

**WORCESTERSHIRE COUNTY
COUNCIL
LOCAL DEVELOPMENT
FRAMEWORK**

**WASTE CORE STRATEGY
DEVELOPMENT PLAN DOCUMENT**

INDEPENDENT EXAMINATION

**EXAMINATION HEARINGS
PROGRAMME & INSPECTOR'S
ISSUES AND QUESTIONS**

INDEPENDENT EXAMINATION

WORCESTERSHIRE COUNTY COUNCIL LOCAL DEVELOPMENT FRAMEWORK

WASTE CORE STRATEGY DEVELOPMENT PLAN DOCUMENT

Venue: The hearing sessions will be held in the Kidderminster Room of Worcestershire County Council, County Hall, Spetchley Road, Worcestershire, WR5 2NP. Sessions will commence on Tuesday 13th March 2012 at 10.00am and are anticipated to last for approximately a week.

Council: Worcestershire County Council will be participating in all hearing sessions.

Statement deadlines:

All Statements, for the Hearing Sessions should be sent to the Programme Officer by **midday on Friday 17th February 2012**. This deadline relates to the receipt of the both **paper and electronic copies**.

Statements:

The Inspector requests written responses from the Council to all the matters raised. The Council should use the agenda's for each session as a template and provide their responses following each question posed.

Participants should only answer the questions to which your name has been linked in the Issues and Questions for Discussion.

The examination starts from the assumption that the Council has submitted what it considers to be a sound Plan. The hearings will therefore be concerned only with considerations relating to the soundness or otherwise of the document, and all submissions should address that issue.

The Guidance Notes provided set out the requirements for the presentation of all Statements. Its provisions should be thoroughly read and implemented as otherwise Statements could be returned. Please note the 3,000 word limit.

In the Statements from respondents it would be very helpful for the Inspector to have a brief concluding section stating:

What part of the CS is unsound.
Which soundness criterion it fails.
Why it fails (point to the key parts of your original representations).
How the CS can be made sound.
The precise change and/or wording that you are seeking.

The Inspector will give equal weight to views put orally or in writing.

If you have any queries – please contact the Programme Officer, Ian Kemp, on 07723 009166 or via idkemp@sky.com

The Examination Programme is regularly updated. Please ensure you check the latest position if you wish to attend a particular hearing by contacting the Programme Officer or viewing it on the website at

<http://www.worcestershire.gov.uk/wcs-examination>

HEARINGS

Please remind yourself of the Inspector's guidance concerning the format of hearings at this Examination, contained in the Guidance Note.

WEEK 1	
Tuesday 13 th March 2012 Day 1 10.00am	Introductory Session All Welcome PROCEDURAL AND CONFORMITY MATTERS Worcestershire County Council; Ms K Dowty INTRODUCTION AND MISCELLANEOUS MATTERS Worcestershire County Council; Ms K Dowty; Mr A Jones;
2.00pm	ENSURING SUSTAINABLE WASTE MANAGEMENT DEVELOPMENT Worcestershire County Council; Ms K Dowty
Wednesday 14 th March 2012 10.00am	LANDFILL AND DISPOSAL Worcestershire County Council SPATIAL PORTRAIT, VISION AND OBJECTIVES Worcestershire County Council
2.00pm	RE-USE, RECYCLING AND "OTHER RECOVERY" Worcestershire County Council; Mercia Waste Management
Thursday 15 th March 2012 10.00am	ENERGY FROM WASTE PROPOSAL, HARTLEBURY TRADING ESTATE Worcestershire County Council; Mr P Luff MP; Mr A Jones; Mercia Waste Management; Ms K Dowty LOCATION OF NEW WASTE MANAGEMENT DEVELOPMENT Worcestershire County Council; Mr A Jones; Mercia Waste Management
2.00pm	LOCATION OF NEW WASTE MANAGEMENT DEVELOPMENT (Continued) Worcestershire County Council; Mr A Jones; Mercia Waste Management
Friday 16 th March 2012 10.00am	IMPLEMENTATION AND MONITORING Worcestershire County Council; Ms K Dowty PROPOSED MODIFICATIONS AND INSPECTOR'S CLOSING REMARKS Worcestershire County Council; All Welcome

INSPECTOR'S ISSUES AND QUESTIONS FOR DISCUSSION

Tuesday 13th March 2012 10.00am

Agenda for Introductory Session

1. Introductions
2. Programme Officer
3. Document Being Examined
4. Hearing Programme and Invited Participants
5. Conduct of Hearings
6. Scope of Discussion
7. Inspector's Remarks at end of Hearings
8. Recommendation Options
9. Main Modifications
10. Other (minor) Modifications
11. Advertising of Modifications
12. Any other procedural matters

