) to provide the planning policies against which applications for waste management will be judged. However until the Waste Core Strategy is adopted the existing policy framework will be used to assess applications, including national and regional policy, saved policies in the Structure Plan and the relevant Local Plan. A previous application by Mercia Waste for an incinerator (at Kidderminster) was refused planning permission by the council. Other proposals which do not comply with the development plan will similarly be refused.

All applications will be advertised and consulted upon in accordance with the council's Statement of Community Involvement, which is intended to enable local people and statutory and non-statutory consultees to express their views.

- 2) The Environment Agency is responsible for advising the council on the pollution implications of waste management proposals and will be consulted on both the emerging Waste Core Strategy and any Planning Applications. Defra's advice is that there is no credible evidence of adverse health outcomes for those living near incinerators (Waste Strategy 2007, p77).

All applications with potentially significant environmental impacts will be required to include an Environmental Impact Assessment. The Environment Agency and, if appropriate, the Health and Safety Executive, Health Protection Agency and Primary Care Trust will be consulted on any such application.

- 3) The advantages and limitations of Anaerobic Digestion and thermal treatment have been considered in the background paper *Recovering Energy from Waste*, available on our website www.worcestershire.gov.uk/wcs.

Comments were made by some that the consultation was not detailed enough, and by others that the consultation was too complex.

The issues are necessarily complex, but due to the size of the document some information was not included. Instead it was available alongside it in the background papers, particularly the *Waste Arisings* paper, available on our website.

In the preparing the submission document, efforts will be made to make sure the content is as clear and as readable as possible, without over simplifying what are often complex issues.

Other issues were mentioned that are outside of the remit of the WCS, including improving the collection of commercial and industrial waste and initiatives to reduce waste arisings from these sources.

We have informed the Council's waste management and economic staff about these concerns and they will consider them accordingly.