

Late comments Emerging Preferred Options:

Please note this provides a summary of the comments. Full details can be viewed on request. File ref SP8010/8/04 Responses to Emerging Preferred Options F2.

Malvern Hills AONB Unit

8th February 2010

Waste facilities should be sited close to centres of population to reduce distances needed to transport waste. Sites in rural areas such as the Malvern Hills AONB should be avoided unless absolutely necessary.

Hierarchy of Broad Areas: The AONB could be added to the text of the final bullet point on page 30 to clarify that it comes within the 'limited rural development' category.

Q4: Size – Large facilities could collect a range of waste from a larger area and could help to avoid the need for facilities in sensitive areas such as the AONB. Small facilities in the AONB should be the exception and related to a specific local waste stream.

Q5: Yes to all

Q6: Yes – WCS 1, 2, 3, 4, 6, 7, 8, 9, 10, 11
Don't know – WCS 5

We would welcome the inclusion of specific references to the AONB under policies WCS3 and WCS11. WCS7 could include a reference to the mandatory waste management requirements under the Code for Sustainable Homes. We are keen to promote the Use of the Code in the AONB.

The document clearly needs to recognise the importance of the landscape of the AONB and seek to site major facilities outside the boundary. Smaller sites within the AONB should only be created if absolutely necessary and should be accompanied by a full justification of need and a comprehensive landscaping scheme.

Views towards and from the Malvern Hills are an important consideration for the AONB and its setting. Potential sites that may interrupt views towards the Hills or that are clearly visible from the ridge of the Hills should be given special scrutiny to identify impacts and incorporate appropriate mitigation measures.

WCC Response: Agreed in principle, changes to be made to clarify importance and sensitivity of AONB issues and need to define and limit what and how development would be acceptable in AONB. Policy will emphasise landscape character rather than protection of views but there will be no deviation from national policy to protect AONBs.

Bewdley Town Council

10th February 2010

The group was concerned at the obvious cost involved in the preparation of this consultation document

It is impossible to predict movement of waste that has to be managed as far ahead as 2027. More recycling and re-use of waste should take place. The

amount of waste capacity needed is really unknown. Although we do appreciate the fact that a certain amount of waste needs to be catered for, the target capacity seems to be very high.

WCC Response: The council has a statutory duty to produce the Waste Core Strategy. The costs to date have been limited to the use of consultants to produce specialist assessments and to publication costs. These are very modest in comparison to the likely benefits to be gained. We estimate that landfill cost the local economy £50 million in 2007. The strategy aims to reduce the amount of material so treated to be at least halved, at a time when landfill costs are predicted to continue to increase. The benefits locally are therefore likely to be considerable.

Issues relating to projections are discussed in the "Consultation Response Document".

More Energy could be produced through improved disposal of clinical waste. New thermal treatment facilities are definitely needed to provide energy not to waste it. If these facilities were located close to houses, residents should be offered incentives to use this energy created to lower their heating bills.

WCC Response: The Waste Core Strategy will be developed with this in mind.

We definitely need more household waste sites. Composting sites essential

WCC Response: Noted. The Waste Core Strategy will be developed with this in mind.

People should be educated to recycle more efficiently. Imperative we improve composting tonnages. Waste from construction companies could be used to provide hard core. As much waste as possible should be diverted away from landfill sites. More incentives needed to recycle. Preferred option would be:

Reducing initial waste by recycling and incineration
Again more incentive to householders.

WCC Response: Noted and Agreed.

It could be 20-30 years before landfill sites have settled. Reopening them before this time could prove hazardous.

WCC Response: There are no proposals to re open landfill sites.

Transportation costs need to be looked into £30M for this county alone is far too high. River Severn is not navigable to Bewdley.

WCC Response: This will be investigated further.

Do not agree on the amount of land needed for new waste management. Solution being tackled from the wrong end. Again hospitals/schools/flats could all burn their own waste in their own boilers.

WCC Response: The WCS will provide a framework for assessing such proposals.

Overall a document that needed more purpose – making something voluntary that should be compulsory. Everyone needs to be far more pro-active – "If you don't recycle – face a fine"

WCC Response: Once adopted all relevant planning applications will be assessed against the policies. The other issues mentioned are outside of the remit of the WCS.