Invited participants:

All Welcome

PROCEDURAL AND CONFORMITY MATTERS

Key Issue:

Whether the Core Strategy has been prepared in accordance with the relevant legal and procedural requirements

1. Has the Core Strategy been prepared in accordance with the Planning and Compulsory Purchase Act 2004 (as amended)?
2. Has the Core Strategy been prepared in accordance with the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended)?
3. Has the Core Strategy been prepared in accordance with the local development scheme of the Council?

4. Was the consultation process flawed in any way? Has the Council adopted a statement of community involvement and, if so, has the Core Strategy been prepared in accordance with that statement and the relevant regulations? [Ms K Dowty]
5. Has the Council carried out an appraisal of the sustainability of the proposals and prepared a report of the findings of the appraisal? Is there clear evidence to indicate why, having considered reasonable alternatives, the strategy in the Plan is the most appropriate response? Is the appraisal complete? Has sufficient regard to the appraisal been taken? [Ms K Dowty]
6. Does the Core Strategy have regard to national policies and advice contained in guidance issued by the Secretary of State?
7. Are the provisions in the Core Strategy compatible with the emerging National Planning Policy Framework?
8. Does the Core Strategy conform generally to the Regional Strategy (RS)? How can the Core Strategy conform to the Regional Strategy if the RS is scrapped? [Ms K Dowty]
9. What is the Council's attitude to the Regional Strategy? For example, does the Council see the Regional Spatial Strategy for the West Midlands (January 2008) as being largely superseded by the Phase Two Revision Draft Preferred Option December 2007 and the report of the Panel following the examination in public? Does the Council consider that the principles and aims with regard to waste in the Phase Two Revision Draft, and the work associated with it, provide a sound basis for consideration of the Core Strategy?
10. Does the Core Strategy have regard to the sustainable community strategy of the Council and the sustainable community strategy of any other authority within the county?
11. Has an Appropriate Assessment been undertaken under the Habitats Directive (and sent to the Secretary of State)? If not, has a scoping exercise shown that there is no need for such an assessment? Is the assessment complete? Has sufficient regard to the assessment been taken? [Ms K Dowty]
12. In so far as the Core Strategy contains policies that are intended to supersede other policies, is that fact stated in the plan and are the superseded policies identified?
13. Has the Council carried out its duty to co-operate in the preparation of the Core Strategy (Planning and Compulsory Purchase Act 2004 (as amended), Section 33A)?

Invited participants:

Worcestershire County Council
Ms K Dowty (1668)

INTRODUCTION AND MISCELLANEOUS MATTERS

Key Issue:

Whether the Core Strategy is justified, effective and consistent with national policy

1. Is the Core Strategy based on flawed data? [Ms K Dowty]
2. Is it appropriate for the Core Strategy to cover a period of 15 years? [Mr A Jones]

Independent Examination of the Worcestershire County Council Waste Core Strategy
Development Plan Document

3. Para 2.22: Should reference be made to other factors that cause greenhouse gases? [Mr A Jones]
4. Have sustainable objectives been met and addressed correctly in the Core Strategy? [Ms K Dowty]
5. Para 2.47: Are local facilities importing waste to remain viable?
6. Para 2.48: Should limits be placed on the import or export of waste?
7. Why is there importation of waste from the South West and East of England regions? Does this breach the core strategies of neighbouring authorities? Is this waste being double-counted? [Ms K Dowty]
8. Is the Core Strategy flexible enough to respond to climate change and the increasing need to recycle? [Ms K Dowty]
9. In the context of incineration, is there adequate control regarding carbon dioxide emissions?
10. Should the Council strengthen action on food waste? [Ms K Dowty]
11. Should the Council offer advice to the public? [Ms K Dowty]
12. Should the Council offer financial benefits to residents who recycle more? [Ms K Dowty]
13. Should the Council actively promote freecycle? [Ms K Dowty]
14. Should the Council seek to reduce waste transport miles? [Ms K Dowty]
15. Should the Council work with recycling companies on best practice? [Ms K Dowty]
16. Should the Council go to tender to get the best price for collection and disposal? [Ms K Dowty]
17. Should the Council incentivise supermarkets to use biodegradable bags and reduce food packaging? [Ms K Dowty]
18. Appendix 1: Are all the acronyms and abbreviations used in the text?
19. Appendix 1: Are all the glossary terms used in the text?
20. Appendix 2: Does Appendix 2 list all the waste policies? Are there any other waste policies that are to be saved and, if so, have they been reviewed for their relevance?

