

First Draft Submission Consultation

Consultation Response Document

December 2010

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Introduction

This document includes comments made up to 22nd November 2010. Any comments received after this date will be presented in a separate document.

A letter and information sheet was sent to 589 organisations and individuals, with a letter questionnaire and summary document being sent to a further 622 stakeholders by post. Approximately 298 email contacts (some of which might also have been contacted by post) were sent the information sheet, summary document and questionnaire. 4 further copies of the report and 6 copies of the summaries were posted out on request.

Documents were made available in Hubs, libraries and on the Council's website. Media releases were sent and public notices were placed in County newspapers. The consultation was publicised on Worcestershire County Council's homepage and listed on the Consultation Portal used by the Council and Partners. Stories were also put on Facebook and Twitter.

We received 43 responses by written questionnaire (reference prefix PQ), 17 online responses (reference prefix OR) and 35 representations made by letter or email (reference prefix WR), giving a total of 95 responses. This gives an overall response rate of 7.8%.

Summary of responses

Our responses refer to policy and page references in the First Draft Submission Consultation document. These may change in future documents.

General issues

Several respondents raised concern regarding the treatment of Herefordshire's Municipal Solid Waste in Worcestershire. The management of Municipal Solid 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 require that some facilities for the treatment of MSW are/will be located in Herefordshire e.g. composting and bulking plant, but the Waste Core Strategy must make provision for facilities to manage both counties' Municipal Solid Waste.

Many of comments received made specific reference to either incineration or the planning application for an Energy from Waste facility that is currently being considered by the Council (application reference 10/000025/CM). The Development Control team has been made aware of all comments received that made specific reference to this application. All relevant issues will be considered in the development of the Waste Core Strategy, particularly those that relate to impacts of development on habitats and protected species, managing the amenity impacts of waste management facilities and promoting recycling and the

treatment of waste at the highest appropriate level of the waste hierarchy; however the strategy is not technology specific and does not state that there is a requirement for or propose any locations specifically for incineration or Energy from Waste facilities.

There were some complaints that the document was lengthy. The document is necessarily complex, however we produced a 4 page information sheet and a 20 page summary document which were available on request and on our website. Questions were also flagged up at relevant points in the text and page references given on the questionnaire to make it as easy as possible to complete. We will endeavour to make the final document as clear and concise as possible.

Several consultees commented that responses which were made to previous consultations had been taken into account in developing the *First Draft Submission Consultation Document*.

Setting the Context

In general the overview was felt to adequately identify the main issues which make the county distinctive, however it was felt that greater reference/consideration should be given to:

- the Joint Municipal Waste Management Strategy
- Hazardous waste
- Agricultural waste
- Specific issues such as land stability.

Some issues were raised in relation to the quality and reliability of the data used. It is widely acknowledge that there are limitations in waste data, however all calculations and estimates are based on the best available information. Defra has been developing improved data collection for some years, we will use this if it becomes available.

Responses highlighted a need for clarification regarding the Geographic Hierarchy presented. Questions were also raised about the concepts of 'actual' and 'aspirational' distribution. We will reconsider how to proceed with this.

Vision and objectives

There was overall support for the vision. In general it was acknowledged that it covered the main points in a short statement, however some respondents felt that it needed to be made more locally distinctive and that it should reinforce the role of the waste hierarchy. We will make changes to incorporate these points.

The objectives also received general support, and those who disagreed often made specific reference to incineration in explaining their answer. The Waste Core Strategy is not technology specific. However, these comments may be in response to a planning application for an Energy for Waste facility that is currently being considered by the Council (application reference 10/000025/CM). The Development Control team has been made aware of all comments received that make specific reference to this application.

The phrase 'do everything possible' was felt to be unduly onerous and objectives will be reviewed giving consideration to this point.

Identification of Areas of Search

In general the method was supported; however it was felt to be overly complicated. This will be reviewed and simplified, with greater clarity in the policy.

Stage 1 of methodology was based on the types of compatible land use put forward in the West Midlands Regional Spatial Strategy. Questions were raised about some of the types of land identified, in particular redundant agricultural and forestry buildings and sites with current use rights for waste management. The approach will be refined to take into account the issues raised in relation to these types of land. There was, however, overall support of future waste management development on industrial estates.

Stage 2 of the methodology is based on national and local policy priorities. Concerns were raised that some issues which contribute to the local distinctiveness of the County (such as greenbelt, local geological features and local nature reserves) were treated as secondary constraints. In deciding which issues were to be treated as primary constraints and which as secondary, those which are given priority in national policy are identified as primary constraints. It would not be in accordance with those policies to give the features identified as secondary constraints equal weight; however policies WCS 2 and 4 protect all of these features from unacceptable adverse impacts. This will be further developed to reinforce the importance of these features. This stage of the methodology also considered flood risk. Concern has been raised over the appropriateness of the approach taken and this will be refined in consultation with the Environment Agency.

Stage 3 is based on officer and consultant's observations during site visits. Following the comments received in response to this consultation this stage will be refined in discussion with the transport department at the County Council and the Highways Agency to take account of issues raised relating the suitability of highways and multi-modal potential.

Stage 4 is based on information regarding waste arisings and will be developed to better define the areas referred to and give greater clarity to this aspect.

Concern was raised that the identification of areas of search does not give full consideration to social or amenity impacts. As these impacts will vary depending on the nature of the proposal it would not be possible to undertake a meaningful assessment at this stage. However these issues are considered in detail in policy WCS4, and will be assessed as proposals are brought forward.

One respondent felt that the method had been developed to support a planning application for an Energy from Waste facility that is currently being considered by the Council. This was echoed by several other respondents. However the method assessed 160 sites and identified 58 as Areas of Search. Several sites have been put forward for assessment as Areas of Search. These will be considered using the same methodology.

To take into account comments made, this section will be developed to include a definition of scale and more detailed consideration of Waste Water Treatment facilities and cross-boundary issues such as air quality impacts.

Policy proposals

Many of the issues raised in relation to the areas of search were echoed in comments made on the policy proposals. These will be considered when revising our approach. It is important to remember that the Waste Core Strategy should be read as a whole and that other Development Plan Documents and Local Development Documents prepared by the City, Borough and District Councils in Worcestershire will also be taken into account when determining planning applications.

There were concerns about how some elements of policies would be implemented. One key concern was the use of the word 'maximise' in several of the policies, this will be replaced with the word 'optimise' where appropriate, to give great flexibility and deliverability.

There was also concern that too much emphasis was given to the minimisation of waste miles through the use of sustainable transport modes. Conversely the Sustainability Appraisal carried out of the First Draft Submission consultation document recommended that stronger encouragement should be given for the use of sustainable transport modes. These considerations have been weighed up and we will proceed with a balanced approach that aims to minimise waste transport by road through the use of both sustainable transport modes and through directing new development close to waste arisings, onward treatment facilities and end users.

Following this consultation the procedural issues will be discussed further with the County Council's development control team and the City, Borough and District Councils in Worcestershire. Other specific issues will be addressed as the policies are revised.

Full consultation comments and the council's initial response

This section is organised by question and details all responses made. Original copies of the responses made can be viewed on request.

Our responses refer to policy and page references in the First Draft Submission Consultation document. These may change in future documents. Copies of all of the consultation documents and further copies of this document are available on our website www.worcestershire.gov.uk/wcs, or on request.

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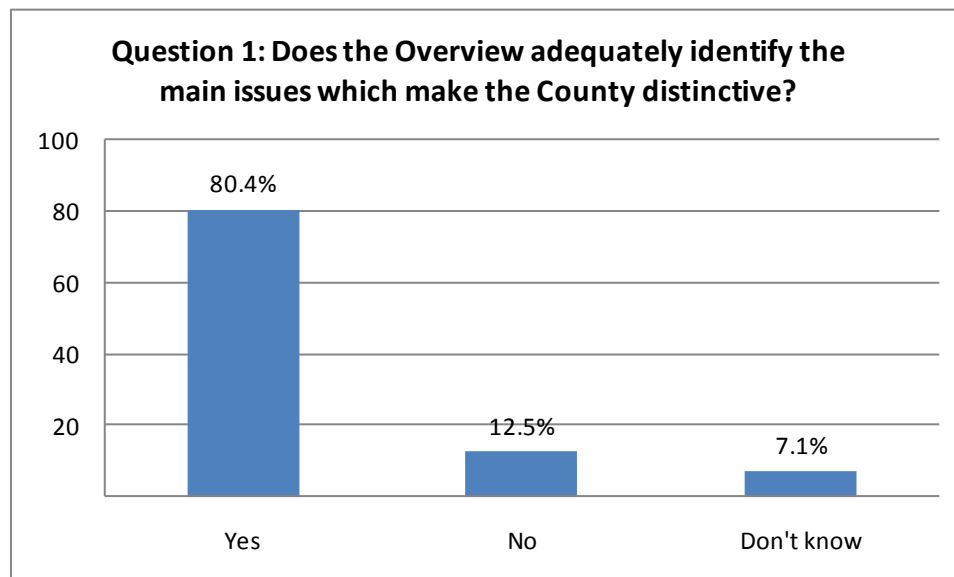
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Overview of Waste Management in Worcestershire

Question 1: Does the Overview adequately identify the main issues which make the County distinctive?

	Yes	No	Unsure/ Don't Know
Does the Overview adequately identify the main issues which make the County distinctive?	45	7	4



Base: 56 respondents

Reference	Name/Organisation	Summary of comments	Initial officer response
PQ6-188	<i>M&M Timber Co. Ltd, Kidderminster</i>	Need more management in the City and other urban areas	Agreed. The strategy is intended to achieve this through the geographic hierarchy.
WR4-735	<i>The Coal Authority</i>	There are limited areas of surface coal resources within Worcestershire, these are located within the following broad locations:	We will refer to the geographical distribution of these surface coal resources. Safeguarding policies are already part of

Reference	Name/Organisation	Summary of comments	Initial officer response
		ground then specific written permission of the Coal Authority may be required.	
OR4-680	<i>Bromsgrove District Council</i>	Overall, the main issues that make Worcestershire unique are adequately identified within 'Setting the context'.	Support noted.
OR5-1707	<i>Mr Brett</i>	The account 1.5 to 1.7 (<i>summary document</i>) is adequate for Worcestershire, but takes no account of waste arisings from outside the county, although this is dealt with (inadequately) later. Since this is an important issue, not least for sustainability (WO1) it should be addressed at this point and referred to in future.	Agreed that this is an important issue. The full document contained more detail on imports and exports on a national and regional basis (pages 21 to 24). This is based on the best available information from the Environment Agency.
OR6-800	<i>Herefordshire & Worcestershire Earth Heritage Trust</i>	Agree with the issues identified and welcome the inclusion of a description of Worcestershire's natural physical assets as an introduction, which include geodiversity.	Support noted.
PQ20-502	<i>Pencroft Ltd</i>	MSW from Herefordshire is briefly mentioned but not expanded on. How does this comply with the requirements of WO7? Why shouldn't Herefordshire deal with its own MSW?	The management of Municipal Solid 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. Mercia Waste Management is the council's contractor for the implementation of its integrated PFI waste management contract which only deals with municipal solid waste.

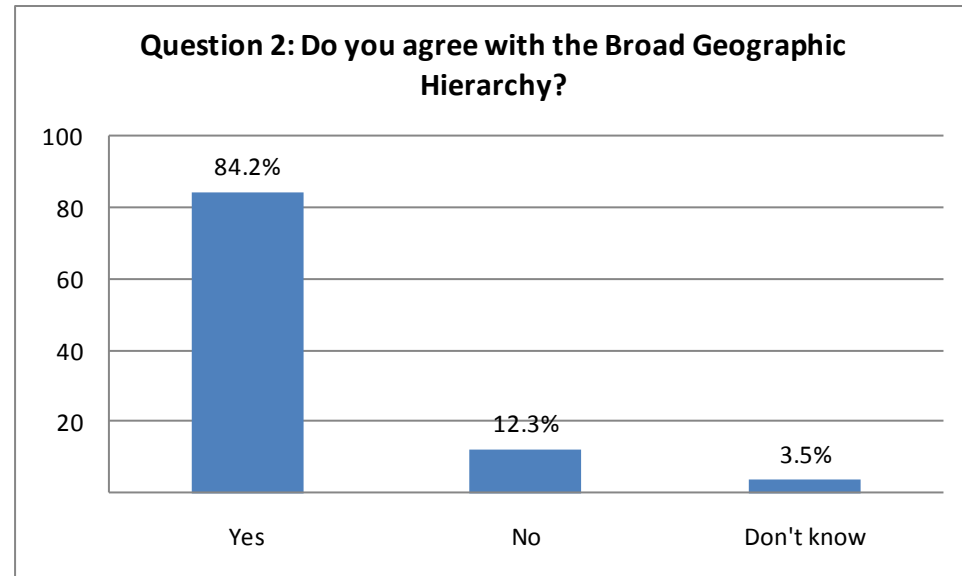
Reference	Name/Organisation	Summary of comments	Initial officer response
			All other waste management issues will be addressed through the normal competitive operations of the market.
PQ24(also WR9) - 1645	<i>Mrs L Brookes</i>	It points to not having an incinerator. You already breach green house emissions, why add to this? Who worked out your figures?	The Waste Hierarchy is based on mitigating climate change impacts and the Strategy requires waste to be managed at the highest appropriate level of the waste hierarchy.
WR30-716	<i>English Heritage</i>	We welcome the general approach and content of section 2 on 'Setting the Context'. In particular, we welcome and support the inclusion of the summary on the historic environment (2.6).	Support noted.
PQ27-1598	<i>Elgar Foods Ltd</i>	Dont know about other regions, cannot comment.	Noted.
PQ30-1649	<i>EM Jones</i>	These issues do not make WCC distinctive merely that the objectives of reducing, re-using, recycling, reducing greenhouse gas emissions, protecting environment and amenity, minimising waste miles are those of every county in the country.	The overview considers the environmental, economic, transport and waste management characteristics of the county, alongside the intention to follow the waste hierarchy.
PQ31-642	<i>Rushock Parish Council</i>	Not especially - but certainly dealing actively and efficiently with the issues and its responsibilities.	Noted.
PQ36-688	<i>Herefordshire and Worcestershire Joint Waste Resource Management Forum</i>	2.21 omits reference to small bring recycling sites located across the county and also to District Council Operations depots which form part of the municipal waste management infrastructure. In our view these should be included to provide a holistic picture and provide the link to subsequent references to provision of small bring recycling sites in particular.	Noted, change to be made.

Reference	Name/Organisation	Summary of comments	Initial officer response
		Please note paragraph 2.8 should refer to "Upton-Upon-Severn"	
PQ37-1622	Worcester City Council	Paragraph 2.11 - Worcester is also part of the Central Technology Belt.	Noted, change to be made.
PQ38-1679	Axis (on behalf of Mercia Waste Management)	<p>There is no reference to the Joint Municipal Waste Management Strategy (JMWMS) and the JMWMS Review. This is particularly important given the significant weight that should be attached to the JMWMS. This is clarified in Defra's Guidance on Municipal Waste Management Strategies (July 2005) which identifies at paragraph 4.4 what the role (importance) of such a strategy is:</p> <p><i>"Thorough strategic planning is vital in seeking to meet these challenging objectives and Strategies should reflect both community aspirations and ensure cost-effective compliance with all existing statutory obligations. The development of the Municipal Waste Management Strategy should be a dynamic process and should result in a clear framework for the management of municipal waste, and waste from other sectors as appropriate. This should set out how authorities intend to optimise current service provision as well as providing a basis for any new systems or infrastructure that may be needed. The Strategy should act as an up to date, regularly reviewed, route-map for further investment required."</i></p> <ul style="list-style-type: none"> • We would suggest that if reference to the JMWMS is made in Paragraph 2.21. The 	The JMWMS is referred to in the Policy Context section. Reference will be made more clearly in the Waste Management section.

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>reference could state that the provision of facilities for the management of MSW is detailed in the JMWMS which has been prepared jointly by Worcestershire and Herefordshire.</p> <ul style="list-style-type: none"> • The Overview should state that the JMWMS Review is being prepared jointly with Herefordshire and that the MSW is presently managed by the two counties. 	
PQ42-717 (L)	<i>Natural England</i>	<p>Overall Natural England is pleased to see specific references to the following; Malvern Hills AONB, Cotswolds AONB, Abberley and Malvern Hills Geopark, The County Council's Landscape Character Assessment and web tool, flood risk and water capacity, historic environment, climate change and in paragraph 2.7 Worcestershire's biodiversity.</p> <p>We acknowledge the efforts to address our comments made on the emerging preferred options (February 2010) in relation to paragraph 2.15 (transport section). However, we do not feel that the additional text on local road congestion fully addresses the point that we made in our February response - which is that long distance movements across the county are not desirable. This should be stated and specific reference made to more sustainable transport options in the context of climate change mitigation.</p>	<p>Support noted.</p> <p>Paragraph 2.15 is part of the section "setting the context" which describes the features of the county as it is at present. It would therefore be inappropriate to use this section to set value judgements about long distance movements. Section 3 translates the issues, needs and constraints from "setting the context" into a meaningful vision and objectives. The vision states that "facilities will be located where they minimise the need to move waste by road".</p>

Question 2: Do you agree with the Broad Geographic Hierarchy

	Yes	No	Unsure/ Don't Know
Do you agree with the Broad Geographic Hierarchy?	48	7	2



Base: 57 respondents

Reference	Name/Organisation	Summary of comments	Initial officer response
PQ6-188	<i>M&M Timber Co. Ltd, Kidderminster</i>	<i>Answer No.</i> There is no established relationship between Worcester City and Kidderminster. Kidderminster area should be considered in its own right. Including Hartlebury.	Agreed. The strategy includes Hartlebury in the "Kidderminster area" and this will be clarified. The tiers in the hierarchy indicate the importance of the settlements in terms of waste management but are not intended to show any links between them.
OR5-1707	<i>Mr Brett</i>	In general it is adequate, but the information on sub-regional movements is just not good enough, given the management options available. More research should be carried out to give better assurance on these figures.	Agreed that this is an important issue. The full document contained more detail on imports and exports on a national and regional basis (pages 21 to 24). This is based on the best available information from the Environment Agency. Defra has been developing improved

Reference	Name/Organisation	Summary of comments	Initial officer response
			data collection for some years, we will use this if it becomes available.
PQ18-618	<i>Malvern Wells Parish Council</i>	Malvern group better geographically and organisationally with Worcester City and Wychavon.	Noted and agreed. The hierarchy considers the significance of each settlement in terms their waste management role. Malvern is grouped with Bromsgrove and Droitwich due to their similar roles rather than their geographic links.
PQ24(also WR9) - 1645	<i>Mrs L Brookes</i>	Any major site development should be in or around Worcester which is central. It is easier to bring all waste to Worcester than to Hartlebury. But smaller local plants are needed - not one big one.	The broad geographic hierarchy recognises Worcester area, Kidderminster area and Redditch area as the three largest sources of waste arisings and promotes new waste management development of all sizes in these areas.
PQ24(also WR9) - 1645	<i>Mrs L Brookes</i>	(Diagram at bottom p2). Hereford should deal with its own waste. Not send it to Worcestershire. Waste should be dealt with in county, so Herefordshire should do this? Is this arrangement to suit your contractor not what is best for the county. Who collated these figures? Who provided the data.	The reviewed Joint Municipal Waste Management Strategy sets out that municipal solid waste for the 8 councils in Herefordshire and Worcestershire will be managed in an integrated way, the contractor has to comply with this. All other waste management issues will be addressed through the normal competitive operations of the market. The data used has been ratified by Defra.
WR32-1624	<i>Wyre Forest District Council</i>	Kidderminster Area The document identifies the Kidderminster area as including Kidderminster, Stourport-on-Severn and Bewdley. All three of the towns are included under this one area as this reflects the inter-relationships between the three towns. It also reflects the waste arisings and management that currently exists within the District. Although the hierarchy includes all three towns, the areas of search for new facilities are focused primarily on	Support noted.