Mr P Green (395)

11th February 2010

I tried to answer these questions but the data was too detailed and I felt it did not justify where the assumptions for reduction were taken from.

WCC Response: These issues are dealt with in the "Consultation Response Document".

N Winter

11th February 2010

I am unable to open the relevant documents on the County website – However I am in broad agreement with what I do know about the proposals. However, I am concerned that it appears that Worcestershire will still be responsible for processing Herefordshire's waste. Surely the resultant thousands of yearly HGV movements is not helping the environment. It is time that Herefordshire took responsibility for recycling their own waste.

WCC Response: The issues raised have been addressed in the "Consultation Response Document".

Natural England

11th February 2010

Natural England supports the emerging Preferred Options which, overall, moves waste management towards increased sustainability. In some instance the questions posed in the consultation are beyond our technical capabilities or our remit.

We believe there is scope to strengthen ties between the emerging WCS and the emerging LDFs. The management of household waste at source could be a powerful waste reduction measure, but needs wholesale application if it is to achieve its potential. Features such as household waste disposal units should be fitted as a matter of course, along with the provision of community composting facilities, ideally professionally managed and utilising carbon-rich material which comes from green buns supplied. Such measures are unlikely to be delivered unless they are set out in policies in the emerging LDF, and we strongly urge the Council WCS team to undertake the advocacy needed to achieve this.

WCC Response: Noted, opportunities are currently being explored.

Spatial Portrait: Natural England welcomes the spatial portrait as a valuable way of setting the scene. The layout of the portrait is somewhat confusing, as the section on waste and several maps divide the sections on the economy from the following sections on transport, agriculture, landscape etc. It would be easier read

if the section on waste, with maps, was positioned last, after painting a picture of the county. Regarding the section on transport, the ease of long distance movements into and across the county is highlighted, quoting the LTP 2006-11. We feel there would be merit in pointing out that such trips are not necessarily desirable, given the climate change context and existing congestion and pollution issues. The section on sustainability provides a very useful starting point for resource management, and receives our full support.

WCC Response: Change to be made. The Spatial Portrait will be re-drafted to improve clarity.

Vision and objectives: Natural England fully supports the vision and objectives set in emerging WCS. We particularly welcome the last point, the long-term objective for Worcestershire to be a zero-waste county. However, we feel the staged progress required to achieve this objective is currently lacking, and question whether the strategy takes a positive enough stance on progressing towards this objective. We recognise that the emerging WCS is to some extent constrained by the requirement for conformity with regional and national policy and by the fact that government guidance on how to address climate change is yet to emerge. However, as a beacon authority on climate change we feel Worcestershire County Council should be pushing the boundaries. The interplay between national and local government is a two-way process, and we feel there is scope to promote certain directions of enquiry / research / proposals within the WCS whilst retaining the flexible approach.

WCC Response: Noted. We intend to monitor all aspects of the Strategy, including the appropriateness of the Vision and Objectives and will revise the plan as necessary. At present however we feel that zero waste can only be an aspiration.

Natural England supports the proposed Hierarchy of Broad Areas for allocating capacity taken, as it is in conformity with the RSS.

WCC Response: Support noted.

Draft Policy Direction WSC1: Natural England fully supports this policy direction. We particularly welcome the consideration of the government's Climate Change Programme and energy policies, with reference to DEFRA's Performance Indicators on this subject. Regarding the focus on flexibility, whilst we support this approach we would welcome greater leadership from this emerging WCS, getting behind the stated commitment to develop policies which drive change rather than relying on market factors and guidance/targets from central government.

WCC Response: Noted, the Council has very limited ability to drive change in the private sector; at present therefore we have to rely on market mechanisms and the private sector to address most waste streams. The emphasis on flexibility is to enable innovation within the waste industry. These matters are largely out of control.

Draft Policy Direction WSC2: No overriding preference, however, as option A (size) seems the most straightforward and flexible option and would ensure that

larger developments were appropriate, had supporting infrastructure etc, we give this option our support.