Invited participants:

Worcestershire County Council

Ms K Dowty (1668)

Mr A Jones (Represented by Mr S. Tranter) (1653)

Tuesday 13th March 2012 2.00pm

ENSURING SUSTAINABLE WASTE MANAGEMENT DEVELOPMENT

Key Issues:

Whether there are clear and appropriate development management policies that would govern waste management development at that, amongst other things, do not reiterate or reformulate national policy

Whether there is clear and effective provision for the safeguarding of existing waste management facilities

1. Policy WCS 7b): Is the grammar as intended?
2. Para 5.23 refers to Environment Agency advice to the effect that no waste management facilities should be permitted in Source Protection Zone 1. Is this the stance of the waste planning authority? Should the advice be a requirement of the Core Strategy?
3. Para 5.24 refers to Environment Agency advice to the effect that new sewage discharges to groundwater in an area of existing discharges are likely to lead to an unacceptable cumulative effect. Is this the stance of the waste planning authority? Should the advice be a requirement of the Core Strategy?
4. In Policy WCS 9, is realistic provision being made with regard to the matter of on-site renewable energy / use of low carbon sources? [Mercia Waste Management]
5. Policy WCS 9: Should the policy state that waste management facilities in themselves should be well designed so that they contribute positively to the character and quality of the area within which they are located?
6. Are the provisions in respect of the Green Belt consistent with national policy? [Ms K Dowty]
7. Should Policy WCS 10(z) be expressed in terms of allowing facilities that are not inappropriate or where very special circumstances to justify inappropriate development are demonstrated by the applicant?
8. Para 5.45 – not compromising Green Belt purposes: Is this an accurate reflection of national policy?
9. Green Belts: Should there be reference to the fact that Green Belt should be protected but that some types of waste management development have particular locational needs? These locational needs, together with the wider environmental and economic benefits of sustainable waste management, are material considerations that should be given significant weight in determining whether proposals should be given planning permission.
10. Does the Core Strategy consider adequately effects on human health? [Ms K Dowty]
11. Policy WCS 13: Would it be appropriate to safeguard existing waste management facilities but in circumstances where they meet local environmental and amenity criteria and do not pose a risk to sites protected at the European or National level?

Invited participants:

Worcestershire County Council
Ms K Dowty (1668)

Wednesday 14th March 2012 10.00am

LANDFILL AND DISPOSAL

Key Issue:

Whether there are clear and justifiable arrangements for landfilling hazardous, non-hazardous and inert waste including quantification of the facilities that will be required, guidance on opportunities for their location and regard to the timeliness of provision

1. Policy WCS 3: Does the adequacy of supply apply to all types of landfill – hazardous, non-hazardous and inert?
2. In Policy WCS 3, should the “exception” criteria also refer to proposals which are necessary to restore despoiled land, including mineral workings; are otherwise necessary to meet specific local circumstances; are supported by robust evidence of suitability and need arising from a shortage of local capacity that exists in the Plan period; and where geological conditions are suitable for landfill operations?
3. Where geological conditions are suitable, should the Core Strategy address sites for the final disposal of hazardous waste; also encourage the creation of separate appropriately engineered cells in landfills for stabilised non-reactive hazardous waste?
4. Is inappropriate encouragement given to the construction of bunds and embankments and features for noise attenuation and landscaping? Conversely, would the application of Policy WCS 3 (and Para 3.25), as written, preclude sensible schemes of this type?
5. In Policy WCS 3, is inappropriate support given for the landfilling of waste that cannot be recovered or recycled?
6. Is inappropriate encouragement given to landfill mining?
7. Para 3.20: Does the Council have a view on the acceptability, in principle, of landraising? Should the Core Strategy make clear the Council’s attitude?