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>Kidderminster, as the strategic centre of the three. There appears to be recognition of the role that Kidderminster plays in accommodating and dealing with the waste arisings of the three areas, given their relative proximity</p> <p>WFDC consider this to be an acceptable approach to waste management within the District. Crucially, the areas of search identified for potential new waste management facilities are focussed primarily in Kidderminster, identifying the role that the largest town, with the available sites, plays in dealing with the waste arisings of the three towns within the District. This approach is also considered more acceptable than previous iterations of the document which sought to include Bewdley as a stand alone settlement much higher up in the hierarchy.</p> <p>Rural Areas</p> <p>The other category of significance is the rural areas, identified as the last stage of the hierarchy. WFDC generally agree with what is outlined in terms of the rural areas falling at the end of the hierarchy. However, it may be useful to include more comment on the hierarchy and how it is proposed to be used. For example, identifying that rural areas would be the last resort or would only be acceptable as locations for waste facilities in certain, exceptional, circumstances.</p> <p>WFDC object to the 'actual distribution' levels and feel that the percentage of each of the 'main' areas to accommodate new facilities should</p>	<p>Agreed. Changes will be made to clarify when waste management development in rural areas will be considered acceptable.</p> <p>Noted, change to be made.</p>

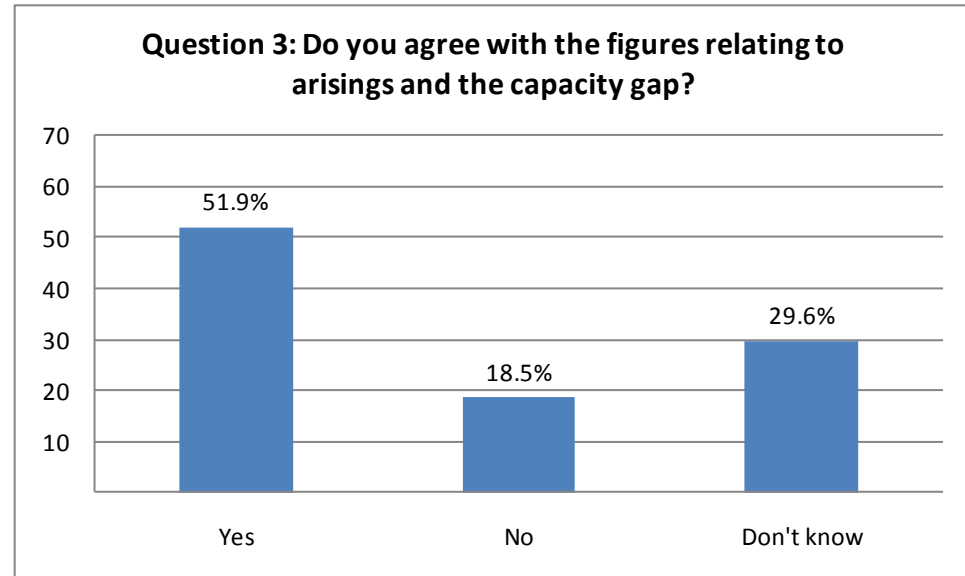
Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>remain aspirational at 20%. Reference to actual distribution should be removed as there is a danger that this makes the plan too prescriptive. The remaining aspirational targets allow the plan to be flexible and responsive to change. Furthermore, it would appear that the figures of 'actual' distribution are based on sites currently available, which is not considered to be a plan-led approach; as it does not factor in new sites that may come forward as part of the LDF process. The potential for new sites to come forward is recognised as an important consideration in para 4.28.</p> <p>The other concern is that by setting actual distribution figures it could end up stifling development, especially in the three 'main' areas, this is because if any area reached their 'actual distribution' they could conceivably not permit any further waste development. By keeping the figures aspirational it allows the plan to remain flexible to meet demand as it arises.</p>	<p>The purpose of showing "actual" as well as "aspirational" distribution was to illustrate the proportion of land which had been identified as <i>areas of search</i> in each settlement, it is not intended to stifle development or be used as a reason for refusal. This concept will be reconsidered.</p>
PQ30-1649	EM Jones	<p>There is not yet a complete recycling policy in place. This council is tied to its contractor and its only method of incineration. The power of this contractor is shown for instance by 'contractual complications with county council and its contractor' with regard to businesses in Worcester City trying for four years to get its waste recycled as reported in Worcester News Nov 2010. This it is reported will save the council between £40-50,000. If every restaurant, shop and business in Herefordshire and Worcestershire were able to do this many more thousands of pounds could be</p>	<p>The Waste Core Strategy is not technology specific.</p> <p>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. Any application for planning permission will be determined on its merits, judged on the basis of the Development Plan.</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
		saved.	
PQ32-internal	<i>Worcestershire County Council Economic Development</i>	Has adequate consideration been given farm waste	More explicit reference will be made to agricultural waste.
PQ36-688	<i>Herefordshire and Worcestershire Joint Waste Resource Management Forum</i>	<p>2.28 Please amend the reference to the South Worcestershire Joint Core Strategy to read South Worcestershire Development Plan.</p> <p>Also please delete references to “Worcester and its Expansion Areas.” There are sites to the North of Hallow included on the map as falling within this area. It is considered that whilst there may well be existing or possible functional / operational / waste arising linkages to such sites beyond Worcester, to link them to possible expansion areas or expansion of the City generally is inappropriate and is likely to be misleading to the public. It might be possible to rename the area “Worcester and its environs” or “Worcester and its immediate surroundings”? Similar references In Table 7 (page 43), Table 8 (page 45) and Figure 16 should be amended in the same way.</p> <p>There should be a clearer statement that the housing growth assumptions set out in Figure 2B are likely to be subject to review by District Councils through the development of ‘local housing aspirations’ given the revocation of Regional Spatial Strategy.</p> <p>It is considered that paragraphs 2.13 to 2.15 (transport) should make greater reference to the constraints created by the existing road network</p>	<p>Change to be made.</p> <p>Change to be made.</p> <p>Agreed.</p> <p>Noted, this issue will be discussed with the County Council's Highways department and the Highways Agency.</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>with respect to congestion and lack of capacity to support proposed growth and additional traffic movements, such as around Worcester. Such references would give greater credence to the WCS stance that the LTP is a driver with respect to the content of the WCS. It would also highlight that growth generating additional waste arisings may actually be dependent upon significant infrastructure investment and therefore subject to strict phasing. Further, such constraints may apply to major / strategic waste facilities.</p> <p>Suggest that the status of the proposed Eco Town shown on the diagram should be checked.</p>	Change to be made.
PQ37-1622	<i>Worcester City Council</i>	<p>Figure 2a and 2b will need revising in the light of the demise of the Regional Spatial Strategy. However, the revised figures when agreed should not affect the hierarchy.</p> <p>Para 2.28 - the South Worcestershire Core Strategy has been re-named the South Worcestershire Development Plan.</p>	<p>This will be considered further when the status of the RSS is clarified.</p> <p>Noted, change to be made.</p>
PQ42-717 (L)	<i>Natural England</i>	<p>Natural England are content with the hierarchy as it is broadly in line with the now rescinded Regional Spatial Strategy and with developing Core Strategies of other local authorities in Worcestershire.</p>	Support noted.

Question 3: Do you agree with the figures relating to arising and capacity gap?

	Yes	No	Unsure/ Don't Know
Do you agree with the figures relating to arising and capacity gap?	28	10	16



Base: 54 respondents

Reference	Name/Organisation	Summary of comments	Initial officer response
Hazardous waste			
WR15-695	<i>Gloucestershire County Council</i>	<p>Generally, the data basis of this document appears to be very comprehensive. However, it is not clear how or where the hazardous waste that arises in Worcestershire will be managed in future years.</p> <p>Table 4 on Page 19 indicates that there is no capacity gap for the hazardous waste stream (even right up to 2034/5), but how has this been</p>	<p>Noted, change to be made.</p> <p>Noted, change to be made.</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>calculated given that the document does state in Table 3 that the current (2008) hazardous waste arisings are over 46,000 t per year and the managed figure will be higher</p> <p>Para 2.33. This paragraph states that there is surplus hazardous waste landfill capacity in the West Midlands, but it does not outline where this is (specific sites) and how much capacity there is According to the EA's Hazardous WDI 2008 over 1,000 t of hazardous waste arising in Worcestershire was deposited in Gloucestershire in 2008. It should be noted that Gloucestershire currently has about 1.2 m³ of hazardous landfill void. The latest capacity figure given by Grondon Waste Management for their site at Wingmoor Farm East as of 31/03/2009 was 1,206,200 m³. But it should be noted that the future operational life of the Wingmoor Farm East site is currently being considered by the County Council (through Planning Permission Ref No: 09/0028/TWMAJW) and therefore Worcestershire should not rely on this landfill capacity being available.</p> <p>Therefore we consider that the First Draft Submission is lacking in a policy for Hazardous Waste. Gloucestershire County Council has raised on a number of previous occasions that hazardous waste has to be dealt with in the Waste Core Strategy. There should be self sufficiency for hazardous waste and this should be detailed as a policy within the Waste Core Strategy.'</p>	<p>Noted, change to be made</p> <p>Noted, change to be made in supporting text. We do not intend to set out an additional policy.</p>
WR29-719	<i>The Environment</i>	We previously made comment that no further	We will meet with the Environment Agency to

Reference	Name/Organisation	Summary of comments	Initial officer response
	Agency	<p>sites were planned in the county to cater with hazardous waste. We reiterate the below:</p> <p><i>“...No additional sites are planned in the county for treating hazardous waste and there appears to have been no recognition of the need for treatment of residual hazardous waste. Hazardous waste is highly variable in nature and therefore requires often quite specific forms of treatment. Although there is sufficient transfer capacity within the county there is no additional treatment provision proposed. It is not clear how much of the hazardous waste produced within the county is exported out for treatment and whether this has been assessed as part of the WCS.</i></p> <p><i>We would have expected the issue of hazardous waste to have been given greater consideration in the consultation, especially given the varied kinds of hazardous waste e.g. clinical waste, hazardous industrial waste, hazardous waste from domestic sources that are produced at civic amenity sites. For example, hazardous waste has not been considered in terms of land needed for processing and treatment in the county.</i></p> <p><i>The emerging preferred option for managing hazardous waste is to maintain the existing situation, where transfer provision will be made but without any form of treatment within the county. We suggest that the management of the</i></p>	discuss these issues and change to be made to reflect these points.

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p><i>county's hazardous waste, as far as practicable, within the county is a more sustainable solution than the transport costs and carbon footprint of exporting it out of the county.</i></p> <p><i>In addition, the impact of legislation such as the Batteries Directive is likely to increase the quantities of hazardous waste that is being produced within the county over the period of the strategy. A re-examination of the scale and types of hazardous wastes that are produced within the county and the optimum management solution is therefore recommended.</i></p> <p><i>The re-assessment should also look at where these waste streams are ultimately disposed of or recovered (this is almost certainly likely to be outside of the county) and should consider the "waste miles involved" in the transport of these wastes to their respective disposal points. The result of such an assessment could identify a very real need for treatment capacity to be provided within the county."</i></p> <p>We would welcome clarification on the above to assist in the soundness of the document.</p>	
Other comments			
PQ12-549	<i>Childswickham Parish Council</i>	Reliant on information as provided.	Noted. Background documents have been prepared to provide as much information as possible. These are available on our website www.worcestershire.gov.uk/wcs .
OR6-800	<i>Herefordshire & Worcestershire Earth</i>	Not in a position to comment	Noted.

Reference	Name/Organisation	Summary of comments	Initial officer response
	<i>Heritage Trust</i>		
PQ19-601	<i>Kempsey Parish Council</i>	No means of independently verifying the figures	Noted. Background documents have been prepared to provide as much information as possible. These are available on our website www.worcestershire.gov.uk/wcs .
PQ20-502	<i>Pencroft Ltd</i>	These figures of Tonnes per equivalent land area must be purely academic or statistical and can't be based on actual throughput of existing facilities. How can the whole thrust of the land requirement be based on purely theoretical figures.	The calculations are based on assessments of actual throughput of facilities in Worcestershire and government advice on average throughputs nationally, and are set out in the background document " <i>Arisings and capacity</i> ", available on our website www.worcestershire.gov.uk/wcs .
WR8-672	<i>White Ladies Aston Parish Council</i>	It would appear that Worcestershire is still not aware of the true information as to waste arisings and the categories of waste. (page 5 note 12). Having been involved with waste matters now since 1997 and attending various waste liaison meetings both at County Hall and Lower Moor it does seem that there is still a considerable amount of information lacking from the figures you are presenting for consultation. In fact, in the past the writer remembers that this very fact was raised several times at these meetings.	Agreed. The Strategy is based on the best available data and Defra is reviewing this.
WR14-682	<i>Redditch Borough Council</i>	As you will be aware with the Regional Spatial Strategies have been revoked it is now for local authorities to decide the most appropriate housing figure for their area. Page 17 appears to continue to put forward the figure stipulated in the emerging RSS however the housing figure for Redditch has not yet been decided. The alterations to these figures may have implications for the waste Core Strategy, in particular when projecting the need for future waste facilities in the County. We are happy to meet at a later date to	Noted. We are seeking advice on how best to address future housing figures and will include a system to review these figures as Core Strategies are developed and adopted.

Reference	Name/Organisation	Summary of comments	Initial officer response
		discuss this if you would like once the Revised Preferred Draft Core Strategy is out to public consultation (Mid December).	
WR15-695	<i>Gloucestershire County Council</i>	In terms of capacity we would like to note that it needs to clearly demonstrate the capacity gap for each waste stream.	Noted and agreed in principle. In particular, change to be made to evidence base and supporting text to clarify that there is a capacity gap in Worcestershire for the treatment of hazardous waste. The status and scale of existing landfill capacity in Worcestershire permitted to accept hazardous waste will also be clarified to demonstrate that sufficient capacity.
PQ23-626	<i>Norton-juxta-Kempsey Parish Council</i>	The table refers to "all streams" but in paragraph 1.11 there are certain streams for which no capacity gap exists; have they been excluded? Has import (1.12) and export (1.13) been included or excluded. The table should make this clear.	Change to be made to clarify.
OR14-ANON2	<i>Anonymous</i>	The figures are not believable. They appear to assume that current principles remain. What SHOULD be happening is that by proper effort on behalf of the CC that these figures are reducing not increasing. If more effort is put into the top end of the waste hierarchy by WCC then the gap at the bottom end of the hierarchy will significantly reduce.	The limitations of the data have been acknowledged throughout the development of the Waste Core Strategy. It is based on the best available information and full details of the assumptions behind the calculations are set out in the background document " <i>Arising and capacity</i> ", available on our website www.worcestershire.gov.uk/wcs . The strategy is to encourage waste to be managed at the highest appropriate level of the waste hierarchy, however the capacity gap which must be addressed to allow this must still be calculated on the data which is currently available.
PQ30-1649	<i>EM Jones</i>	Due to limitations in your data no confidence can be given to this. With more intelligent use of reducing reusing and for better recycling far better	The limitations of the data have been acknowledged throughout the development of the Waste Core Strategy. It is based on the

Reference	Name/Organisation	Summary of comments	Initial officer response
		figures could/should be achieved.	best available information from the Environment Agency. Defra has been developing improved data collection for some years and we will use this if it becomes available.
PQ31-642	<i>Rushock Parish Council</i>	Not in the medium term as the culture of packaging and composting may change the volumes (also use of local products)	The limitations of the data have been acknowledged throughout the development of the Waste Core Strategy. It is based on the best available information from the Environment Agency. Defra has been developing improved data collection for some years and we will use this if it becomes available.
PQ36-688	<i>Herefordshire and Worcestershire Joint Waste Resource Management Forum</i>	<p>We do not agree with the treatment of Materials Recovery Facilities (MRFs) within the background document "Arising and Capacity", September 2010 which places them within the same category as transfer stations. Much of the output from MRFs is in a form ready for reprocessing/ manufacture and as such it is our view that MRFs should be included within the category "Physical treatment, Thermal treatment and recovery". The effect of this would be to reduce by at least 105,00 tonnes per annum the currently stated over capacity for transfer and to close the capacity gaps for treatment by a corresponding amount.</p> <p>Whilst this would still show no capacity gap for transfer according to your figures we would point out that this analysis is of limited value given the role that transfer plays within the overall waste management chain and that transfer facilities need to be appropriately located and fit for</p>	<p>Noted, advice will be sought from the Environment Agency.</p> <p>There is currently no intention to remove this caveat.</p>

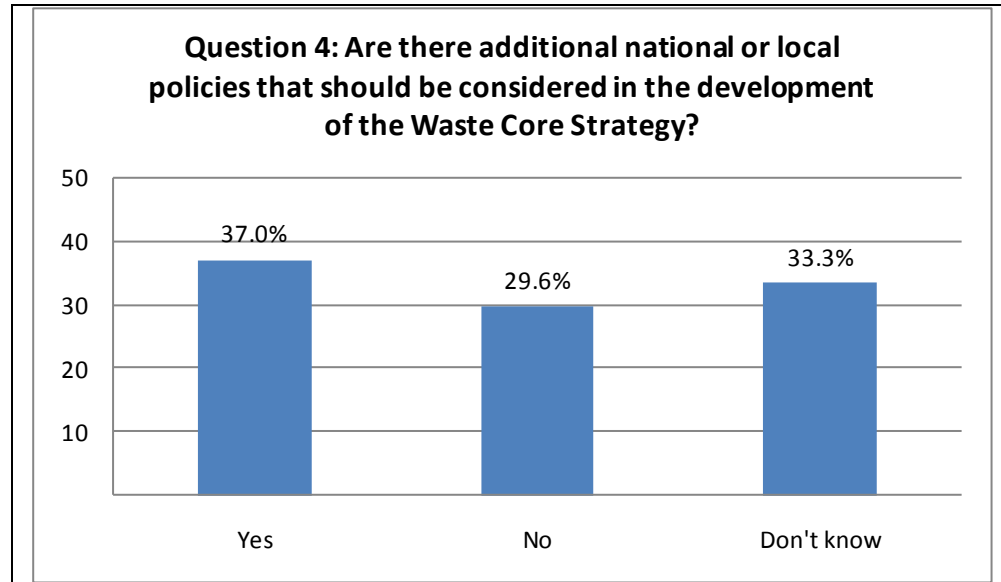
Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>purpose. The crude tonnage assessment does not reflect these factors and that consequently transfer capacity in some locations and for some purposes may be or become inadequate. For this reason we would still wish to see the caveat remain that levels stated are minima and that this should not preclude planning permission to meet identified local need.</p> <p>It is unclear from your figures if the evaluation of Household Recycling Centre (HRC) capacity takes account of future growth in household numbers. Present proposed growth in household numbers will impact on the capacity of some current HRCs and if not addressed in the present analysis express provision should be made for this as part of the annual WCS review.</p> <p>Paragraph 2.35 Waste Water Treatment increased capacity – suggest it may be helpful to refer to the Water Cycle Strategies (produced for Worcestershire authorities as part of their LDF Evidence Base), for further information.</p> <p>It is noted that future population and employment growth forecasts are based on revoked Regional Spatial Strategy targets.</p>	<p>We have taken into account the requirements identified in the revised Joint Municipal Waste Management Strategy which gives consideration to future growth in household numbers. Waste Management officer comment on the likely need for replacement, upgrading and improvements to at least 5 Household Recycling Centres have also been taken into account. These have been included in calculations of MSW capacity.</p> <p>Noted. These have been taken into account in the background document "<i>Waste Water Treatment Infrastructure</i>".</p> <p>This will be considered further when the status of the RSS is clarified.</p>
PQ38-1679	<i>Axis (on behalf of Mercia Waste Management)</i>	It is simply not possible to understand how the capacity gap has been calculated.	Full details of how the capacity gap has been calculated and the assumptions it is based on are given in the background document " <i>Arising and capacity</i> ", available on our

Reference	Name/Organisation	Summary of comments	Initial officer response
			website www.worcestershire.gov.uk/wcs .
PQ39-517	<i>Alvechurch Parish Council</i>	Amount of waste may currently be growing but technology innovations and recycling improvements ought to counteract this growth.	The strategy is to encourage waste to be managed at the highest appropriate level of the waste hierarchy. The capacity gap which must be addressed must be calculated on the data which is currently available.
PQ40-610	<i>Lindridge Parish Council</i>	Clearly depends on the robustness of underlying assumptions	Agreed. Full details of how the capacity gap has been calculated and the assumptions it is based on are given in the background document "Arising and capacity", available on our website www.worcestershire.gov.uk/wcs . The limitations of the data have been acknowledged throughout the development of the Waste Core Strategy. It is based on the best available information from the Environment Agency. Defra has been developing improved data collection for some years and we will use this if it becomes available.
PQ42-717 (L)	<i>Natural England</i>	This question is beyond our remit. However, we are pleased to note that the RSS background/technical papers have been used in the evidence base.	Support noted.