Draft Policy Direction WCS3: We support the concept of a Key Diagram to influence/inform the location of different kinds of waste management. We welcome the inclusion of the AONB on this diagram. Proposals which do not conflict with or detract from the purposes for which the AONB was designated should be treated as theoretically acceptable. We recommend that this diagram indicates the flood plain.

WCC Response: Noted and agreed.

Draft Policy Direction WCS5: Natural England supports the targeting approach to reducing waste to landfill, which gives a clear idea of how the overarching aims will be achieved.

WCC Response: Support noted.

Draft Policy Direction WCS7: We welcome and support this policy direction. We urge greater integration of the emerging LDF Core Strategies with the WCS in order to ensure waste disposal units, community recycling and composting facilities etc are delivered as standard in all new builds.

WCC Response: See above.

Draft Policy Direction WCS8: This policy would help to ensure sufficient types of technology or facilities will be permitted to reflect and support the waste management needs of the economy of Worcestershire. We question why only the economy is considered here, and whether relying solely on market forces will deliver the WCS's vision.

WCC Response: Noted, the Council has very limited ability to drive change in the private sector; at present therefore we have to rely on market mechanisms and the private sector to address most waste streams. The emphasis on flexibility is to enable innovation within the waste industry. These matters are largely out of control.

Draft Policy Direction WCS9: We believe the Council are adopting a pragmatic approach to this situation, although we would welcome increased leadership from this Beacon Authority.

Draft Policy Direction WCS11: We support this stance, and recommend that the Green Infrastructure Strategies which are currently being produced by the County Council and District Council's be added to the list of features upon which proposals must ensure no unacceptable impacts.

WCC Response: Agreed. Green Infrastructure will be considered

We would welcome the inclusion of a policy on restoration and after-care, particularly around the restoration of landfill sites for biodiversity/wider green infrastructure use. We would support a policy on the control of landscaping and

noise mounds. Policies on PD rights and local recyclable collection points would be useful in giving a county-wide clarity.

WCC Response: Support noted.

Monitoring Indicators: The Indicator on Habitats is very limited in scope and has no real value. We suggest discussing a more appropriate indicator with your Planning and Environment department. Natural England and Worcestershire Wildlife Trust are in the process of considering opportunities for a standardised biodiversity indicator which we would ask all strategies to include and all Annual Monitoring Reports to report on. We would welcome any thoughts on this matter.

WCC Response: Noted, we intend to explore these matters with Natural England.

Highways Agency 12th February 2010

The HA welcomes the opportunity to comment at this stage of the Waste Core Strategy and fully embraces the principle of continuous consultation as set out in PPS12. We look forward to continuing to work with you to ensure that the level of growth required by the RSS can be accommodated sustainably and without detriment to the Strategic Road Network.

Agree with the proposed Hierarchy of Broad Areas for allocating capacity. It would be useful to develop Preferred Options along the lines of draft policies WCS 1, 2, 3 and 4.

WCC Response: Support noted.

Dodford with Grafton Parish Council 15th February 2010

WO6 and WCS5: It is difficult to find fault or criticise these draft proposals as they seem to cover all the relevant aspects. However, the report forecasts household waste reduction. How will this be achieved? How can households be persuaded to participate?

WCC Response: this is outside the remit of the WCS and is addressed through the JMWMS.

WCS3: A policy is required to protect local communities from traffic noise, road damage and debris. Contractors and sites should be regularly monitored to ensure that agreed maintenance provisions are maintained.

WCC Response: Agreed. This will be considered in more detail in the development of the WCS.

West Midlands Friends of the Earth 15th February 2010

We would urge you to rename this as a "Resource Use Strategy". The term waste implies an out of sight out of mind attitude to the precious resources which are held in our so called waste stream.

WCC Response: Noted but not agreed. GOWM's advice is that the term "Waste core Strategy" should be used because it is widely understood and referred to in national policy, the use of other terms could confuse or mislead.

Energy from waste draft policy WCS10: We object to this policy and see no need for any mass burn within the two counties.

While we welcome much of what is in WCS1 this should not include a mass burn incinerator capable of burning and thus requiring 200,000 tonnes of feedstock every year for a long time hence. This is not sustainable both economically and environmentally. We urge you to remove the term energy from waste from this strategy and deliver comprehensive waste reduction policies linked in with far more progressive resource use technologies which will deliver in terms of our economy, our society and our environment.