Invited participants:

Worcestershire County Council

SPATIAL PORTRAIT, VISION AND OBJECTIVES

Key Issue:

Whether the Spatial Portrait, Vision and Objectives are sufficiently focussed, spatial and locally distinctive; also whether they address adequately matters of equivalency, deliverability and timely provision

1. Is there adequate reference, within the Core Strategy, to the relevant provisions of the various community strategies and how those provisions are cognisant of and are reflected in the Core Strategy? To what extent does the Core Strategy reflect the vision of the community strategies?
2. In what ways does the Core Strategy provide a framework under which communities can take more responsibility for their own waste?
3. Does the Core Strategy take account of the strategies of Waste Disposal Authorities for responding to the Landfill Allowance Trading Scheme?
4. In Para 2.4, why is reference made to geological SSSIs in Worcestershire *and Herefordshire*? Are figures not available for Worcestershire alone?
5. Para 2.6 and Fig 2: Is it appropriate for all the features to be “protected”?
6. In Para 2.10, why is reference made to Grade 1 agricultural land in Worcestershire *and Herefordshire*? Are figures not available for Worcestershire alone?
7. Waste Management and Fig 3: Would it not be appropriate to explain, early on in the text, why MSW arisings from both Worcestershire and Herefordshire and being taken and considered together?
8. Would it be better to replace Fig 4 with a table quantifying more accurately projected arisings over time in the different categories of waste?
9. From Table 1, the approximate current waste management capacity is 1,275,000 tonnes. Would it be better to use this figure in Para 2.33?
10. Does Fig 7 need to be amended to reflect the up-dated re-use and recycling capacity gap figure used in Table 2?
11. For completeness, should Fig 7 show current capacity and requirements for landfill and disposal?
12. Fig 8 (and elsewhere): Should Fig 8 show a more detailed picture (table) of the capacity gap (as in Appendix 4) with specific identification (as a basis for policy) of MSW, C&I waste, C&D waste and hazardous waste at key dates? In respect of MSW, should the fraction to be composted be identified as a separate figure (with separate recycling targets)?
13. Under the JMWMS, is there an intention to receive, sort, recycle or otherwise treat C&I waste at the same facilities as MSW?
14. Para 2.42: Is the household waste site at Tenbury Wells to be redeveloped for some other form of waste management facility or for something else?
15. Para 2.52 and the on-going export of waste from Worcestershire (or importation into Worcestershire): Are the exporting and receiving regions and waste planning authorities happy

for existing arrangements to continue? Have they said so? How does this square with their own development plans? What sort of contractual commitments are in place and are these taken into account in the provisions of the Core Strategy?

16. Should the Council be aiming to encourage provision for the treatment of certain types or quantities of waste that are currently managed outside the County but which it would be sensible to manage within Worcestershire in the longer term?
17. In the Vision, should there be a commitment to timely provision. For example, Para 2.54a could read, "By 2027, through timely provision over the Plan period, Worcestershire will have achieved..."; in Para 2.54b, "Waste in Worcestershire will be managed increasingly as a resource..."; and in Para 2.54c, "Progressively, homes and businesses will produce less waste...".
18. Para 2.54c, final sentence: Is the grammar as intended?
19. Para 2.57: Is there a single Strategic Flood Risk Assessment for the whole of the county or is Para 2.57 a reference to the City, Borough and Districts' SFRAs as referred to in Para 3.7?
20. Para 2.58: Does "upper levels of the geographic hierarchy" mean Levels 1 and 2? For clarity, would it be better to say so?
21. Para 2.60: Does "upper levels of the geographic hierarchy" mean Levels 1 and 2? For clarity, would it be better to say so?
22. Para 2.62: To emphasise the need for timely delivery, should Para 2.62 say that new facilities will be developed "throughout the Plan period..."?
23. Table 3: Are the land requirement estimates compatible with the range suggested in "Planning for Waste Management Facilities: A Research Study" (NPG 17)?
24. Objective WO3: What interim targets have been set for other key dates, eg 2015/16 and 2025/26? What baseline figures are being achieved (2010/11)?
25. Objective WO3: How compatible are these targets with other "authoritative" targets eg from the Regional Strategy or from Waste Strategy for England 2007?
26. Objective WO3: Should the objective be one of zero waste growth in all waste streams, not just in landfill or disposal?
27. Objective WO5: How is timely provision going to be achieved (provision to meet immediate shortfalls and then steady provision by key dates through the Plan period)?

Invited participants:

Worcestershire County Council

Wednesday 14th March 2012 2.00pm

RE-USE, RECYCLING AND "OTHER RECOVERY"

Key Issue:

Whether there are clear and justifiable arrangements for the re-use, recycling and "other recovery" of waste including provision for facilities of the right type, quantification of the facilities that will be required and regard to the timeliness of provision

1. There is a need to provide opportunities for new waste management facilities *of the right type and at the right time*. This means greater specificity with regard to the types of facilities that will be needed and that should be encouraged; also in terms of the timing of their provision.