Question 4: Are there additional national or local policies that should be considered in the development of the Waste Core Strategy?

	Yes	No	Unsure/ Don't Know
Are there additional national or local policies that should be considered in the development of the Waste Core Strategy?	20	16	18

Base: 54 respondents



Reference	Name/ Organisation	Summary of comments	Initial officer response
PQ3 – 389	<i>Haldex Brake Products Ltd, Redditch</i>	Should this ask 'if yes'?	Agreed. Typing error.
PQ7-1551	<i>Spar Convenience Stores, Redditch</i>	All considered (question worded wrongly)	
PQ17-620	<i>Martley Parish Council</i>		

Reference	Name/ Organisation	Summary of comments	Initial officer response
PQ39-517	<i>Alvechurch Parish Council</i>		
OR2-701	<i>Staffordshire County Council</i>	Although the Secretary of State has announced the abolition of Regional Spatial Strategies the technical work underpinning the policies in the submitted RSS and the comments of the Panel which examined the draft RSS policies can and should be taken into account.	Agreed. The evidence upon which the West Midlands Regional Spatial Strategy and Phase 2 revision were based has been considered in the development of the Waste Core Strategy. However, as the status of the RSS is unclear it has not been included in the figure for 'Relevant plans and policies'.
PQ12-549	<i>Childswickham Parish Council</i>	How to control waste inputs from outside the survey area - is there a system of permits? Regional policy?	Due to economies of scale and the specialised treatment methods for some forms of waste it is inevitable that some wastes will be imported and exported into, out of and across the county. The strategy will however seek to minimise this and will be based upon achieving equivalent self-sufficiency in waste management capacity. A system of permits would be outside the remit of the Waste Core Strategy.
OR5-1707	<i>Mr Brett</i>	In determining strategy, full account should be taken of the EU Commission President's 10 year plan for Green Growth and the change in policies that will arise from this, in particular the formation of a climate action Commissioner and Directorate General.	This plan will be considered, and relevant changes will be made.
OR6-800	<i>Herefordshire & Worcestershire Earth Heritage Trust</i>	Even though they may not be statutory policies, but consideration of the county Biodiversity and Geodiversity Action Plans would be welcomed, in terms of delivering conservation objectives and management at any site that may be developed as a result of the Strategy.	These will be added to the list of local plans and policies. Reference is already made in Policy WCS 2.
OR12-1668	<i>Mr Dowty</i>	Get all the districts within Worcestershire to operate to the same standards as Wychavon, rather than every district doing their own thing. All	The Joint Municipal Waste Management Strategy sets out an approach agreed by all the 8 councils in Herefordshire and Worcestershire for the

Reference	Name/ Organisation	Summary of comments	Initial officer response
		councils need to have a consistent approach to food recycling and should also have a national policy on commercial and industrial waste, much of which is the same composition of municipal solid waste.	collection and management of municipal solid waste, within which district councils are responsible for their own collection systems.
PQ18-618	<i>Malvern Wells Parish Council</i>	Environment Agency Aquifer Protection Policy	Noted.
WR13-1715	<i>Nuclear Legacy Advisory Forum (NuLeAF)</i>	<p>I want to draw your attention to NuLeAF's latest Briefing Paper on LLW management (on the NuLeAF website at BP19) which provides a high level commentary on the final version of NDA LLW Strategy and points to some implications for planners, including potential specific policies on radwaste management.</p> <p>The Briefing Paper also refers to the Public Inquiry currently taking place into an appeal against refusal to dispose of LLW to landfill in Northants. One of the issues being examined at the inquiry is conformity of the application with Northants CC plans (which do not contain any specific policies on radioactive waste management). The link to inquiry documentation is provided in the Briefing.</p>	Noted. Briefing paper to be reviewed and changes will be made as relevant.
PQ24(also WR9) - 1645	<i>Mrs L Brookes</i>	Government code of practice on consultation Aarhus Convention, POPs treaty, Stockholm Convention. Human Rights Act.	These have been considered in the preparation of the Strategy.
WR23-862	<i>Centro</i>	Centro considers that all plans within the wider West Midlands area should demonstrate that full consideration has been given to sustainable transport opportunities available and be in conformity with regional and national guidance.	Noted.

Reference	Name/ Organisation	Summary of comments	Initial officer response
PQ6-188	<i>M&M Timber Co. Ltd, Kidderminster</i>	no further documents to include	Noted.
OR14-ANON2	<i>Anonymous</i>	There are key policies which involve improving environmental issues and sustainability as well as achieving better long term economical factors, which should have a GREATER weighting or priority than others. These are such as the waste heirarchy and minimising road haulage. Unfortunately WCC do not abide by these policies. What is important is that these policies which are keys to a sustainable and environmentally beneficial plan are not subsumed by political issues and preferences and by the inability and/or incompetence within WCC to progress with their plans. Consultation with Parish councils and abiding by Parish Plans should also have substantial consideration and not to ride roughshod over the wishes of local people.	The objectives in the Waste Core Strategy cover environmental and economic issues and are not listed in order of priority. Public consultation has informed the development of the Waste Core Strategy throughout (see Consultation Response documents available on our website www.worcestershire.gov.uk/wcs). Once adopted, the Waste Core Strategy will provide the framework against which planning applications will be assessed.
WR25-4	<i>Network Rail</i>	I enclose a link to Network Rail's website: http://www.networkrail.co.uk/browseDirectory.aspx?dir=\RUS%20Documents&pageid=2895&root= This link provides access to Network Rail's Great Western Route Utilisation Strategy (RUS) (March 2010) which sets out the strategic vision for the future of the railway in this vital part of the railway network. It is hoped that this will be of use to the Council and keep you up to date with future aspirations for railway developments within you plan area and wider a field. This may well influence this and future planning policy documents.	Noted, this document will be reviewed and any relevant changes will be made.

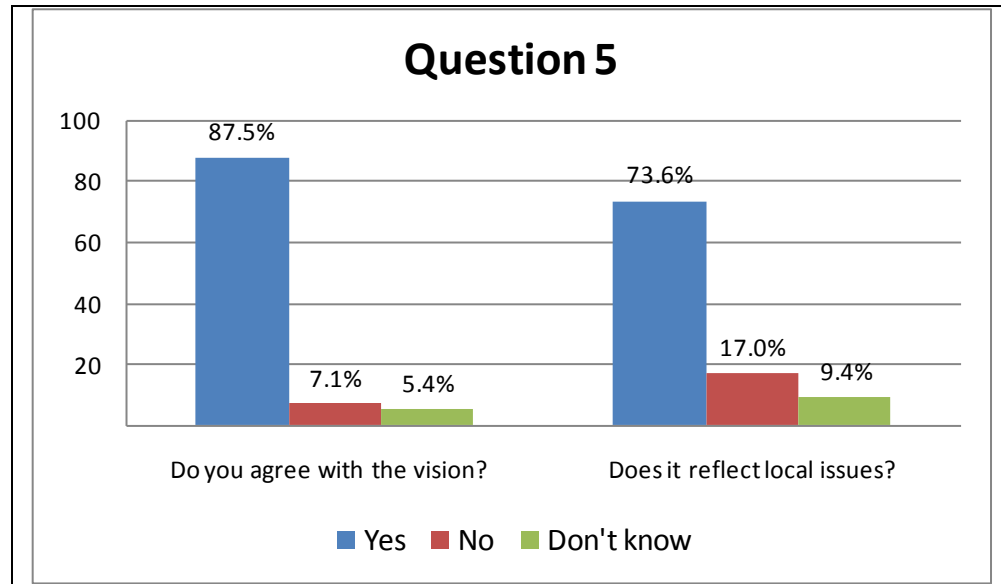
Reference	Name/ Organisation	Summary of comments	Initial officer response
PQ30-1649	<i>EM Jones</i>	<p>(Ticked no) What is the council's proposed VALIDATION DOCUMENT? (which is yet to be adopted).</p> <p>(Ticked yes) Also the waste hierarchy is correct as is the need to protect HUMAN HEALTH & AMENITY. New technologies have and will emerge which will be less damaging to human health and the environment so we must not be tied to one particular strategy.</p>	<p>The proposed Validation Document will provide applicants and their agents with guidance on the information required when submitting a planning application which will enable us, the County Planning Authority, to accept and validate applications more quickly, thereby reducing delays that would otherwise occur in the processing of applications. This is part of a Government initiative to improve the efficiency and effectiveness of the planning system.</p> <p>The Waste Core Strategy is not technology specific. It provides a policy framework to assess any applications, including for any new technologies, as they come forward. The need to protect the health and amenity of local people is specifically referred to in objective WO2.</p>
PQ31-642	<i>Rushock Parish Council</i>	Such as transition activity relating to food, energy etc.	Transition initiatives vary significantly in their scope and implementation. To support the aims of these initiatives we have taken into account the Sustainable Community Strategies of Worcestershire.
PQ32-internal	<i>Worcestershire County Council Economic Development</i>	(answer yes) Full consideration to local and national economic policy. Need to take account of security and supply issues in considering EfW.	<p>All applications will be determined in accordance with national policy.</p> <p>PPS22 states that "The wider environmental and economic benefits of all proposals for renewable energy projects, whatever their scale, are material considerations that should be given significant weight in determining whether proposals should be granted planning permission."</p>
PQ36-688	<i>Herefordshire and Worcestershire</i>	DEFRA is currently undertaking a review of national waste policies for England. It is planned to report on this review in Spring 2011. The outcome	Noted, reference to be made in the Strategy to the proposed review of national waste policy.

Reference	Name/ Organisation	Summary of comments	Initial officer response
	<i>Joint Waste Resource Management Forum</i>	<p>of this review may impact on the WCS and on this basis we recommend a comment be included in 2.44 to this effect. A copy of the Joint Waste resource Management Forum's statement of evidence to the review is enclosed for information as this may be of assistance to you.</p> <p>Amend Figure 7 to read "District Council's Development Plan Documents rather than Core Strategies (please note South Worcestershire Joint Core Strategy is now the South Worcestershire Development Plan). Consider including a reference to the Local Enterprise Partnerships.</p>	Noted, change to be made.
PQ37-1622	<i>Worcester City Council</i>	Saved Local Plan policies.	Noted, change to be made.
PQ38-1679	<i>Axis (on behalf of Mercia Waste Management)</i>	The UK Renewable Energy Strategy should be added.	The UK Renewable Energy Strategy has been considered in the background documents " <i>Recovering Energy From Waste: Thermal And Biological Treatment Technologies</i> " and " <i>Resource Recovery from Biodegradable Waste: Composting and Anaerobic Digestion</i> ".
PQ42-717 (L)	<i>Natural England</i>	<p>The Malvern Hills AONB and the Cotswolds AONB Management Plans should also be considered in the development of the Waste Core Strategy to ensure that no policy conflict arises.</p> <p>Green Infrastructure Strategies should also be added.</p>	<p>Agreed, these policies have been considered.</p> <p>The Green Infrastructure Strategy for Worcestershire is still being prepared. However, reference is made to this concept elsewhere in the Strategy.</p>
OR16-547	<i>Chaddesley Corbett Parish Council</i>	Chaddesley Corbett Parish Council has developed and adopted a Parish Plan and Parish Design Statement; other Parishes may have done so too.	Reference to Parish Plans will be added.

Question 5: Do you agree with the vision and does it reflect local issues?

	Yes	No	Unsure/ Don't Know
Do you agree with the vision?	49	4	3
Does it reflect local issues?	39	9	5

Base: All valid responses



Reference	Name/ Organisation	Summary of comments	Initial officer response
PQ6-188	<i>M&M Timber Co. Ltd, Kidderminster</i>	Both Worcester, Malvern and Hartlebury - Droitwich and Redditch are on railway lines why is there no mention of using other forms of transport? It is unrealistic to believe that Worcestershire can function in isolation being so close to the West Midlands conurbation and providing employees in that area.	The vision states: "facilities will be located where they minimise the need to remove waste by road", transport by other methods is mentioned in paragraph vi of the vision. The geographic hierarchy was informed by the consideration of water and rail transport links and detail of this will be included. The section "Setting the context" considers imports and exports of waste, including to and from the West Midlands conurbation. Paragraph ix of the Vision considers waste as part of a symbiotic network of activities within the West Midlands.
PQ7-1551	<i>Spar Convenience Stores, Redditch</i>	Residents need to be kept informed.	Agreed. The Council will continue to publicise future consultations in relation to the Waste Core Strategy. All planning 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.
OR4-680	<i>Bromsgrove District Council</i>	Agree that vision sums up adequately the intention of the waste core strategy, however the supporting text could be more specific to Worcestershire itself, as it appears to be somewhat generic in nature.	Noted.
OR12-1668	<i>Mr Dowty</i>	There are far better cheaper alternatives of dealing with waste now. Why wait so long? With recycling on the increase all of the time, why can't Worcs CC wake up and realise the potential worth of a lot of the recyclates created and sell them and make some much needed money now, rather than giving money	The Joint Municipal Waste Management Strategy sets out an approach agreed by all the 8 councils in Herefordshire and Worcestershire for the collection and management of municipal solid waste. It aims to increase recycling and meet government targets.

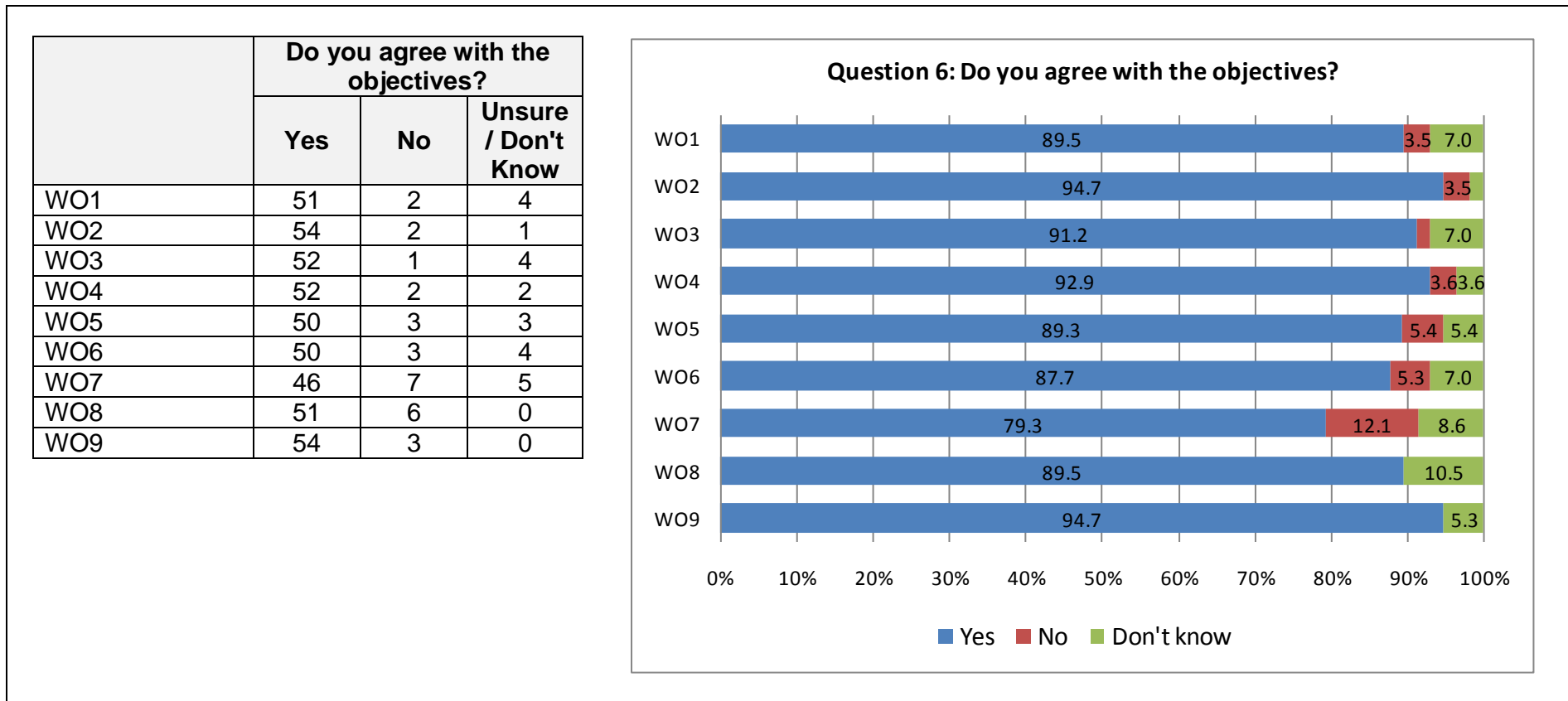
		straight to its waste operator.	
PQ24(also WR9) - 1645	<i>Mrs L Brookes</i>	Please don't say one thing and do another. Incineration will increase, not decrease traffic. See WO2, local populations health disregarded re incinerator. WO2 what about communities in Herefordshire.	The Waste Core Strategy is not technology specific and does not propose incineration, although it does provide a policy framework to assess any applications as they come forward. The need to protect the health of local people is specifically referred to in objective WO2.
OR14-ANON2	<i>Anonymous</i>	No reference to Parish Plans, which are a key element to how people see there immediate local environment and its future. Also, there needs to be something to say that there will not be any detrimental effects on people and communities.	Reference to Parish Plans will be added.
WR23-862	<i>Centro</i>	Although this covers an area outside of the Centro area, Centro welcomes in principle that the Core Strategy aims for "Waste production in Worcestershire to be minimised and what is produced will be regarded as a source of useful material to be reused"	Support noted.
WR24-588	<i>Hartlebury Parish Council</i>	The individual issues raised in the strategy are complex and the Council does not feel able to respond to each question on the supplied questionnaire. We are, however, in complete agreement that waste minimisation, rather than waste disposal, must be Worcestershire's top priority. If the county can reduce the amount of waste produced and increase recycling rates this must be the way forward. We would very much like to see policies put in place for achieving this.	Support noted.
WR29-719	<i>The Environment Agency</i>	Further to our previous comments we support the revised wording of the Strategy's Vision; in that the value of waste will be regarded as a source of useful material to be reused. Whilst this is a step in the right direction we feel that the importance of waste as a resource could be further emphasised. Furthermore, in the vision no mention of "Prevention" of waste production in accordance with the waste hierarchy	We will further consider how the concept of waste prevention can be included in the Waste Core Strategy and make references to the Waste Hierarchy stronger.