WCC Response: The issues raised have been addressed in the "Consultation Response Document".

(Several comments were raised regarding the proposed incinerator at Hartlebury but have not been included here as the WCS does not propose any specific facilities – these issues have been outline in the "Consultation Response Document")

Halcrow Group Ltd

17th February 2010

It is clear that the report is a comprehensive piece of work which is underpinned by robust evidence. On the whole the proposals are rational and can be justified using the extensive background work commissioned to underpin them. We don't propose to challenge any of the options or proposals.

WCC Response: Support noted.

Agree with all arisings and projections but comment that C&I, C&D and hazardous waste figures are kept under review in light of the findings of Defras C&I survey planned for 2010 and emerging data from WRAP relating to C&D waste.

Would support the move to provide additional capacity for biodegradable waste and would encourage maximum integration between MSW and C&I waste capacity. It would be helpful to indicate whether the proposals for C&D waste capacity have taken account of the Waste Framework Directive target to re-use, recycle and recover 70% of C&D waste.

WCC Response: The issues raised have been addressed in the "Consultation Response Document".

Given the diversity of different waste treatment and disposal facilities available, we would ask whether the assumed average of 1HA to process about 50,000t of waste per year is not too simplistic.

WCC Response: These assumptions are currently being reviewed.

We would support locating new facilities close to projected new and existing C&I waste producers and would suggest that these decisions take account of the results of the Defra C&I waste survey to be undertaken during 2010.

WCC Response: Agreed.

We would agree with the overall policy direction with regards to sustainable development and the proximity principle. We would also support a requirement for facilities over 1000 sq m gain 10% of energy supply from alternative or renewable sources. In addition we offer the following comments:

- There should be the greatest possible integration between the development of capacity for MSW and C&I waste as we believe that in the long term this will provide greater degrees of efficiency with regard to investment in new infrastructure. This may drive the development of the Strategy towards larger-scale more strategic facilities (also applies to WCS8).
- Agreed with WCS3 & 4 to provide greater certainty over allocation of sites
- WCS7 is a key requirement in informing the ongoing development and revision of the strategy.
- Support WCS11.

WCC Response: Support noted. Integration of MSW and C&I is a commercial decision which is not within the remit of the WCS. This is discussed in the "Consultation Response Document".

Mr Levy

19th March 2010

Comments make reference to Global warming, dwindling oil supplies and over population.

There is a call for stronger incentives for kerbside recycling, including charging for the collection of normal rubbish but not recycled items or food scraps. Wasteful practices of small traders should also be discouraged and local government should request legislation from Central Government to help them.

Whether we look at the problems of waste disposal, traffic congestion or the taking of Greenfield sites for new housing we have one common cause – over population - suggests tax reforms and one child per family policy as a solution.

Manufacturers should be forced to bring back returnable drinks containers, other measures would be biodegradable sweet wrappers and stopping the Post Office delivering leaflets with the daily post.

The Government scrappage scheme for cars seems only to please car manufacturers.

WCC Response: The issues raised are outside the remit of the Waste Core Strategy. The Joint Municipal Waste Management Strategy seeks to increase recycling and to reduce household waste; one initiative already in use is the 'junk the jilt mail' campaign.

Energy from waste should form no part of the Waste Core Strategy:

- Energy produced would be minimal – Option A EFW claimed to provide electricity for 20,000 homes so by burning waste from 775,000 people we would get enough electricity to supply 5.9% of them. 94% is still going to be produced by conventional means. It would be better to spend money on wind generators.
- It cannot be proven that there is no health risk – Dioxins are known carcinogens but also give off a whole cocktail of other contaminants.
- Considerable amount of the greenhouse gas carbon dioxide are produced.
- Energy costs in transport are considerable and with an expected large rise in oil price this would become not viable.
- 250,000 tones is a very poor target for recycling.

Why then is EFW being proposed? We need decentralized waste processing facilities to minimise transport costs and these should be spread throughout the region. An autoclave would be a better option than EFW.

WCC Response: there appears to be some confusion with the JMWMS. A response to the issues raised here has been given in the "Emerging Preferred Options Consultation Response Document"