One way of driving forward necessary provision would be to have a policy quantifying the amount of provision of different categories that it is envisaged would be needed over identified periods of time. Such a policy might read (fictitious figures):

Policy X – New waste management capacity to be provided

Over the period to 2025/26, provision will be made for the delivery of additional capacity for the re-use, recycling and "other recovery" of waste as follows:

By 2015/16

*200,000 tonnes for the re-use and recycling of municipal and commercial and industrial waste;
50,000 tonnes for the composting of municipal waste;
100,000 tonnes for the re-use and recycling of construction and demolition waste;
250,000 tonnes for "other recovery" of municipal and commercial and industrial waste.*

2015/16 to 2020/21

*A further 40,000 tonnes for the re-use and recycling of municipal and commercial and industrial waste;
A further 25,000 tonnes for the composting of municipal waste;
A further 50,000 tonnes for "other recovery" of municipal and commercial and industrial waste.*

2020/21 to 2025/26

*A further 200,000 tonnes for the re-use and recycling of municipal and commercial and industrial waste;
A further 25,000 tonnes for the composting of municipal waste;
A further 10,000 tonnes for "other recovery" of municipal and commercial and industrial waste.*

The policy would need to be backed up by details of projected arisings; targets by key date for re-use, recycling or "other recovery"; existing capacity; and capacity to be provided (as in the policy).

2. Under the MSW heading, should separate attention be given to composting? This would necessitate reference to projected arisings; targets by key date for recycling; existing capacity; and capacity to be provided. To highlight composting would help provide a better steer to future provision and enable recognition of the particular considerations that apply to open windrow (or in-vessel) facilities.
3. Is the discussion on the capacity gap clear and accurate? [Mercia Waste Management]

4. Is an appropriate approach being taken to provision for hazardous waste? Given the capacity gap, and movement across borders, should encouragement be given to the provision in appropriate circumstances of hazardous waste management facilities?
5. Para 3.11 says that the Environment Agency seeks to ensure that the most environmentally effective means of waste water disposal is used. Is this the stance of the waste planning authority? Should the stance be a requirement of the Core Strategy?
6. Para 3.12: Should greater emphasis be given to on-site management of waste where it arises (for re-use, recycling and other recovery)?
7. Should specific encouragement be given to facilities for the handling of C&D waste including on-site provision at construction and demolition sites; also to prioritising the identification of new sites for facilities to store, treat and recycle soils and C&D waste?
8. Should there be some reference to the need or otherwise to plan for radioactive waste?
9. Should encouragement be given to the provision of facilities to manage other particular types of waste – e.g. where existing provision is lacking or likely to be lacking in the future?
10. Would it be appropriate to recognise the opportunity for MSW and C&I waste to be treated at the same facilities (e.g. as a steer to provision under the JMWMS)?
11. Is Policy WCS 2 technologically neutral in the sense that “other recovery” only covers energy recovery and reprocessing waste into materials that are to be used as fuels?

Invited participants:

Worcestershire County Council
Mercia Waste Management (1679)

Thursday 15th March 2012 10.00am

ENERGY FROM WASTE PROPOSAL, HARTLEBURY TRADING ESTATE

Key Issue:

Whether the Energy from Waste proposal at the Hartlebury Trading Estate should be the subject of a strategic allocation or otherwise recognised in the Core Strategy

1. Is the proposed Energy from Waste facility at Hartlebury central to achievement of the strategy and, if so, should it be the subject of a strategic allocation?
2. Will the Core Strategy need to be modified in any fundamental way if the application for the Hartlebury Energy from Waste scheme is rejected?
3. Does the Core Strategy contain any inappropriate policy encouragement to the incinerator at the Hartlebury Trading Estate? [Mr P Luff MP]
4. Having regard to the Energy from Waste proposal at Hartlebury, does the Core Strategy make adequate provision in terms of greenhouse gases; management at the highest appropriate level of the waste hierarchy; locating developments where best suited to meet the needs of local

communities or to minimise distance moved by road; recovering resources from waste; energy and heat recovery; recovering value from residues; highway safety and congestion; ensuring sustainable waste management development; community involvement; compatible land uses; the protection of environmental assets; Green Belt policy; amenity; and social and economic benefits? [Mr A Jones]

5. Is the Core Strategy technology specific / biased towards Energy from Waste through incineration?
6. Is it necessary or appropriate to amend the Key Diagram such that the Hartlebury Trading Estate is encompassed within the Level 1 Kidderminster Zone? [Mercia Waste Management]
7. Is the Council's waste contractor determining technology and the location of waste facilities? [Ms K Dowty]
8. Should the implementation section of the Core Strategy make reference to the proposed Energy from Waste facility at Hartlebury and the envisaged contribution to the waste management needs of the county?