		and the ethos of PPS10 is made. We think that the vision can be made much stronger by including "Prevention" and without doing so could serve to question its robustness. This is a theme that crosscuts the document and we feel that stronger adherence to the waste hierarchy would strengthen the strategy.	
WR30-716	<i>English Heritage</i>	We welcome the broad reference in the Vision to the County's distinctive environmental, social and cultural assets, and to the prominence given to the design of facilities reflecting local characteristics.	Support noted.
WR32-1624	<i>Wyre Forest District Council</i>	WFDC are supportive of the vision outlined within the consultation document.	Support noted.
PQ27-1598	<i>Elgar Foods Ltd</i>	Should also be designed to have minimum impact on local communities and businesses	The vision aims to develop a waste management industry which serves the needs of local communities and the local economy. Policy WCS4 seeks to manage the impact on surrounding uses.
PQ30-1649	<i>EM Jones</i>	To enhance Worcestershire's countryside is necessary and commendable but can't be possible if we only obey the council's waste contractor's dictate. You state 'there will be very little material that cannot be reused or recycled' so incineration must be totally disregarded. The thousands of tonnes of toxic ash is still to be landfilled storing problems for future generations.	The County Council is responsible for the disposal of Municipal Solid Waste. Other waste streams are dealt with through normal operations of the private sector market. The Waste Core Strategy is not technology specific and does not propose incineration, although it does provide a policy framework to assess any applications as they come forward.
PQ36-688	<i>Herefordshire and Worcestershire Joint Waste Resource Management Forum</i>	3.8 ix - we feel the network described should be cast wider to at least a national, if not international level reflecting the nature of the waste industry and that some reprocessing facilities are highly specialised and will remain in their present geographic locations. Para 3.9 – seeks to balance the County's assets against the need to reduce waste miles (unsustainable waste transportation). However, it is consider that greater emphasis should be given to	The strategy is based on the concept of equivalent self-sufficiency but recognises that some facilities may be specialised serving a greater than local need. Noted. A spatial strategy will be developed to direct waste management facilities to the focus of waste arisings with the intention of achieving this element of the vision. However, this is only

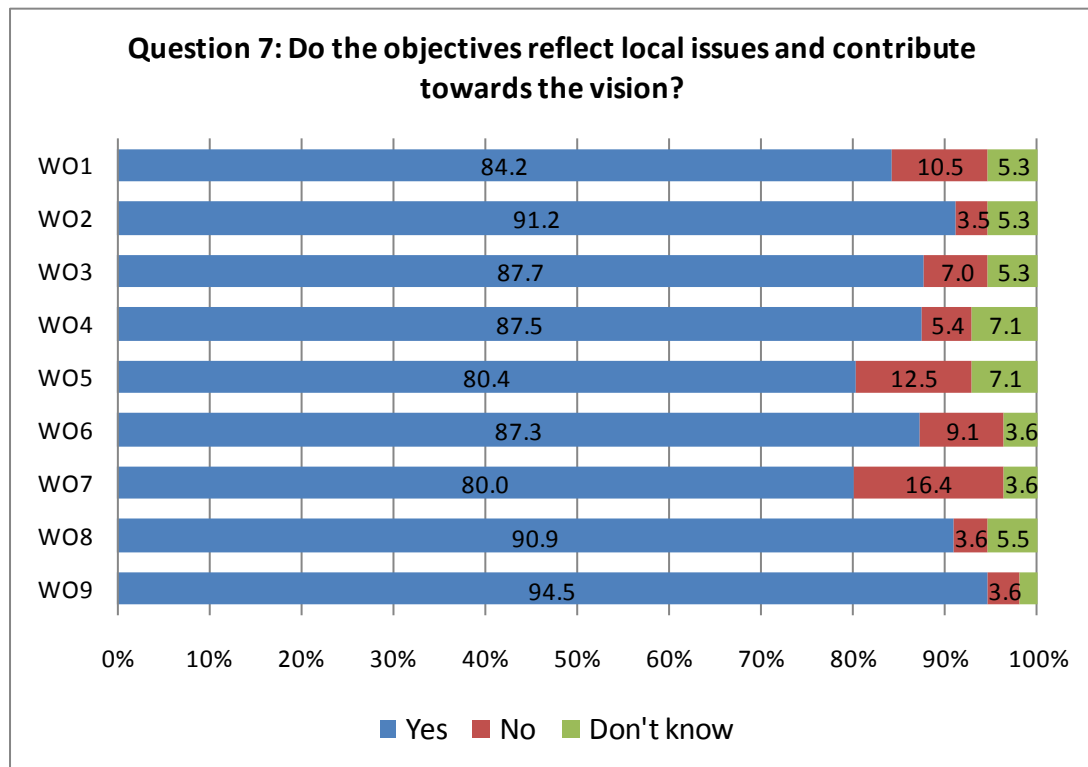
		<p>this process and whilst these considerations are reflected in the proposed objectives, the supporting text should make clear that whilst reducing waste miles will be a major consideration it can not be an overriding consideration.</p>	<p>one consideration.</p>
PQ37-1622	<i>Worcester City Council</i>	<p>Take out the word Worcestershire and you could be anywhere! Is there any opportunity to tie in with some of the unique features in Worcestershire could make it more locally distinctive. No mention of possibility for utilising for heat and power.</p>	<p>Noted. Vision to be revised to reflect the characteristics of Worcestershire.</p>
PQ38-1679	<i>Axis (on behalf of Mercia Waste Management)</i>	<p>Reference to minimising road transport is inconsistent with paragraphs 2.13 – 2.16 of the emerging Waste Core Strategy (WCS), Thus this should be deleted and replaced with 'whilst there are limited opportunities to effectively transport by non-road means, this should remain an aspiration. Where waste is transported by road waste management facilities should be well served by the primary road network and use routes of a suitable standard and where possible be situated close to arisings. As a general point, there seems to be some inconsistency throughout the document on the approach the Council are seeking to take to minimising road transport.</p>	<p>Paragraphs 2.13-2.16 set out the context of the county as it is at present. The strategy seeks to minimise the distance waste is transported by road through considered location as well as the use of alternative means of transport, as stated in point vi of the vision.</p>
PQ42-717 (L)	<i>Natural England</i>	<p>Natural England believes that the vision is good. It is clearly aspirational and takes into account the principles of sustainable development. We particularly commend the emphasis placed on not compromising Worcestershire's environmental, social and cultural assets.</p> <p>In the supporting text (para 3.8i) we note that medium term goals have been set in order to make Worcestershire a zero waste county. This reflects our comments on the emerging waste strategy (February 2010).</p>	<p>Support noted.</p> <p>Support noted.</p>

		Yes [it reflects local issues] as much as it can in a short paragraph.	Support noted.
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Question 6 and 7: Do you agree with the objectives and do they reflect local issues and contribute towards the vision?



	Do they reflect local issues and contribute towards the vision?		
	Yes	No	Unsure / Don't Know
WO1	48	6	3
WO2	52	2	3
WO3	50	4	3
WO4	50	3	4
WO5	46	7	4
WO6	48	5	2
WO7	45	9	2
WO8	50	2	3
WO9	52	2	1



Do you agree with the objectives?

Reference	Name/Organisation	Summary of comments	Initial officer response
WO1			
To base our decisions on the principles of sustainable development and the need to reduce greenhouse gas emissions and to mitigate climate change			
PQ24(also WR9) - 1645	Mrs L Brookes	(Answer Yes and Don't know) So why think of building an incinerator. What tonnage per annum are the carbon emissions from one?	The Waste Core Strategy is not technology specific and does not propose an incinerator. Individual facilities will produce different levels

Reference	Name/Organisation	Summary of comments	Initial officer response
			of emissions.
OR14-ANON2	<i>Anonymous</i>	The principles of sustainability, climate change etc seem to be based on a one-sided view that further waste management facilities are better for the environment. This is not always the case - they can have a higher carbon footprint and therefore be MORE DAMAGING to the environment.	European and national policy are based on the principles of the waste hierarchy. The Waste Core Strategy must comply with this. The strategy will make provision for treatment and management facilities, which in most cases are better for the environment than disposal to landfill.
PQ30-1649	<i>EM Jones</i>	Incineration does not reduce greenhouse gas emissions or protect the environment, natural resources, character and amenity or health and wellbeing of the local people.	The Waste Core Strategy is not technology specific and does not propose incineration, although it will provide a policy framework against which applications will be assessed.
WO2			
To protect and enhance the county's natural resources, environmental, social, cultural and economic assets, the character and amenity of the local area and the health and wellbeing of the local people			
PQ20-502	<i>Pencroft Ltd</i>	Explain further why Worcestershire has to take so much of Herefordshire's waste.	The Joint Municipal Waste Management Strategy sets out an approach agreed by all the 8 councils in Herefordshire and Worcestershire for the collection and management of municipal solid waste, within which district councils are responsible for their own collection systems.
PQ24(also WR9) - 1645	<i>Mrs L Brookes</i>	So don't burn them.	The Waste Core Strategy is not technology specific and does not propose an incinerator. It promotes the management of waste at the highest appropriate level of the waste hierarchy.
PQ30-1649	<i>EM Jones</i>	We must protect our environment, the character and amenity of the local area and the health and wellbeing of the local people.	Support noted.
WO3			
To do everything possible to minimise waste production and make driving waste up the waste hierarchy the basis for waste management in Worcestershire			

Reference	Name/Organisation	Summary of comments	Initial officer response
PQ6-188	<i>M&M Timber Co. Ltd, Kidderminster</i>	Priority	Agreed. The objectives set out the priorities for the Waste Core Strategy.
OR2-701	<i>Staffordshire County Council</i>	"To do everything" can be an unduly onerous and sometimes impractical or uneconomic option. The phrase "To take all reasonable measures" would be a more realistic objective which would be capable of being substantiated as proportionate and justifiable.	Agreed, change to be made.
WR16-678	<i>Harvington Parish Council</i>	The only comment they wish to make is regarding objective WO3 on the summary document which they feel is not made clear.	Noted, change to be made.
PQ24(also WR9) - 1645	<i>Mrs L Brookes</i>	Will you do this though.	Policies WCS 2, 5 and 6 specifically address this issue.
PQ30-1649	<i>EM Jones</i>	We can and must do more to implement WO3.	Noted, the Waste Core Strategy aims to achieve this objective.
PQ37-1622	<i>Worcester City Council</i>	Can you ever 'do everything possible'? Why not delete these words leaving the objective as 'to minimise waste production'.	Agreed, change to be made.
WO4			
To ensure that the waste implications of all new development in Worcestershire are taken into account			
PQ24(also WR9) - 1645	<i>Mrs L Brookes</i>	<i>(Answer Yes and Don't know):</i> More clarity needed on actual waste figure arisings.	The Strategy is based on the best available information from the Environment Agency. Defra has been developing improved data collection for some years, we will use this if it becomes available.
PQ30-1649	<i>EM Jones</i>	Do more to ensure waste implications are taken into account.	Noted, the Waste Core Strategy aims to achieve this objective.
PQ39-517	<i>Alvechurch Parish Council</i>	<i>(Answer yes)</i> but add the rider "taken into account before that development is implemented".	Noted, the Waste Core Strategy aims to achieve this objective.
WO5			
To address the "Capacity Gap" between how much waste management capacity we have and what we need over the plan period to 2027			

Reference	Name/Organisation	Summary of comments	Initial officer response
PQ4-337	<i>Ashland UK Ltd, Kidderminster</i>	"Capacity gaps" should be considered at a national level rather than local.	The Waste Strategy for England 2007 sets a broad context but it is government policy that capacity gaps should be considered at a local level. This contributes towards the concept of "equivalent self-sufficiency" as set out in the Vision.
PQ6-188	<i>M&M Timber Co. Ltd, Kidderminster</i>	ASAP	Objective WO5 addresses the capacity gap over the plan period.
PQ24(also WR9) - 1645	<i>Mrs L Brookes</i>	<i>(No answer):</i> With increased recycling this will fall dramatically.	The need for recycling facilities forms part of the capacity gap. The strategy will enable new facilities to come forward and ensure that recycling is maximised.
OR14-ANON2	<i>Anonymous</i>	As stated previously, the "Capacity Gap" seems to be flawed.	Full details of how the capacity gap has been calculated and the assumptions it is based on are given in the background document "Arising and capacity", available on our website www.worcestershire.gov.uk/wcs . The limitations of the data have been acknowledged throughout the development of the Waste Core Strategy. It is based on the best available information from the Environment Agency. Defra has been developing improved data collection for some years and we will use this if it becomes available.
PQ30-1649	<i>EM Jones</i>	The 'capacity gap' will be reduced by more intelligent waste services. More recycling facilities such as LAWRENCE Recycling.	By identifying the capacity gap, the strategy will enable such facilities to come forward.
WO6			
To safeguard existing waste management facilities from incompatible development			
PQ23-626	<i>Norton-juxta-Kempsey Parish Council</i>	(No) and vice versa to safeguard existing communities from incompatible waste management facility developments.	Objective WO2 and policies WCS 2 and 4 are designed to ensure there is no unacceptable adverse impact on communities.
PQ24(also	<i>Mrs L Brookes</i>	<i>(Answer Yes and Don't know):</i> An incinerator	The Waste Core Strategy is not technology

Reference	Name/Organisation	Summary of comments	Initial officer response
WR9) - 1645		would be incompatible as it would burn everything = increased greenhouse gases.	specific and does not propose an incinerator. Objective WO6 is to safeguard existing waste management facilities from incompatible development.
PQ30-1649	<i>EM Jones</i>	I agree with safeguarding waste management facilities from incompatible development.	Support noted.
WO7			
To reduce waste miles by road			
PQ4-337	<i>Ashland UK Ltd, Kidderminster</i>	Environmental impact by road may be favourable if location of final waste disposal is best option.	Agreed, but consideration of location can help to reduce the number of waste miles by road.
PQ6-188	<i>M&M Timber Co. Ltd, Kidderminster</i>	Why by Road only?	The objective is to reduce waste miles by road, this will be achieved by encouraging multi-modal transport methods, including rail and water, and encouraging development in areas which minimise the need to transport waste.
PQ10-1712	<i>Mr P Bladon</i>	Distances in official reports like this should be expressed in kilometres.	Noted but reducing 'waste miles' is a conventional term used to indicate a decrease in the distance waste is transported.
PQ12-549	<i>Childswickham Parish Council</i>	Waste Transfer Stations need to be more frequently distributed.	Noted and agreed.
PQ19-601	<i>Kempsey Parish Council</i>	If this implies more waste treatment centres more consultation needed.	The First Draft Submission consultation included details of the waste management capacity needed and identified <i>areas of search</i> . People have been able to make comments on these locations as part of this consultation and will have the opportunity to comment on individual planning applications as they are brought forward.
PQ20-502	<i>Pencroft Ltd</i>	The Herefordshire subject again!!	Noted. Please see response to your comment above.

Reference	Name/Organisation	Summary of comments	Initial officer response
PQ23-626	<i>Norton-juxta-Kempsey Parish Council</i>	(No) delete all "where possible" otherwise it waters down the Vision dramatically	Noted, change to be made.
PQ24(also WR9) - 1645	<i>Mrs L Brookes</i>	(Answer Yes and Don't know): Localised AD facilities Herefordshire to treat own waste.	The Waste Core Strategy only applies to proposals for facilities in Worcestershire and is not technology specific.
WR23-862	<i>Centro</i>	Strategic objective 7: "to reduce waste miles by road where possible" is welcomed. Full consideration should be given to the use of rail freight to transport waste, as helps to reduce road congestion and carbon emissions. Centro feels that rail freight connections to waste sites can in general provide more sustainable option than road connected sites. This will help to reduce the impact on the wider transport network also.	Support noted. This will be considered within the context of Worcestershire.
PQ30-1649	<i>EM Jones</i>	Reduce waste miles by road certainly. The waste should be dealt with more than one, smaller more flexible units. Thereby reducing road miles.	Noted. The Waste Core Strategy makes provision for this.
PQ37-1622	<i>Worcester City Council</i>	(Answer yes) Assuming 'where possible' shown in the summary has been deleted as per main document.	Agreed, change to be made.
PQ38-1679	<i>Axis (on behalf of Mercia Waste Management)</i>	Add 'where practical'	This concept will be considered.
WO8			
To encourage communities in Worcestershire to take responsibility for their own waste and involve all those affected as openly and effectively as possible			
PQ6-188	<i>M&M Timber Co. Ltd, Kidderminster</i>	But reduce rates! Create incentives	This is outside the remit of the Waste Core Strategy.
PQ19-601	<i>Kempsey Parish Council</i>	Cost implication to local communities not known	Noted. Objective will be changed to clarify communities' role.
OR11-1586	<i>M V Kelly</i>	Involving everyone - depends on the level of involvement. As the time required in getting feedback/responses may hinder/inundate, with reference to "too many cooks spoiled the broth"	Community involvement has an important role to play in contributing towards sustainable development. Community views have shaped the development of the Waste Core Strategy

Reference	Name/Organisation	Summary of comments	Initial officer response
			and the community should be given the opportunity to influence any development proposals brought forward in accordance with Worcestershire's Statement of Community Involvement.
PQ30-1649	<i>EM Jones</i>	Communities should be encouraged to take responsibility for their own waste in their own county and their own area.	Support noted.
PQ37-1622	<i>Worcester City Council</i>	Remove 'as possible' to make it more positive.	Noted, change to be made.
OR16-547	<i>Chaddesley Corbett Parish Council</i>	There must be an 'economy of scale' factor that should guide decisions about what can be devolved/delegated to and managed at each tier of community and local authority. Alignment of funding with localisation of responsibilities will be a factor too.	The broad geographic hierarchy of settlements was developed to guide the types of development which may be appropriate in different levels of that hierarchy and this will be developed. Funding is beyond the remit of the Waste Core Strategy.
WO9			
To develop a waste management industry that contributes positively to the local economy			
PQ24(also WR9) - 1645	<i>Mrs L Brookes</i>	<i>(Answer Yes and Don't know):</i> You shouldn't have a monopoly. You should encourage smaller businesses. Look at how Lawrences in Kidderminster work. 70 jobs extra for recycling. No cost to the public.	The County Council is responsible for the disposals of municipal waste. This is done through a contract which does use some smaller businesses. Other waste streams are dealt with through normal operations of the private sector market. Lawrences in Kidderminster is one example of this.
PQ30-1649	<i>EM Jones</i>	An incinerator would only have a negative impact and not to be recommended/imposed on any one and would most certainly not contribute to a local economy.	The Waste Core Strategy is not technology specific and does not propose an incinerator. Any proposals will be assessed as they are brought forward.
PQ34-676	<i>Wolverley and Cookley Parish Council</i>	This should be a priority to develop waste management industry and energy generation from waste.	Noted. Change to be made to supporting text of policy WCS 2 to address this principle.

Reference	Name/Organisation	Summary of comments	Initial officer response
PQ39-517	<i>Alvechurch Parish Council</i>	Strongly agree with this one.	Support noted.
General comments			

Reference	Name/Organisation	Summary of comments	Initial officer response
OR5-1707	<i>Mr Brett</i>	<p>These objectives SHOULD be hierarchical and WO1 should be the primary objective.</p> <p>A further "value for money" objective should be inserted to emphasise the balance between meeting "green" objectives and paying minimum cost.</p> <p>WO5: Since information on the quantity of waste entering or leaving the county is so poor the significance of the capacity gap is not fully known.</p> <p>WO7: where possible is mealy mouthed and should be strengthened. Reference should also be made to other means of transport</p>	<p>Do not agree. All the objectives are important and will contribute to realising the Vision.</p> <p>Value for money will be a commercial concern for individual operators as they bring proposals forward. Objective WO9 is for waste management to contribute positively to the local economy.</p> <p>The full document contained more detail on imports and exports on a national and regional basis (pages 21 to 24) using data recommended by government. The strategy will be based upon achieving equivalent self-sufficiency in waste management capacity. Worcestershire's capacity gap is set out in more detail in the background document "<i>Arisings and capacity</i>", available on our website www.worcestershire.gov.uk/wcs. We will monitor changes in data and assess the need to revise the strategy accordingly.</p> <p>Printing error, "where possible" remained in the Summary Document but was removed from the main document. The objective is to reduce waste miles by road, this will be achieved by encouraging multi-modal transport methods, including rail and water, and encouraging development in areas which minimise the need to transport waste.</p>
WR24-588	<i>Hartlebury Parish Council</i>	Specifically referring to this consultation paper we are in agreement with its objectives but we would question whether the proposed policies actually support them – for example, we do not believe	The Strategy is not technology specific and has not been weighted in favour of any technology type or application.

Reference	Name/Organisation	Summary of comments	Initial officer response
		that full, proper and fair consideration has been given to all possible technologies. We understand that this consultation does not want to be specific on technologies but we do believe that this paper has been weighted in favour of incineration due to the current Mercia application.	
WR32-1624	<i>Wyre Forest District Council</i>	WFDC are supportive of the objectives outlined within the consultation document. WFDC consider that the phrase ' <i>To do everything possible</i> ' should be deleted	Support noted. Change to be made.
PQ32-internal	<i>Worcestershire County Council Economic Development</i>	Are these in order of priority?	No. Footnote 57 states that objectives are numbered for convenience of referencing, not in order of significance.
PQ42-717 (L)	<i>Natural England</i>	Yes, we fully support the objectives. They are clearly linked to the vision.	Support noted.

Do the objectives reflect local issues and contribute towards the vision?

Reference	Name/Organisation	Summary of comments	Initial officer response
WO1			
To base our decisions on the principles of sustainable development and the need to reduce greenhouse gas emissions and to mitigate climate change			
PQ4-337	<i>Ashland UK Ltd, Kidderminster</i>	Part of a national initiative is best?	Climate change mitigation needs to be undertaken at both local and national levels.
PQ7-1551	<i>Spar Convenience Stores, Redditch</i>	Residents are always sceptical as to whether climate change can be affected	The UK has national and international legally binding targets to reduce CO ₂ emissions. It is government policy that "Effective spatial planning is one of the many elements required in a successful response to climate change." The background document " <i>Climate</i>

Reference	Name/Organisation	Summary of comments	Initial officer response
			<i>change and waste management in Worcestershire</i> " discusses the potential contribution that waste management in Worcestershire could make towards addressing these issues.
PQ24(also WR9) - 1645	<i>Mrs L Brookes</i>	So you wont want an incinerator then.	The Waste Core Strategy is not technology specific and does not propose an incinerator.
PQ27-1598	<i>Elgar Foods Ltd</i>	Contributes to vision but does not mention local issues.	The objectives have been developed to reflect the issues identified in "Setting the Context".
WO2			
To protect and enhance the county's natural resources, environmental, social, cultural and economic assets, the character and amenity of the local area and the health and wellbeing of the local people			
PQ24(also WR9) - 1645	<i>Mrs L Brookes</i>	So you want want an incinerator then.	The Waste Core Strategy is not technology specific and does not propose an incinerator.
WR30-716	<i>English Heritage</i>	We support the general thrust of objective WO2 with regard to the protection and enhancement of assets and the character of the local area. This objective flows from and supports the Vision. We interpret the historic environment and heritage assets (as per PPS5) as falling under the broad references to environmental and cultural assets. If these broad asset categories are further expanded in the light of other comments, we recommend that a specific reference to the historic environment and heritage assets is included.	Support noted. Specific reference has been given to the historic environment and heritage assets in "Setting the Context". This reference will be further developed in the policies.
WO3			
To do everything possible to minimise waste production and make driving waste up the waste hierarchy the basis for waste management in Worcestershire			

Reference	Name/Organisation	Summary of comments	Initial officer response
OR2-701	<i>Staffordshire County Council</i>	WO3 does not contribute to achieving the vision because it could never be achieved. (See <i>Staffordshire County Council's comment to question 6</i>)	Noted, change to be made.
PQ24(also WR9) - 1645	<i>Mrs L Brookes</i>	So no to an incinerator then!	The Waste Core Strategy is not technology specific and does not propose an incinerator.
WR24-588	<i>Hartlebury Parish Council</i>	With the introduction of co-mingled waste, maximum recycling cannot be achieved – it is proposed that waste that could be recycled will be burned because it is “dirty”. Maximum recycling should mean maximum recycling – not just that amount that leaves sufficient waste at the appropriate calorific value for burning. It is essential that the waste hierarchy (Reduce, Re-use, Recycle) is endorsed in full and not just the parts that might suit the present planning application.	Waste collection is outside the remit of the Waste Core Strategy and is the responsibility of the District Councils. Policy WCS2 makes specific reference to the Waste Hierarchy and this will be used to determine planning applications once the Waste Core Strategy is adopted.
WO4			
To ensure that the waste implications of all new development in Worcestershire are taken into account			
PQ24(also WR9) - 1645	<i>Mrs L Brookes</i>	Don't take waste from Herefordshire.	This objective refers to all types of new development in Worcestershire, including household and business uses, to ensure that waste arising from their development is minimised.
WO5			
To address the "Capacity Gap" between how much waste management capacity we have and what we need over the plan period to 2027			
PQ4-337	<i>Ashland UK Ltd, Kidderminster</i>	Worcs cannot absorb all waste disposal demands locally.	Due to economies of scale and the specialised treatment methods for some forms of waste it is inevitable that some wastes will be imported and exported into, out of and across the county. The strategy will however seek to minimise this and will be

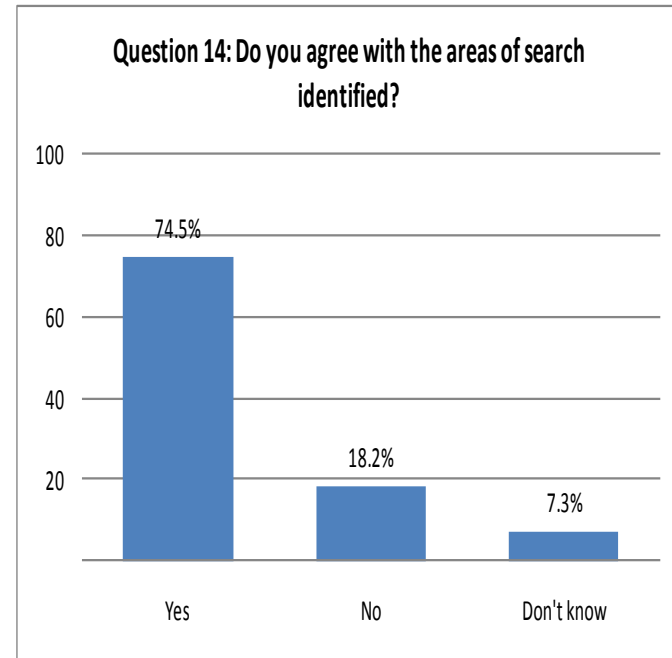
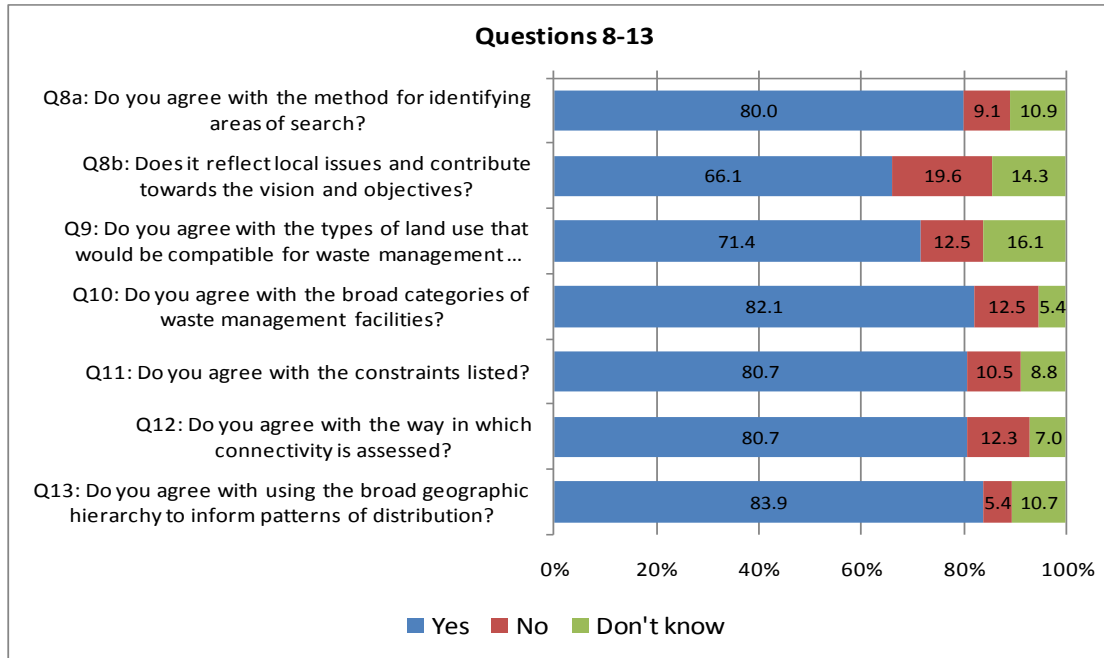
Reference	Name/Organisation	Summary of comments	Initial officer response
			based upon achieving equivalent self-sufficiency in waste management capacity.
OR5-1707	<i>Mr Brett</i>	Don't know: Since information on the quantity of waste entering or leaving the county is so poor the significance of the capacity gap is not fully known	The full document contained more detail on imports and exports on a national and regional basis (pages 21 to 24). The strategy will be based upon achieving equivalent self-sufficiency in waste management capacity. Worcestershire's capacity gap is set out in more detail in the background document " <i>Arisings and capacity</i> ", available on our website www.worcestershire.gov.uk/wcs .
OR8-625	<i>Norton & Lenchwick Parish Council</i>	W04 & W05 Given the elimination of the housing targets of the last government and the future involvement of local government to have more control over development it appears that the predictions made prior to the last 6 months may not be a true reflection of growth & development in Worcestershire	Noted. The Strategy will be based on the best available information and will be monitored to ensure proposals developed by the district councils are taken into account.
PQ24(also WR9) - 1645	<i>Mrs L Brookes</i>	2027 is too far in advance to plan. Waste is reducing all the time.	It is government policy that the strategy should apply for 15 years from the date of adoption which is expected to be 2012. It will be monitored annually and revised as appropriate.
WO7			
To reduce waste miles by road			
PQ4-337	<i>Ashland UK Ltd, Kidderminster</i>	Best option for waste streams may need transportation across the UK	Agreed. Due to economies of scale and the specialised treatment methods for some forms of waste it is inevitable that some wastes will be imported and exported into, out of and across the county. The strategy will however seek to minimise this and will be based upon achieving equivalent self-sufficiency in waste management capacity.
OR5-1707	<i>Mr Brett</i>	WO7 Not as this objective stands. Road transport	The objectives exist to direct policies. Policy

Reference	Name/Organisation	Summary of comments	Initial officer response
		along rural roads and through villages is a key issue, and this objective does not adequately address this.	WCS 4 and paragraphs 7.32-33 in the Full Document address this issue.
PQ20-502	<i>Pencroft</i>	WO7: as before	Noted.
PQ24(also WR9) - 1645	<i>Mrs L Brookes</i>	How will you interpret this? To be truthful about the miles ie it is not a good idea to transport all waste from 2 counties to one place.	Alternative means of transport to road will be encouraged, as well as locating facilities close to the source of waste arisings.
PQ38-1679	<i>Axis (on behalf of Mercia Waste Management)</i>	Not realistic in the context of paragraphs 2.13-2.16 of the emerging WCS.	Paragraphs 2.13-2.16 set out the context of the county as it is at present. The strategy seeks to minimise the distance waste is transported by road through considered location as well as the use of alternative means of transport, as stated in point vi of the vision.
WO8			
To encourage communities in Worcestershire to take responsibility for their own waste and involve all those affected as openly and effectively as possible			
PQ24(also WR9) – 1645	<i>Mrs L Brookes</i>	And communities in Herefordshire should deal with their own waste.	There are some waste management facilities in Herefordshire. However, Herefordshire's municipal waste will be managed in accordance with the policies in the reviewed Joint Municipal Waste Management Strategy which could include facilities in Worcestershire.
WO9			
To develop a waste management industry that contributes positively to the local economy			
PQ24(also WR9) – 1645	<i>Mrs L Brookes</i>	Yes as long as this is not an incinerator.	The Waste Core Strategy is not technology specific and does not propose an incinerator.
General Comments			
PQ17-620	<i>Martley Parish Council</i>	I am not sure waste management would be seen by all in Martley to be an issue	Waste is produced by all homes and businesses in the county. The Waste Core Strategy sets a framework against which proposals for facilities to manage this waste

Reference	Name/Organisation	Summary of comments	Initial officer response
OR12-1668	<i>Mr Dowty</i>	<p>The "capacity gap" is not realistic. As more and more waste is recycled and can be recycled e.g. plastics there is less and less need for any incinerator. If the composition of household waste is reviewed (from WCC's own waste core strategy information) more than 86% could have been recycled in some shape or form e.g. composted, dealt with via anaerobic digestion or mechanical biological treatment, recycled or re-processed rather than burning. The composition of the county's waste needs to change. An incinerator is completely against WO1, WO2 and WO3, WO7 and WO9. We want a waste strategy that maximises recycling, where people are rewarded not penalised for recycling, minimises landfill and does not need an incinerator. In order for a waste management industry that contributes positively to the local economy, more and more needs to be recycled. Why ask people to recycle food waste when every second week the food waste is tipped straight into landfill. That is wasteful in itself. ALL food waste should be composted or dealt with via anaerobic digestion. This process generates gas which can then be used. Existing waste management facilities are not appropriate- WCC needs to take into account the increased recycling rate in its future waste predictions. Also if there were similar recycling collections for commercial and industrial waste (around 80% of which could be recycled), this again would reduce the need for landfill.</p>	<p>will be assessed.</p> <p>The Waste Core Strategy is not technology specific and promotes the management of waste at the highest possible level of the waste hierarchy. Policy WCS 5 considers energy recovery from waste and requires sorting of waste to be carried out to maximise resource recovery and recycling.</p>
WR8-672	<i>White Ladies Aston Parish Meeting</i>	We do approve of the Vision and its objectives.	Support noted.

Reference	Name/Organisation	Summary of comments	Initial officer response
		However, we believe that the Objectives should also include a further section WO10 showing the County Council's intention to make a determined effort to ascertain the true figures of waste arisings, their sources and categories. Perhaps it should read along the following lines: "WO10 - To encourage the Environment Agency to improve upon their knowledge of the imports and exports of waste movements, we suggest the removal of the word 'assumptions' and ensure that the word 'accurate' can become part of the vocabulary in this document."	The Strategy is based on the best available information from the Environment Agency. Defra has been developing improved data collection for some years, we will use this if it becomes available. We do not think it would be appropriate to include the suggested objective as it is outside the remit of the Strategy and we would be unable to implement it.
WR27-740	<i>Cotswolds Conservation Board</i>	The Board is supportive of the vision, objectives and proposed policy framework as set out in the Strategy.	Support noted.
PQ42-717 (L)	<i>Natural England</i>	Yes, we fully support the objectives. They are clearly linked to the vision.	Support noted.

Question 8-13: Do you agree with the method for identifying areas of search?



	Yes	No	Unsure/ Don't Know
Do you agree with the method for identifying areas of search?	45	5	6
Does it reflect local issues and contribute towards the vision and objectives?	39	11	8
Do you agree with the types of land use that would be compatible for waste management facilities?	40	7	9
Do you agree with the constraints listed?	48	7	3
Do you agree with the way in which connectivity is assessed?	46	6	5
Do you agree with using the broad geographic hierarchy to inform patterns of distribution?	49	7	4
Do you agree with the areas of search identified?	47	3	6

Reference	Name/Organisation	Summary of comments	Initial officer response
(Q8a) Do you agree with the method for identifying areas of search?			
PQ4-337	<i>Ashland UK Ltd, Kidderminster</i>	People will object to waste sites in their areas.	Objective WO8 attempts to address this. A methodology has been developed which identifies locations throughout the county where waste management development is likely to be most suitable. People have been able to make comments on these locations as part of this consultation and will have the opportunity to comment on individual planning applications as they are brought forward.
PQ19-601	<i>Kempsey Parish Council</i>	Small scale waste transfer eg road planings are they covered by the strategy?	Yes. All scales of waste management facility will be covered by the Strategy.
PQ20-502	<i>Pencroft Ltd</i>	The conclusions are fine. But the method is complicated the traffic light system is difficult to understand and clumsy. The average man in the street couldn't understand a word of it!	Noted. This method will be simplified.
OR9-899	<i>Thomas Vale Construction</i>	There doesn't appear to be consideration of social impacts upon communities (if any) any how these would be addressed, for example increased traffic impacts, noise or other nuisance issues, is a minimum distance from urban areas required?	Policy WCS 4 considers the impact on local amenity and the need for mitigation measures to make proposals acceptable. Different types and scales of facility have different implications, and the <i>areas of search</i> identified are primarily industrial land, therefore a minimum distance would not be appropriate.
OR11-1586	<i>M V Kelly Ltd</i>	Depending on the type of waste to be disposed of, using green belt / conservation / special wildlife sites may prove unpopular with the public and may raise issues as to whether this has been thought out	The strategy is to protect these features from unacceptable development, rather than promote development on them.
OR12-1668	<i>Mr Dowty</i>	Areas for search should be existing waste sorting/transfer stations to minimise road miles of waste transport. Rural communities need to	Policy provision has been made for extensions to and increased capacity at existing waste management facilities, and the