Invited participants:

Worcestershire County Council

Mr P Luff MP (908)

Mr A Jones (Represented by Mr S. Tranter) (1653)

Mercia Waste Management (1679)

Ms K Dowty (1668)

LOCATION OF NEW WASTE MANAGEMENT DEVELOPMENT

Key Issue:

Whether there is clear and justifiable guidance on the location of new waste management development

1. Should all figures and mapping relate to both Worcestershire and Herefordshire? [Mr A Jones]
2. Should a location central to the counties and Worcestershire and Herefordshire be sought for the treatment of waste arisings from the two counties or, alternatively, smaller localised facilities? [Mr A Jones]
3. Is the burning of recyclable materials acceptable at locations that preclude the use of heat recovery? [Mr A Jones]
4. Should developments be discouraged where energy recovery cannot be optimised and demonstrated? [Mr A Jones]
5. Is it appropriate to import waste from Herefordshire?
6. In terms of the geographical hierarchy, should open windrow composting be treated differently?
7. Should the Core Strategy refer to ensuring a range of sites of different size and geographical distribution; good accessibility to the source of waste arisings and/or end users; and good transport connections including, where possible, rail and water?

8. Should there be policy provision for the management of waste arising from areas of low population and scattered communities?
9. Policy WCS 4: Should there be specific reference to looking for opportunities for on-site management of waste where it arises?
10. Policy WCS 4: Should there be specific reference to looking for opportunities to co-locate facilities together with complementary activities?
11. Policy WCS 4: Should emphasis be given to the re-use of previously developed land?
12. Policy WCS 4: Should the matter of waste management facilities on open land, including land within the Green Belt, be the subject of specific guidance?

Invited participants:

Worcestershire County Council

Mr A Jones (Represented by Mr S. Tranter) (1653)

Mercia Waste Management (1679)

Friday 16th March 2012 10.00am

IMPLEMENTATION AND MONITORING

Key Issue:

Whether there are clear arrangements for monitoring the Core Strategy and reporting the results as part of a delivery strategy with clear targets and measurable outcomes

1. Is the Core Strategy deliverable and capable of being monitored? [Ms K Dowty]
2. Should Figure 16 (Comparative gate fees) include the cost of incineration gate fees?
3. Para 8.4, final sentence: Is the grammar as intended?
4. Para 8.12 (and elsewhere): "Green Belt" not "greenbelt".
5. Para 8.21 – no robust information about C&D arisings: Is this an appropriate basis for setting a target? Do other sources set a more authoritative target?
6. Para 8.44: Reference could be made to the section on community involvement particularly Para 5.60.
7. Para 8.55: Is the grammar as intended?
8. Monitoring Schedule – Indicator 13 - Permission for new development in Green Belts: Should the target include inappropriate development justified by very special circumstances?
9. Monitoring Schedule – Indicator 13 - Permission for new development in Green Belts: Is there confusion over the review trigger? Whether or not a proposal constitutes inappropriate

development does not depend on a demonstration of very special circumstances. This is a further test in the justification of inappropriate development.

10. Monitoring Schedule – Indicator 14 - Permission granted in accordance with highways advice: What is the justification for the review trigger?
11. Monitoring Schedule – Indicator 15 - Progress toward equivalent self-sufficiency: What is the justification for the review trigger?
12. Monitoring Schedule – Indicator 16 - Waste sent to landfill: What is the justification for the review trigger? Should not the depletion over time of landfill capacity of different types be monitored?
13. Monitoring Schedule – Indicator 17 - Re-use, recycling and “other recovery” of waste: Interim targets also required.
14. Monitoring Schedule – Indicators (15) and 20 to 22 – Indicators and targets: Interim targets also required.
15. Monitoring Schedule – Indicator 23 – Consultation Statement: Does the review trigger allow for small scale developments where a consultation statement would not be appropriate? Is there a need for a footnote?
16. Monitoring Schedule – Indicator 25 – Is the five-year period in the review trigger too long?

Invited participants:

Worcestershire County Council
Ms K Dowty (1668)

PROPOSED MODIFICATIONS AND INSPECTOR’S CLOSING REMARKS

Invited participants:

All Welcome