Reference	Name/Organisation	Summary of comments	Initial officer response
		remain rural and not become industrial.	geographic hierarchy directs new facilities away from rural areas unless there is a special justification for them.
WR15-695	<i>Gloucestershire County Council</i>	The document does not clearly specify what each area of search would be suitable for in terms of a waste management facility. This should be made clear in the written part of the WCS and on any relevant maps and diagrams.	Noted. Changes will be made to clarify the broad categories of facilities which will be suitable on the areas of search.
OR14-ANON2	<i>Anonymous</i>	More priority to be given to Parishes having an involvement - not just facilities imposed. Consideration to be given to Parish Plans.	Parish councils are consulted on any individual planning applications within their parish, this will continue. Reference to Parish Plans will be added to the Strategy.
PQ35-ANON3	<i>Anonymous</i>	Consultation with councillors	Councillors are consulted on any individual planning applications within their ward, this will continue. They have also been consulted at every stage of the development of the Waste Core Strategy and will need to endorse it before it is adopted.
PQ42-717 (L)	<i>Natural England</i>	The method set out seems to conform to PPS10 therefore we agree.	Support noted.
OR16-547	<i>Chaddesley Corbett Parish Council</i>	The presumption about possible uses for redundant agricultural buildings may not fit with District and Parish Planning guidelines, where the first effort should be to seek alternative commercial uses.	Applications for individual planning applications will be determined in line with the development plan, which includes District Council's Development Plan Documents, and any other relevant material considerations, which may include Parish Plans. Waste management development which reuses redundant agricultural buildings is one form of commercial use.
(Q8b) Does it reflect local issues and contribute towards the vision and objectives?			
OR11-1586	<i>M V Kelly Ltd</i>	See Q8, you state that you reflect local issues; however, why are locally important features that contribute to the distinctive character of Worcestershire classified/identified as "secondary	The primary constraints are given priority in national policy. It would not be in accordance with those policies to give these features equal weight. Policies WCS 2 and 4 protect

Reference	Name/Organisation	Summary of comments	Initial officer response
		constraints"? Surely if this should be seen as more so a priority than not, as the focus seems to be with involving and adhering to the local areas	all of these features from unacceptable adverse impacts.
OR12-1668	<i>Mr Dowty</i>	To ensure protection of rural communities land compatible with waste management facilities should be at least 5 miles away from rural communities and should pay particular attention to feeding ground of wild birds.	It would not be in accordance with government policy to specify this kind of distance. The strategy will be based on the geographic hierarchy which promotes development in proximity to Worcestershire's main settlements. Policy WCS 2 prevents unacceptable adverse impacts on protected species and habitats identified in UK and local biodiversity action plans.
PQ24(also WR9) - 1645	<i>Mrs L Brookes</i>	No more waste should be brought to Hartlebury. Do not put large development in Green Belt areas or near residential properties. Why have large developments at all?	Policy WCS 4 states that facilities will not be allowed where they constitute inappropriate development in locations designated as green belt unless very special circumstances exist. Earlier consultations revealed popular support for centralised and large facilities, with provision for smaller facilities where appropriate.
PQ25-593	<i>Hindlip, Martin Hussingtree and Salwarpe Parish Council</i>	The Parish Council express concern on the impact upon Hindlip Parish from the identified locations for waste management facilities within the hierarchy of Worcester and its expansion areas namely location 1. Shire Business Park; 2. Berkley Business Park; 3 Warndon Business Park. The Business Parks situated between B4639 Cotswold and Berkley Ways and the A449 Dual Carriageway from M5 Motorway junction 6 to B4550 Hurst Lane; are on the boundary of the green belt and in particular in close proximity to the prestigious sixways Worcester Rugby Club site and park and ride facility.	In assessing locations, consideration was given to whether they were in the Green Belt. The locations mentioned are not within this constraint. We will be consulting with the Council's Highways Department and the Highways Agency regarding transport issues.

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>It is felt important evidence has not been taken into account as detailed below:</p> <ol style="list-style-type: none"> 1. The River Sow flows from the former Warndon farm fields (currently known as the Worcester Bosch technology site) through water drainage pipes under the A4440 Warndon way and the A449 onto the sixways rugby site which is the water catchment area for water surface run off into the barbourne brook. 2. The Barbourne brook runs on the north side of the identified locations and due to the topography of the surrounding land water run off creates flooding due to overloading in the existing Barbourne drainage system running through into the city of Worcester with a flood gate at perdiswell being "manually" controlled as flood risk increases. 3. Water run off from the waste development locations 1,2,5 must be taken into account along with climate change and the 1/100 year potential flood to protect the ecology, environment and anthropogenic assets downstream of the Barbourne brook catchment areas. 4. The impacts on the adjacent greenbelt from prevalent winds blowing from the South to North from the Business Parks; air quality emissions containing dioxins along with odours from waste processing affecting the environment of the open countryside within the adjacent green belt. 5. Transport of waste, local traffic and regional 	<p>All areas of search will be assessed against the District Councils' Strategic Flood Risk Assessments and revised accordingly.</p> <p>Air Quality emissions will depend on the type of development and will be assessed against policy WCS 4 as individual applications are brought forward.</p> <p>We will be consulting with the Council's</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
		HGV traffic resulting in additional traffic utilising the already overloaded junction 6 of the M5 motorway and the busy feeder routes to the location via the B4639 B4550 and A449 6. The Birmingham to Worcester Canal and Its canalside conservation areas running along the northern boundary of the sites. The paths being designated part of the sustrans national cycle network.	Highways Department and the Highways Agency regarding transport issues. Conservation Areas were identified as a constraint when assessing areas of search, none of the identified locations are within conservation areas.
PQ26-634	<i>Pershore Town Council</i>	Use of Keytech and/or Pershore Trading Estate not practical in view of lack of infrastructure including western link road	We will be consulting with the Council's Highways Department and the Highways Agency regarding transport issues.
PQ30-1649	<i>EM Jones</i>	The right type of development for the right place not buying land in advance and then saying "this is suitable because it is available".	The identification of areas of search is intended to direct development to the right place. The availability of individual sites was not part of the assessment.
PQ39-517	<i>Alvechurch Parish Council</i>	A specific proximity factor (to residential development) needs to be explicitly incorporated as does site access (not just transport connectivity in general).	Impacts on neighbouring development will be considered against policy WCS4 as proposals are brought forward. We will be consulting with the Council's Highways Department and the Highways Agency regarding transport issues.
PQ42-717 (L)	<i>Natural England</i>	Local issues should be picked up at the various stages of assessment. The maps also reflect local issues. It does contribute to the vision and objectives.	Support noted.
(Q9) Do you agree with the types of land use that would be compatible for waste management facilities?			
OR5-1707	<i>Mr Brett</i>	In general yes, but not enough emphasis has been given to municipal waste water treatment plants, which are: (a) competent at dealing with "dirty" waste and (b) experienced in the use of anaerobic digestion as a disposal technique.	Sewage treatment capacity has been identified as a concern over the period of the Waste Core Strategy. Further consideration will be given to these as we develop the policies.
OR6-800	<i>Herefordshire &</i>	Agree in principal that mineral workings or landfill	Agreed, this will be addressed through Policy

Reference	Name/Organisation	Summary of comments	Initial officer response
	<i>Worcestershire Earth Heritage Trust</i>	sites could be used for Category 1 & 2 facilities. However, there are a number of mineral workings in the county that have not been assessed for their geological value, in terms of designation as a Local Geological Site. Therefore, if any development was to take place within a mineral site, it is recommended that a geological survey be undertaken prior to any development, and if a site is recommended for designation, that appropriate mitigation measures are put in place in order to conserve the features identified.	WCS 4.
PQ19-601	<i>Kempsey Parish Council</i>	<i>(Answer: don't know)</i> Sites close to rivers (eg the Severn), not necessarily in the flood plain, but representing a threat from water runoff (e.g. dumps of material)	Policy WCS 2 and Annex 1 address flood risk. The Environment Agency is the pollution control authority. We will seek their advice when considering individual applications.
OR12-1668	<i>Mr Dowty</i>	Those areas classed as "Industrial estates" are actually small rural "TRADING" estates; therefore they are not suitable for waste treatment facilities of any kind.	All areas of search were visited as part of the process to assess their suitability in principle for waste management facilities. Specific proposals will be assessed against policy WCS 4 to ensure they do not have unacceptable impacts on local amenity and will be compatible with surrounding uses.
PQ23-626	<i>Norton-juxta-Kempsey Parish Council</i>	<i>(Answer: No)</i> "sites with current use rights for waste management purposes" might be completely inappropriate for expansion since their use might well have been granted by a different methodology some time ago.	Noted. Policy will be changed so that development on sites with current use rights must demonstrate that it is operationally related. Applications will also be assessed against other policies in the Strategy.
PQ24(also WR9) - 1645	<i>Mrs L Brookes</i>	Use of landfill sites in Hartlebury should not continue. Stage 1 seems as though you've tried to link it to Hartlebury Trading Estate	Stage 1 methodology was based on the types of compatible land use put forward in the West Midlands Regional Spatial Strategy. Although the RSS has now been revoked, these land types were agreed as being suitable through discussion with stakeholders at a regional level. They have therefore been

Reference	Name/Organisation	Summary of comments	Initial officer response
			used as a starting point for this stage of the methodology.
WR30-716	<i>English Heritage</i>	We broadly agree with the types of existing land use types as outlined. With regard to redundant agricultural or forestry buildings and their curtilage, this broad type could include traditional farm buildings and the wider historic farmstead. We consider it important that any decisions are therefore fully informed by the sensitivity and capacity of the respective farm buildings and the farmstead. The products from the West Midlands Farmsteads and Landscapes Project can assist with this by providing information on the character of traditional farm buildings and supporting planning tools to inform decision-making at an area and site based level. The work includes a detailed county report and mapped information held in the Historic Environment Record. Further information on the project is available via the following link http://www.englishheritage.org.uk/wmidlandsfarmsteads , and can be obtained from the County Council's historic environment team (contact: Adam Mindykowski).	This will be reviewed and relevant changes will be made.
PQ30-1649	<i>EM Jones</i>	Not in greenbelt area. Not where it would impact on visual amenity. Not where it would impact on wider greenbelt area. Not where it would impact on wider landscape and destroy the wider amenity.	Policies WCS 4 addresses these issues.
PQ35-ANON3	<i>Anonymous</i>	Position is more important than type of land	Individual proposals will be assessed as they are brought forward.

Reference	Name/Organisation	Summary of comments	Initial officer response
PQ36-688	<i>Herefordshire and Worcestershire Joint Waste Resource Management Forum</i>	<p>We support the decision not to include land within/adjoining sewage works as the Water Cycle Strategies completed to inform the LDF Evidence Base have identified potential future constraints associated with growth. Also support for not considering redundant agricultural/forestry buildings as it is possible that these buildings could be brought back into use to support localised food and wood fuel production within the plans.</p> <p>We are concerned that there appears to be an inconsistency between the WCS stance that considers existing waste sites as being discrete sites where existing employment sites are readily identified. Further, if individual existing employment sites are to be identified then the supporting text should make clear that they are identified for illustrative purposes only.</p> <p>Box 3 is confusing in that the pretext and content of box three are at odds. The title implies that all those locations listed are compatible, although clearly some of those specified are not considered to be compatible. Box three would benefit from further explanation as to why certain types of existing land use within Worcestershire are not suitable i.e. if the intention of box three is to detail the findings of research into suitable locations as stated in para 4.7 then this should be made clearer.</p>	<p>Support noted.</p> <p>This will be considered in developing this element of the strategy.</p> <p>This will be considered in developing this element of the strategy.</p>
PQ38-1679	<i>Axis (on behalf of Mercia Waste Management)</i>	The land uses should be explicitly ranked in order of preference with: 1. Industrial land, 2. Contaminated or derelict... Then as is...	This will be considered in developing this element of the strategy.

Reference	Name/Organisation	Summary of comments	Initial officer response
PQ39-517	<i>Alvechurch Parish Council</i>	(Answer yes) But some concerns as to how the redundancy of agricultural land is assessed, verified and agreed by local communities.	This will be considered as we develop the policies.
PQ42-717 (L)	<i>Natural England</i>	Broadly agree as these types of land use are in line with policy W5 from the rescinded RSS.	Support noted.
(Q10) Do you agree with the broad categories of waste management facilities			
OR5-1707	<i>Mr Brett</i>	More emphasis should be put on WWTPs as a potentially positive option.	This will be considered as we develop the policies.
PQ24(also WR9) - 1645	<i>Mrs L Brookes</i>	No incinerator at Hartlebury Trading Estate	The Waste Core Strategy is not technology specific and does not propose an incinerator.
OR14-ANON2	<i>Anonymous</i>	These all presume that Cat 1 facilities have to be major developments. This is false. There should be an emphasis on making facilities as local as possible which may mean more and smaller facilities but these would be located locally and would reduce transport, therefore being more environmentally sound than larger scale developments. Larger scale developments should be avoided.	This concept will be refined and will make allowance for facilities at a variety of scales.
PQ30-1649	<i>EM Jones</i>	Smaller facilities and several hundred sites known to be affected by contamination it is not useful to identify these sites - why not?	This contamination exists on a variety of different sites and to a range of degrees (for example an oil spill on a private driveway). Whilst some records of this are held by the District Councils, it is not considered useful in the method for identifying potential areas of search. Change to be made in text to clarify this.
PQ32-internal	<i>Worcestershire County Council Economic Development</i>	Why is waste water treatment in category 3? Does this include AD from sewage?	This concept will be refined and clarified.
PQ36-688	<i>Herefordshire and</i>	We support the three broad categories in Table 5	This concept will be refined and clarified.

Reference	Name/Organisation	Summary of comments	Initial officer response
	<i>Worcestershire Joint Waste Resource Management Forum</i>	but consider the examples given as inappropriate. It is our view that some types of materials recovery (especially high value/ high tech recovery) should be achievable within Category 2 facilities and are aware of examples in support of this (e.g. recovery of PVC insulation from electrical cable by mechanical means which is almost silent in operation). Transfer operations are also similar to logistics/ distribution activities and can often be considered accordingly.	
PQ38-1679	<i>Axis (on behalf of Mercia Waste Management)</i>	In-vessel composting facilities should be moved to Category 1.	This concept will be refined and clarified.
PQ39-517	<i>Alvechurch Parish Council</i>	Broadly yes, but how do you define small scale and what stops a farmer making some agricultural buildings 'redundant' and then developing a waste transfer facility (ie rendering)	This concept will be refined and clarified and scale will be defined.
PQ42-717 (L)	<i>Natural England</i>	Broadly agree as based on scale - which we supported in the emerging options.	Support noted.
(Q11) Do you agree with the constraints listed?			
PQ7-1551	<i>Spar Convenience Stores, Redditch</i>	Green belt not previously developed nature reserves special wildlife sites should not be used as infrastructure improvement would result in degrading these areas.	All development will be located in existing buildings or on previously developed land unless there are no suitable sites. European and nationally designated nature conservation sites are listed as primary constraints; local nature reserves, special wildlife sites and green belt are identified as secondary constraints. Policy WCS 4 states that development will need to protect and enhance nationally designated biodiversity, geodiversity and historic sites and sites of local importance, and that proposals which would constitute inappropriate development in the green belt must demonstrate that very

Reference	Name/Organisation	Summary of comments	Initial officer response
			special circumstances exist.
OR6-800	<i>Herefordshire & Worcestershire Earth Heritage Trust</i>	Agree with the constraints listed and it is welcomed that Local Geological Sites are included in the secondary constraints list. However the Local Geological Site data is currently out of date. The latest data, which was provided in the form of shape files in order to delineate areas for the designations, was submitted to the County Council GIS Officer and Biodiversity Officers in the last 6 months. It is suggested that these individuals be contacted in order that the boundaries for the LGS can be added to the relevant map.	Noted, map to be updated.
OR12-1668	<i>Mr Dowty</i>	Constraints need to be within 5 miles or more of any proposed waste treatment plant as many of the constraints are affected by ANY type of waste treatment. I would also suggest that further constraints should be the feeding area of certain wild birds and the topical landscape surrounding any proposed waste treatment facility i.e. is the land in a dip or will anything accumulate in bad weather.	It would not be in accordance with government policy to specify this kind of distance. Policy WCS 2 prevents unacceptable adverse impacts on protected species and habitats identified in UK and local biodiversity action plans. Policy WCS 2 requires landscape and biodiversity considerations to have been determining design features. Policy WCS 4 requires proposals to take into account local landscape character.
WR29-719	<i>The Environment Agency</i>	Site allocations and flood risk: We have set out our comments on the approach to managing the evidence base in the lack of a Level 2 SFRA for Bromsgrove and Redditch in our separate letter (enclosed). Please read this in conjunction with this letter. We are not satisfied with the approach of allocating some of the sites where the evidence base is not yet complete. The sites in question are:	Further assessments will be undertaken in discussion with the Environment Agency to address these issues.

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>The Flood Zone 2 sites in Redditch:</p> <p>29 - Park Farm Industrial Estate 30 - Pipers Road Park Farm 31 - Washford Industrial Estate 33 - Lakeside Industrial Estate</p> <p>These may change however when the SFRA is completed, and you should be more able to identify the appropriateness of allocating these sites if the information mentioned above (percentage of site affected by flooding, depth and frequency of flooding, access issues) is included in the SFRA.</p> <p>The following sites in Bromsgrove are currently identified in Flood Zone 1 but given the uncertainty about our flood zone mapping in Bromsgrove these may be found to be in Flood Zone 2 upon completion of the SFRA:</p> <p>36 - Buntsford Hill Industrial Estate 37 - Buntsford Gate Business Park 38 - Silver Birches Business Park 39 - Bromsgrove Technology Park</p> <p>We would also draw your attention to the following sites and queries over their flood zones:</p> <p>57 - Upton upon Severn Industrial Estate This site is affected from River Severn flood zones. It appears to show Flood Zone 3. We may be able to provide modelled levels for this site, but</p>	

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>recommend you check this site again for the floodplain status and information within the SFRA.</p> <p>23 - Former British Sugar Site We recommend you re-check the flood zones for this site - it is listed as Flood Zone 2, but the site is very high above the Stour, and it is likely that a topographical survey would identify it as Flood Zone1. A revised Stour model now exists and we may be able to provide river levels for this. The minimum level on site appears to be 30m Above Ordnance Datum (AOD). At the toe of the bank coming up from the canal, at road level the ground levels are around 45mAOD. The 1 in 1000 year flood level is indicated as 29.9m AOD just below the viaduct.</p>	
WR30-716	<i>English Heritage</i>	<p>We have a number concerns with regard to the approach adopted for the assessment of constraints. This may in part be due to the presentation of the document, but we would welcome further clarification and assurance of a robust approach to the historic environment and heritage assets.</p> <p>In particular, in previous responses we have endorsed the importance of including designated heritage assets as primary constraints (e.g. Registered Parks and Gardens, Registered Battlefields, scheduled monuments, listed buildings, conservation areas). Whilst these are listed in Box 4 as primary constraints, this does not accord with Figures 11 and 12, and nor indeed with Box 5 on secondary</p>	Noted, some drafting errors are acknowledged. Updates will be undertaken to correct these in accordance with this recommendation.

Reference	Name/Organisation	Summary of comments	Initial officer response
		constraints which also includes battlefields. Figure 11 (primary biodiversity constraints) confusingly includes scheduled monuments, whilst Figure 12 secondary constraints includes Registered Parks and Gardens and Registered Battlefields. We recommend that the scope and content of these figures are amended to reflect the approach outlined in Box 4. In view of this, we would also welcome confirmation from the Council that designated heritage assets have been used as primary constraints in the assessment process in informing areas of search.	
PQ36-688	<i>Herefordshire and Worcestershire Joint Waste Resource Management Forum</i>	<p>May wish to consider including Best and Most Versatile Agricultural Land in secondary constraints?</p> <p>You may wish to include reference to the constraints' situation i.e. the way in which something is placed in relation to its surroundings, similar to "Listed Buildings and its setting"</p>	<p>This will be considered as we develop the policies.</p> <p>This element of the Strategy assesses whether an area of search is within a constraint. Reference to settings is addressed by policy WCS 4.</p>
PQ37-1622	<i>Worcester City Council</i>	(Answer yes) I would question whether Green Belt, Local Nature Reserves and Special Wildlife sites should be secondary. Particularly in Worcester where LNRs are relatively small but significant and more sensitive within the City's green network and not lost in the wider countryside.	Noted but this would not accord with national policy. However, the reference to these being important local features will be strengthened.
PQ41-	<i>Wychavon District</i>	Suggest that the Worcestershire Green	This will be reviewed and changes made as

Reference	Name/Organisation	Summary of comments	Initial officer response
1623	<i>Council</i>	Infrastructure Study is referenced and the green networks identified therein be considered as a lower order layer to the constraints assessment.	necessary.
PQ42-717 (L)	<i>Natural England</i>	It is good to see that the flood zone has been included on the map as per our comments in the emerging options.	Support noted.
PQ43-526 (L)	<i>Beoley Parish Council</i>	Residential proximity and impact on local communities need to be examined	Different types of waste management facilities will have different potential impacts. These will be assessed against other policies in the strategy as proposals are brought forward.
(Q12) Do you agree with the way in which connectivity is assessed?			
PQ4-337	<i>Ashland UK Ltd, Kidderminster</i>	Does anyone really dispose of waste via waterways or rail anymore?	Yes, but not in this county at present. A current operational example for the transportation of freight on the River Severn is for the transportation of aggregates to Ryall quarry from Ripple quarry where it is processed before onward transport by road. Although this is not for the transportation of waste, aggregates are similar in that they are a high volume, low value product and as a result illustrate the feasibility of small scale freight operations in Worcestershire, particularly along the 'commercial inland waterway' of the River Severn. The Strategy aims to encourage sustainable transport of waste in future.
OR12-1668	<i>Mr Dowty</i>	Existing waste sites need to be used before determining use of a new site. Road miles of transporting waste needs to be reduced significantly as this does not comply with the Government's target to reduce CO2 and greenhouse gases.	Policy provision has been made for extensions to and increased capacity at existing waste management facilities. The geographic hierarchy directs new facilities towards the source of waste arisings with the aim of reducing the distance waste is

Reference	Name/Organisation	Summary of comments	Initial officer response
			transported.
WR8-672	<i>White Ladies Aston Parish Meeting</i>	Because of various development proposals currently in the pipeline, we believe that it will be necessary for Highways to have a long hard look at the A44 and Junction 6 as it would seem that Junction 6 could be accommodating four sites whilst Pinvin will be accommodating three sites. As we have no idea of the size, type of waste or method of disposal or indeed the number of vehicles these sites would generate, we feel we are unable to find the proposed sites 1, 2, 4, 5, 50, 51 and 52 acceptable in the current development uncertainty.	Noted. The County Council's Highways department has been consulted on the areas of search and will be consulted on any applications as they come forward.
OR14-ANON2	<i>Anonymous</i>	The connectivity is based on transport connections on the basis that this is necessary, hence large scale developments. I do not agree with this as developments should be smaller and more local, thus of more environmental benefit and cheaper in the long term, although multiple developments have higher set up costs overall.	The connectivity concept is valid for both large and small facilities.
WR26-704	<i>Warwickshire County Council</i>	I would like to make the following comments In relation to Figure 16: Areas of Search. A number of the sites in Redditch which are identified as potential areas of search for new or expanded waste recycling facilities are located in the east of the town close to the A435 and the border of Warwickshire. Whilst it is recognised that such facilities are primarily provided for local people in the Redditch area, there will inevitably be a draw of people from Western Warwickshire. We would like to seek reassurance that this issue has been considered in the sifting process for the	Noted, this issue will be discussed with the County Council's transport department and the Highways Agency. Reference to the Air Quality Management Area will be strengthened.

Reference	Name/Organisation	Summary of comments	Initial officer response
		areas of search, particularly in the context of the potential impact of additional traffic on the A435 and the existing Air Quality Management Area in Studley.	
PQ27-1598	<i>Elgar Foods Ltd</i>	Also good existing local carriageways or motorways have not been considered, if existing roadways are either underutilised or suitable	Noted, this issue will be discussed with the County Council's transport department and the Highways Agency.
PQ32-internal	<i>Worcestershire County Council Economic Development</i>	Need to take into account the broader economic benefits of improving connectivity	This is an issue which will be addressed by the Local Transport Plan.
PQ36-688	<i>Herefordshire and Worcestershire Joint Waste Resource Management Forum</i>	This is a valid assessment but it should be noted that there are no functional railheads currently within Worcestershire and only a limited amount of navigable waterways so significant investment in infrastructure would be required if either of these methods were to be used. Many waste related journeys are also of a local or short distance nature which makes use of rail or water transport impracticable. Movements by rail and water are more suitable for certain types of waste management activity such as scrap metal or aggregates.	Noted.
PQ37-1622	<i>Worcester City Council</i>	This is a valid assessment but it should be noted that there are no functional railheads currently within Worcestershire and only a limited amount of navigable waterways so significant investment in infrastructure would be required if either of these methods were to be used.	Noted.
PQ38-1679	<i>Axis (on behalf of Mercia Waste Management)</i>	Too much weight has been given to the use of multi-modal transport in the assessment of connectivity.	The strategy seeks to minimise the distance waste is transported by road through considered location as well as the use of alternative means of transport, as stated in

Reference	Name/Organisation	Summary of comments	Initial officer response
			point vi of the vision. Whilst multi-modal potential is given priority in identifying areas of search, we acknowledge that the potential is limited and allow for sites with good transport connectivity by one mode only.
PQ39-517	<i>Alvechurch Parish Council</i>	Broadly yes, but specific site access is important too.	Noted and agreed.
PQ41-1623	<i>Wychavon District Council</i>	The District Council's position on the proposed incinerator at Hartlebury Trading Estate is a matter of public record. However, when determining the application the County Council are respectfully requested to have regard to the Stage 3: Assessment of connectivity and give due weight to it as policy submitted to the Secretary of State prior to the consideration of the application. The proposed site is located within a rural location and therefore performs poorly against the emerging WCS hierarchy of site selection.	Applications for planning permission will be determined in accordance with the development plan at that time. The strategy will be given very limited weight until it is submitted to the Secretary of State. This comment has been forwarded to the Council's Development Control manager.
PQ42-717 (L)	<i>Natural England</i>	The assessment seems logical and supportive of encouraging water and rail over road transport.	Support noted.
(Q13) Do you agree with using the broad geographic hierarchy to inform patterns of distribution?			
PQ18-618	<i>Malvern Wells Parish Council</i>	Note - The connectivity rules are not applicable to waste water treatment plants so should not be applied to that development	Noted. The meaning of connectivity in relation to waste water treatment plants will be considered and clarified.
PQ21-880	<i>Mr Angell</i>	Yes but qualified: Might there be stronger emphasis on adaptation / additional rail infrastructure provision considering the overwhelming role of freight trains / land-use efficiency?	The method used for identifying areas of search promotes those locations which have potential for connections to the rail network.
PQ24(also WR9) - 1645	<i>Mrs L Brookes</i>	Deal with waste in its own area or a geographical central point ie Worcester. No waste from Herefordshire!	The geographic hierarchy directs new facilities towards the source of waste arisings with the aim of reducing the distance waste is transported.
PQ36-688	<i>Herefordshire and</i>	Agree with the general approach, however we	This concept will be considered as our

Reference	Name/Organisation	Summary of comments	Initial officer response
	<i>Worcestershire Joint Waste Resource Management Forum</i>	suggest that the evenly spread aspiration targets within categories and across categories are not flexible enough. It would seem more logical to set a category aspiration rather than an individual settlement aspiration. This would allow a more flexible approach to identifying locations.	approach is refined.
PQ42-717 (L)	<i>Natural England</i>	Natural England has no particular comment to make.	Noted.
(Q14) Do you agree with the areas of search identified?			
PQ21-880	<i>Mr Angell</i>	Yes but apparent inconsistency in Addendum: 1. Positive acknowledgement of Hartlebury Trading Estate recognition! 2. Former British Sugar Site, Kiddermings, "listed" as 21 yet shown on map as 23.	Noted. Noted. We apologise for any inconvenience this caused in interpreting the documents. The numbering will be carefully checked before the Submission Consultation is published in 2011.
OR4-680	<i>Bromsgrove District Council</i>	In terms of Bromsgrove, these large employment sites and quarries would be best suited to the areas of search identified and no other locations are suggested.	Support noted.
OR12-1668	<i>Mr Dowty</i>	Waste should be processed as close to arising as possible. The projected waste arisings need to be reviewed over the next 20 years in line with significantly increased recycling and the operation of the envirosort plant at Norton which was not accounted for in the JWMCS as it had not been opened when this took place.	The geographic hierarchy directs new facilities towards the source of waste arisings with the aim of reducing the distance waste is transported. The capacity of EnviroSort has been included in our calculations. Projected waste arisings will be monitored and used to inform reviews of the strategy.
WR14-682	<i>Redditch Borough Council</i>	In general terms we are fully supportive of the content put forward in the Document and would encourage the location of waste management	Support noted.

Reference	Name/Organisation	Summary of comments	Initial officer response
		facilities in the Borough at any of the sites put forward in the document.	
PQ24(also WR9) - 1645	<i>Mrs L Brookes</i>	Don't try to fit it all around Hartlebury Trading Estate!	A methodology was developed to assess potential suitable sites in Worcestershire. 160 locations in the county were assessed, of these 58 locations were identified as areas of search at this stage. One of these sites was Hartlebury trading estate.
WR32-1624	<i>Wyre Forest District Council</i>	<p>Generally there are no major concerns with the identified areas of search for the Wyre Forest District. Future development for waste should be targeted to the more industrial sites before considering other options</p> <p>With regards to the areas of search as indicated opposite, WFDC have the following comments:</p> <p>23. Former British Sugar Site – this site is likely to be redeveloped as a mixed use area, therefore the proximity of residential development within this location will need to be considered with regard to any new waste management facility.</p> <p>25. Greenhill Industrial Estate – there are concerns about identifying this site as an area of search due to the fact that the site is bounded on all sides by residential development. Furthermore, this site fulfils a quasi-retail function and there are concerns regarding how a waste management facility would sit in the context of the current occupiers, as well as the adjacent residential neighbours.</p> <p>27. Blackstone Quarry – WFDC query the</p>	<p>Support noted.</p> <p>Different types of waste management facilities will have different potential impacts. These will be assessed against other policies in the strategy as proposals are brought forward.</p> <p>Different types of waste management facilities will have different potential impacts. These will be assessed against other policies in the strategy as proposals are brought forward. The assessment considered the industrial units rather than the retail area, this will be clarified.</p> <p>Noted, this area of search will be</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>allocation of this site as an 'area of search' given the short amount of time left on the landfill capacity with little potential for further development. It is not considered that this would therefore continue to be a suitable area of search for new facilities, especially as the document makes no provision for further landfill sites to be developed over the life of the plan.</p> <p>For clarity it might be worth re-arranging the numbers for Ikon Trading Estate (26) and Blackstone Quarry (27) so that all of the sites within the District are ordered sequentially. This would make it easier for readers; it might also be worthwhile including the District that each of these sites falls within to aid the clarity of the document.</p> <p>Although none of the sites identified for 'large' waste management facilities are located within Wyre Forest, it is considered that there needs to be an explanation of what constitutes a 'large', 'medium' and 'small' waste management facility. It is difficult to fully consider and respond to the consultation without awareness of the size of facilities that may be considered suitable within each of the identified areas.</p>	<p>reconsidered as our approach is refined.</p> <p>The areas of search were arranged in accordance with their performance against the traffic light assessment. We will consider reordering these for greater clarity. Any mapping of the areas of search will include District boundaries.</p> <p>Noted, change to be made.</p>
PQ26-634	<i>Pershore Town Council</i>	Keytech and Pershore Trading Estates roads are incompatible with this type of transport!	This issue will be discussed with the County Council's transport department and the Highways Agency.
PQ35-ANON3	<i>Anonymous</i>	Area should be extended	It is not clear what area this comment referred to. We invite further clarification from this respondent.
PQ36-688	<i>Herefordshire and</i>	Sentence three of para 4.27 (" <i>Only locations</i>	Noted, this will be clarified.

Reference	Name/Organisation	Summary of comments	Initial officer response
	<i>Worcestershire Joint Waste Resource Management Forum</i>	<i>classified as green at least one category have been identified as areas of search") – it is difficult to appreciate the exact point being conveyed.</i>	
PQ37-1622	<i>Worcester City Council</i>	Table 8 - Shrub Hill	Noted, change to be made.
PQ42-717 (L)	<i>Natural England</i>	The focus on existing industrial/commercial land, quarries etc appears logical and the methodology is clear.	Support noted.
PQ43-526 (L)	<i>Beoley Parish Council</i>	No information provided to support why large areas of the rural county have been ignored	The geographic hierarchy (Table 7) identified rural areas and stated that proposals were to be assessed as they were brought forward. No areas of search have been identified in these areas due to the dispersed nature of rural waste arisings.
PQ2-246	<i>Forest Garden Ltd, Units 291&296 Hartlebury Trading Estate</i>	<i>Agreed with methodology, disagreed with locations.</i> Business impact at Area 14 Hartlebury Trading Estate	Policy WCS4 will address the potential impacts of proposals as they are brought forward.
OR16-547	<i>Chaddesley Corbett Parish Council</i>	Chaddesley Corbett supports Hartlebury in its objections to the proposed siting of a large facility at the Trading Estate there, due to its potential adverse impact on adjacent green belt locations.	Policy WCS 4 states that facilities will not be allowed where they constitute inappropriate development in locations designated as green belt unless very special circumstances exist. However, all applications will be determined in accordance with the development plan at the time, unless material considerations indicate otherwise. Because the Strategy has not been submitted, tested at examination or adopted by the council, the First Draft Submission Consultation Waste Core Strategy will be given no weight in the determination any applications.
PQ20-502	<i>Pencroft Ltd</i>	<i>(Answer yes)</i> but would a waste recycling centre be acceptable at Shire Business Park with 3 greens!!!	Shire Business Park was identified as an area of search due to its performance in the traffic light assessment. Any individual proposals

Reference	Name/Organisation	Summary of comments	Initial officer response
			will be assessed against other policies in the strategy as they are brought forward.
WR20-659	<i>Stourport-on-Severn Town Council</i>	There is but one question from the Town Council, as follows. The potential new site which is numbered 25 and which relates to Blackstone Quarry appears from the map to be located within the administrative boundary of Stourport-on-Severn, whereas it is understood that the Quarry is located within the administrative areas of Bewdley. The question which the Town Council raises, and which relates to the site numbered 25, is what type of facility would be envisaged for Blackstone? An indication would be helpful, please.	The figure was diagrammatic. District boundaries will be added to maps illustrating areas of search. The Waste Core Strategy is not technology specific and provides policies to assess proposals as they come forward.
OR5-1707	<i>Mr Brett</i>	I see no WWTPs.	Noted, change to be made.
OR6-800	<i>Herefordshire & Worcestershire Earth Heritage Trust</i>	<p>There are some areas of search identified that may have a geological interest in terms of meriting designation as a Local Geological Site (LGS) or may fall within, or immediately adjacent too, a Local Geological Sites. The latest data on LGS should be obtained.</p> <p>All the areas of search should be addressed on a case by case basis with regards to development, as the Earth Heritage Trust has limited resources in terms of capacity with which to survey and assess a site against the LGS criteria for all areas of search identified. Of particular interest however are those areas of search identified that occur within or immediately adjacent to, a minerals site. Further work should be undertaken in order to assess whether such a site could be a candidate for designating as a Local Site.</p>	<p>Noted, map to be updated and areas of search assessed against new data.</p> <p>Policy WCS 4 will be updated so that this is considered as proposals are brought forward.</p>
OR12-	<i>Mr Dowty</i>	Land by existing waste transfer facilities should be	Policy provision has been made for

Reference	Name/Organisation	Summary of comments	Initial officer response
1668		<p>used as much as possible.</p> <p>Rural communities and the green belt need to be protected. There is no site in Worcestershire suitable for large scale waste management facilities due to local plan and green belt restrictions.</p>	<p>extensions to and increased capacity at existing waste management facilities.</p> <p>Policy WCS 4 states that facilities will not be allowed where they constitute inappropriate development in locations designated as green belt unless very special circumstances exist. Earlier consultations revealed popular support for centralised and large facilities, with provision for smaller facilities where appropriate.</p>
PQ24(also WR9) - 1645	<i>Mrs L Brookes</i>	<p>Hartlebury Trading Estate is not suitable for a large development of any kind. No development can be higher than 15m re local planning policies. Why is Hartlebury Trading Estate suitable for a large scale development? Waste management in the area has been appalling.</p> <p>Is this to link to Hartlebury Trading Estate/ You should not use land in the Green Belt</p>	<p>Policies will be revised to define small, medium and large scale. This will be on the basis of average size or throughput rather than height or scale of buildings. Visual impacts will be assessed through policy WCS 4.</p> <p>Policy WCS 4 states that facilities will not be allowed where they constitute inappropriate development in locations designated as green belt unless very special circumstances exist.</p>
WR20-659	<i>Stourport-on-Severn Town Council</i>	<p>Basically, the Council accepts the principles upon which the Waste Core Strategy is based, and notes that every proposed new site would have to undergo a sustainability appraisal.</p>	<p>Support noted. Individual proposals would not be subject to a sustainability appraisal but would need to be assessed against the policies set out in the Strategy.</p>

Question 14(d): If there are any other locations that you think might be suitable for consideration as *areas of search* please provide details?

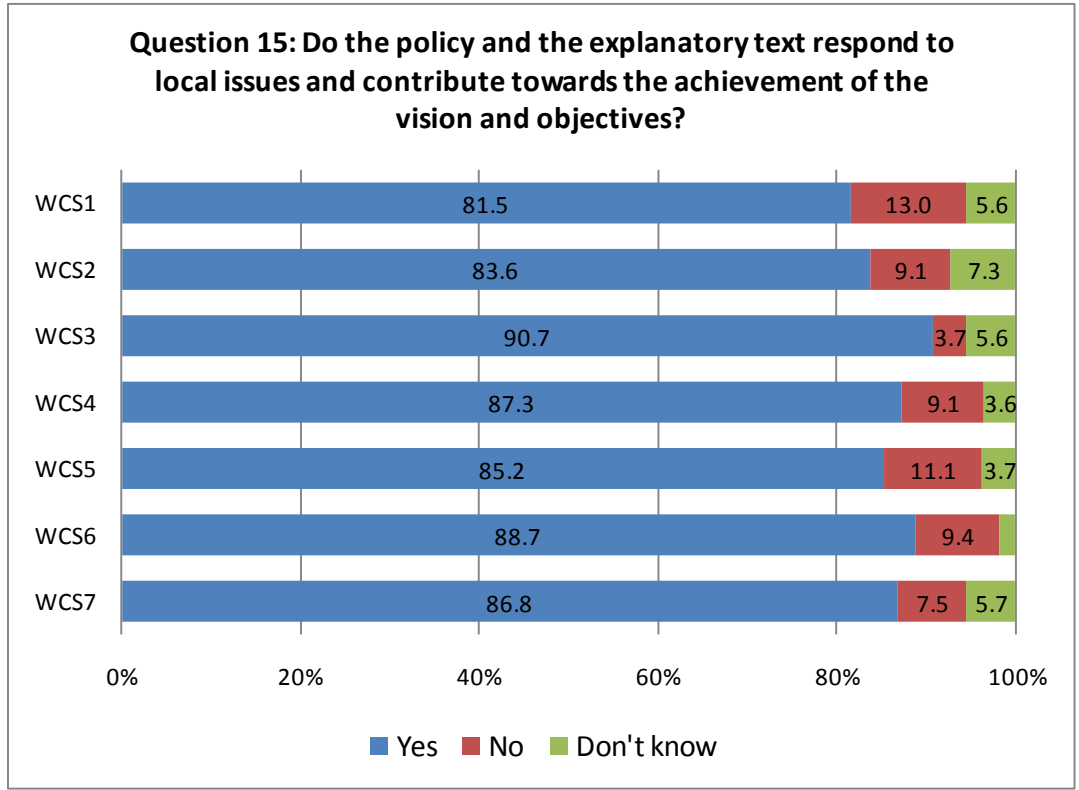
Reference	Name/Organisation	Area proposed	Officer comments and summary of Traffic Light Assessment
PQ6-188	<i>M&M Timber Co. Ltd, Kidderminster</i>	Summerfield Plant Area Worcester/Hartlebury Road. Land adjacent to Hoo Farm Ind Est.	Site assessed. The Summerfield Plant Area is a restricted area under the Official Secrets Act and will therefore not be proposed as an area of search.
WR2-1704	<i>Upton Business Centre</i>	Upton Business Centre, Welland Road, Upton upon Severn, WR8 0SW. This is an established 2 acre industrial site with very dense screening, situated on the A4104 between Welland and Upton upon Severn; location plan enclosed. It would be eminently suitable as it is not overlooked by residential properties.	This site will be assessed and the results of the assessment included in the background document " <i>Identifying areas of search</i> ".
PQ7-1551	<i>Spar Convenience Stores, Redditch</i>	Land occupied by derelict factory side of Redditch railway station "dry" type waste facility only due to proximity of housing across the track	We have contacted Redditch Borough Council regarding this location. They have informed us that this location is not suitable for a waste use.
PQ10-1712	<i>Mr P Bladon</i>	NIMBY	A methodology has been developed to allow all sites put forward to be assessed.
OR12-1668	<i>Mr Dowty</i>	Ravensbank business park, Redditch Hill and Moor, Pershore	These sites have already been assessed using the Traffic Light Assessment methodology. Both were identified in the consultation document as proposed <i>areas of search</i> .
WR10-1054	<i>Veolia Environmental Services</i>	It is not clear from the Areas of Search plan	This will be clarified.

Reference	Name/Organisation	Area proposed	Officer comments and summary of Traffic Light Assessment
		<p>the precise location of 39 - Stanley Evans Quarry so for the avoidance of doubt I would like to put forward the Veolia Environmental Services site known as Sandy Lane Quarry and Landfill shown outlined in red on the enclosed plan in case this is not location 39.</p> <p>Sandy Lane is an existing sand quarry and landfill site and it also has potential for some form of waste recycling. A planning application for composting is currently being discussed with your colleagues in Development Control.</p>	
PQ26-634	<i>Pershore Town Council</i>	Hill and Moor landfill site. Norton, Worcester.	Hill and Moor landfill site was included as an area of search. The Norton site will be assessed and the results of the assessment included in the background document " <i>Identifying areas of search</i> ".
PQ30-1649	<i>EM Jones</i>	No area should bear the burden of one huge waste facility. Especially if it ruins the landscape of our Worcestershire Villages.	The consultation document identified 58 areas of search which may be suitable for waste management facilities at a variety of scales. Individual proposals will be assessed as they are brought forward.

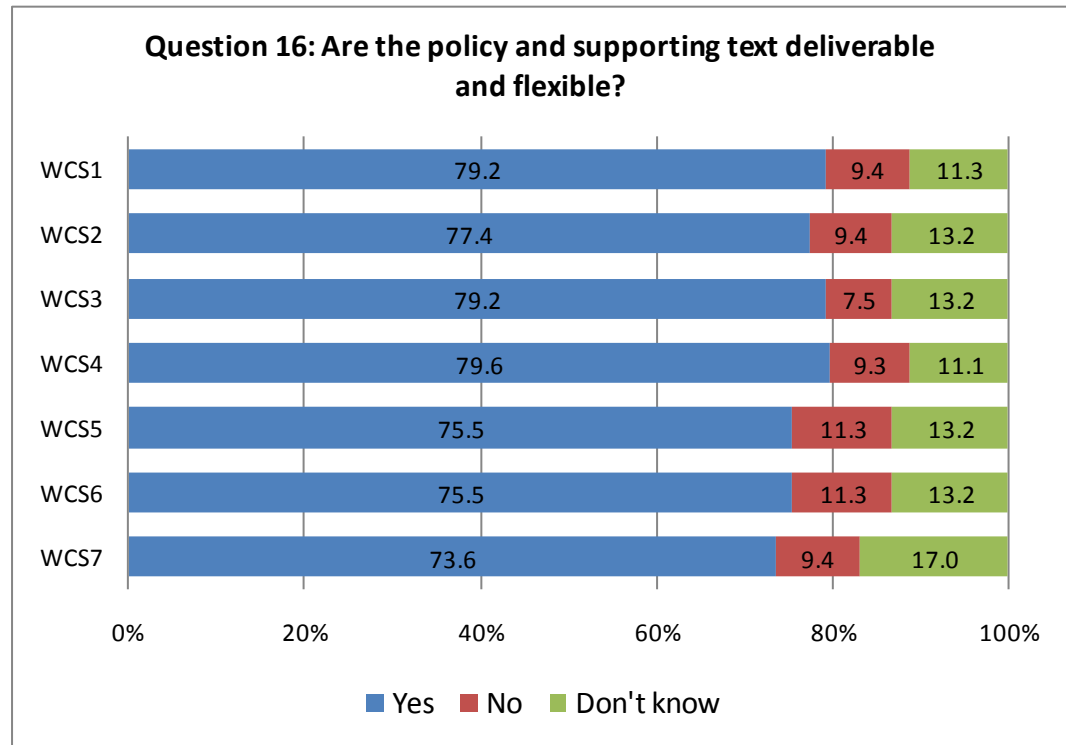
Reference	Name/Organisation	Area proposed	Officer comments and summary of Traffic Light Assessment
PQ35-ANON3	<i>Anonymous</i>	Area close to M5 J6 is an area to be considered	It is not clear what area this comment referred to. We invite further clarification from this respondent.
PQ39-517	<i>Alvechurch Parish Council</i>	None identified at present within Alvechurch parish.	Noted.
PQ43-526 (L)	<i>Beoley Parish Council</i>	Given the above restrictions the choice is obviously limited.	Noted.

Question 15-16: Draft Policy proposals

	Do the policy and the explanatory text respond to local issues and contribute towards the achievement of the vision and objectives?		
	Yes	No	Unsure / Don't Know
WCS1	44	7	3
WCS2	46	5	4
WCS3	49	2	3
WCS4	48	5	2
WCS5	46	6	2
WCS6	52	5	1
WCS7	46	4	3



	Are the policy and supporting text deliverable and flexible?		
	Yes	No	Unsure / Don't Know
WCS1	42	5	6
WCS2	41	5	7
WCS3	42	4	7
WCS4	43	5	6
WCS5	40	6	7
WCS6	40	6	7
WCS7	39	5	9



Reference	Name/Organisation	Summary of comments	Initial officer response
WCS1			
Location of waste management development			
WR4 - 735	The Coal Authority	<p><i>Justified: Yes</i> <i>Effective: Yes</i> <i>Consistency With National Policy: Yes</i></p> <p>The Coal Authority welcomes and supports the suggested 5 stage approach to site selection. Following our comments made in response to the</p>	Support noted.

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>previous Core Strategy in January 2010, this now includes consideration of the presence of coal resources from a mining legacy issue in stage 2. This will ensure public safety and comply with the advice in PPG14.</p> <p>Although mining legacy is as a result of mineral workings it is important that new development delivered through the Local Development Framework, recognises the problems and how they can be positively addressed. Land instability and mining legacy is not a complete constraint on the new development, rather it can be argued that because mining legacy matters have been addressed the new development is safe, stable and sustainable.</p> <p>Recognition is also had at stage 2 to the presence of safeguarded mineral resources which is necessary following advice in MPS1. The presence of safeguarded mineral resources need not be a fundamental constraint if prior extraction can be carried out ahead of the development, this could perhaps be usefully indicated in the text.</p>	<p>Change to be made to make more explicit reference to land instability.</p> <p>Support noted. Reference to prior extraction will be developed.</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
OR2-701	<i>Bruce Braithwaite, Strategic Waste Policy Officer Staffordshire County Council</i>	In respect of WCS1 b(i); 2 (v); 5 b(1); (ii); and (iii) it is impractical and unrealistic to "maximise" these targets in every case and the word "optimise" is a more realistic and achievable requirement. It can always be argued that more could be done and one returns to the old argument between "Best Available Technique" and Best Available Technique Not Entailing Excessive Cost" and "Best Practicable Environmental Option".	Agreed, change to be made.
PQ10-1712	<i>Mr P Blandon</i>	a) Yes Generally	Support noted
OR5-1707	<i>Mr Brett</i>	In general yes, but stage 3 MUST show a realisation of multimodal potential.	The Traffic Light Assessment prioritised locations with multimodal potential. It will be for individual proposals to identify how this can be realised.
WR8-672	<i>White Ladies Aston Parish Meeting</i>	On the whole we approve of your methods for using and identifying areas. However, we do have concerns with many of the categories listed in your Secondary Constraints. (this concern has now become increased by the Japanese Environmental Conference which has just taken place). It would be an irresponsible Council that would endanger conservation areas, geological sites, nature reserves, registered parks and gardens, special wildlife sites, the green belt and battlefields (the latter encouraging environmental tranquillity and continuity for wildlife).	The primary constraints are given priority in national policy. It would not be in accordance with those policies to give secondary constraints features equal weight. Policies WCS 2 and 4 protect all of these features from unacceptable adverse impacts.
PQ24(also WR9) - 1645	<i>Mrs L Brookes</i>	Confusing.	Noted. Change to be made.
WR29-719	<i>Environment Agency</i>	No specific mention is made in the policy relating to how transportation will be kept to a minimum in accordance with objective W07. We feel that this	This will be considered when we refine our approach to this policy.

Reference	Name/Organisation	Summary of comments	Initial officer response
		policy could be made more robust by including this linkage.	
WR32-1624	<i>Wyre Forest District Council</i>	<p>WFDC support the approach outlined in WCS 1. It is imperative that any future developments are assessed against all aspects of the Development Plan, including the District's LDF.</p> <p>WFDC feel that there should be a preference for 'areas of search' to be developed first, with a requirement put onto developers to provide a rationale as to why a proposal could not be suitably accommodated in the areas of search. This could usefully be along the lines of a sequential approach to site selection.</p>	<p>Support noted. Individual applications will be assessed against all aspects of the Development Plan.</p> <p>Noted, this will be considered as we refine our approach to this policy.</p>
PQ39-517	<i>Alvechurch Parish Council</i>	Not convinced that pre-approved areas of search will always be used for future proposals. Latter must be refused if not on agreed area	This aspect of the policy will be strengthened.
PQ29-559	<i>Crowle Parish Council</i>	In current financial climate is this still viable and deliverable?!	The strategy is due to last until 2027 and these issues must still be addressed.
PQ36-688	<i>Herefordshire and Worcestershire Joint Waste Resource Management Forum</i>	WCS 1: Not necessary to include "set out above" in policy (this is clarified at paragraph 4.31 of the reasoned justification). Draft WCS 1 (1st para) is considered to be potentially too permissive when read in isolation. Whilst there is a need to ensure the provision of waste infrastructure to support growth and associated waste arisings, it is evident that the release of land for housing and employment growth may be subject to other significant infrastructure constraints (such as transportation capacity at Worcester). In such instances it should be made clear that provision of waste facilities will have regard to phasing of growth and relevant infrastructure constraints.	The policies in the strategy must be read as a whole, in conjunction with the wider Development Plan.

WCS2

Reference	Name/Organisation	Summary of comments	Initial officer response
Ensuring sustainable waste management development			
OR2-701	<i>Bruce Braithwaite, Strategic Waste Policy Officer Staffordshire County Council</i>	In respect of WCS1 b(i); 2 (v); 5 b(1); (ii); and (iii) it is impractical and unrealistic to "maximise" these targets in every case and the word "optimise" is a more realistic and achievable requirement. It can always be argued that more could be done and one returns to the old argument between "Best Available Technique" and Best Available Technique Not Entailing Excessive Cost" and "Best Practicable Environmental Option".	Agreed, change to be made. Maximise will be changed to optimise.
PQ10-1712	<i>Mr P Blandon</i>	Possibly major problems with enforcement eg iv & v One to factor including! Lack of information/intelligence, personnel & lack of will power to prosecute breaches.	This will be discussed with the council's Monitoring and Enforcement Officer.
OR5-1707	<i>Mr Brett</i>	In IV the top 3 tiers of the energy hierarchy should be addressed as a minimum.	There is an issue of practicability and proportionality. Large developments will be expected to gain at least 10% of energy from renewable supplies in accordance with the sequential approach set out in the energy hierarchy.
PQ19-601	<i>Kempsey Parish Council</i>	WCS2: Does the 1000m ² threshold apply to eg terraced houses? How is point (v) to be policed?	Policy WCS 2 refers to waste management development and therefore does not apply to terraced housing. This will be discussed with the council's monitoring and enforcement officer.
WR8-672	<i>White Ladies Aston Parish Meeting</i>	Overall we do approve of WCS 2 but do have reservations regarding section iii. Is it possible to tighten up the wording? The writer has in mind the recent nightmare occurring in Hungary with the toxic red mud which affected the water supplies to so many countries.	The Environment Agency has been consulted as the pollution control authority to advise on appropriate wording. However, this policy is in accordance with national guidance.
PQ24(also	<i>Mrs L Brookes</i>	Should not breach planning policies or Green Belt	Policy WCS 4 states that facilities will not be

Reference	Name/Organisation	Summary of comments	Initial officer response
WR9) - 1645		restrictions.	allowed where they constitute inappropriate development in locations designated as green belt unless very special circumstances exist.
WR29-719	<i>The Environment Agency</i>	<p>In the conclusion of the 'Flood Risk Assessments in Worcestershire Background Paper' policy criteria for the Waste Core Strategy is set out. These include:</p> <ul style="list-style-type: none"> · <i>Proposals for waste management facilities should demonstrate application of the Sequential Test and if appropriate the Exception Test;</i> · <i>FRAs should be submitted with planning applications in areas of flood risk, for all proposals in Flood Zones 2 and 3 plus those in Flood Zone 1 that are over 1HA;</i> · <i>Policies on how to deal with windfall sites, defining the type of windfall development which would be acceptable in certain flood risk areas and what the broad criteria should be for submitting a planning application under these circumstances; and</i> · <i>Policies to ensure waste management facilities remain safe, covering all sources of flooding, remain operational and no impact on flooding elsewhere.</i> <p>Policy WC2 in the Waste Core Strategy covers</p>	This will be discussed with the Environment Agency.

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>the above (we have made recommendations to alter the text in our response to that document – please see our comments below on this matter), but we feel there should be some more supporting text in paragraph 5.11 of the Core Strategy document, particularly on the following points:</p> <ul style="list-style-type: none"> · There should be no net reduction in flood storage areas or impeding flood flow routes, and developers should seek opportunities to reduce flood risk. · Ensuring the development is safe, this would include the facility itself in making sure it is adequately protected from flooding, and ensuring no pollution occurs elsewhere as a result of flooding and materials being washed elsewhere. Consideration in designing any waste facilities must be given to ensuring the development can be accessed safely in times of flooding, if access can not be achieved then the impacts of not being able to have access to the facility must be understood to inform the decision making process · (In relation to the 2nd bullet point in the background paper) Site specific FRAs should also be required for sites with ordinary watercourses in /adjacent and where the SFRA has unidentified other sources of flooding. (This is because our flood zone maps may not show other 	

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>sources of flooding or where an ordinary water course has not been mapped, so where relevant the SFRA should be referred to.)</p> <p>Paragraph 5.11 should also make reference to the need for new development to include SuDS or drainage systems that can deal with high levels of rainfall and do not result in either deterioration in water quality or pollution being discharged into local watercourses. It is referred to in paragraph 7.21, but should also be reference d in paragraph 5.11.</p> <p>We recommend the following alterations (these include some deletion as well as <u>additions</u> which are underlined) to part iii of policy WCS2:</p> <p>iii. that they will not adversely contribute to flood risk and will remain safe and operational during flooding events. It will be expected that all proposals will be based on the Sequential Test locating development in Flood Zone 1 where possible. <u>Where following the sequential test development is proposed outside of Flood Zone 1 then the Exception test may be required and in all cases development will need to be accompanied by a Flood Risk Assessment assessing all types of flooding, including the impacts on the development, to others and climate change implications. Development should be in accordance with the Strategic Flood Risk Assessment for the relevant area.</u></p>	
WR29-719	<i>Environment Agency</i>	Again, no specific mention is made in the policy	The spatial strategy is to locate facilities close

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>relating to how transportation will be kept to a minimum in accordance with objective W07. We feel that this policy could be made more robust by including this linkage.</p> <p>We acknowledge paragraph 6.5 but consider that Site Waste Management Plans could be referred to in this policy as well.</p> <p>(Please also see our comments and recommended alterations on this policy in the flood risk section above.)</p>	<p>to waste arisings, resource demand and end users in order to reduce waste miles. This will be clarified. The strategy must be read as a whole and transport is addressed elsewhere.</p> <p>The strategy must be read as a whole and this issue is addressed elsewhere. Our approach to this will be reviewed following recent government guidance</p> <p>Noted.</p>
WR30-716	<i>English Heritage</i>	<p>With regard to Policy WCS2 we recommend that point (ii) is amended to reflect the Vision and objectives and to respond to local issues by the inclusion of a specific reference to the historic environment and heritage assets (in accordance with PPS5). We recommend the following amendment: ‘..locally important natural and <i>cultural resources, including landscape, biodiversity, heritage assets, ...</i>’.</p> <p>We also recommend that point (v) includes strengthened encourage for the reuse of existing buildings in the first instance in conjunction with maximising the use of reused or recycled materials.</p> <p>Following on from these recommendations, we consider that the text at 5.7 and Figure 17 requires further expansion for both matters of consistency and comprehensiveness.</p>	<p>This will be considered in refining our approach to this policy.</p> <p>This will be considered in refining our approach to policy WCS 4.</p> <p>Noted and agreed.</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>We recommend that the sub-heading for 5.6 is amended as '<i>Protection and Enhancement of Natural Resources and Cultural Resources</i>'.</p> <p>With regard to Figure 17 our comments under questions 11 and 14 are relevant with regard to the accuracy of diagrams 10, 11 and 12. The figure includes boxes on conservation areas and listed buildings.</p> <p>To be comprehensive in terms of heritage assets, an alternative approach could be to include a box on designated heritage assets, so allowing for the inclusion of other assets such as scheduled Monuments and their settings, Registered Parks and Gardens, Registered Battlefields. An accompanying box can then also be added on locally important heritage assets and cross referring to the Historic Environment Record (this including the county based mapping on historic farmsteads. To the box on the Worcestershire LCA we recommend that a reference is also made to the Worcestershire historic landscape characterisation.</p> <p>Additional text could also be added on possible approaches to the enhancement of the historic environment, for example this could involve contributing to the improved maintenance and management of a heritage asset, the appropriate reuse of a historic building, or improved access and interpretation.</p> <p>For the section on construction methods (5.16) we recommend that the text includes reference to the</p>	<p>Noted and agreed.</p> <p>Noted and agreed.</p> <p>Reference is made to the protection and enhancement of these assets. This will be a matter to be addressed as individual proposals are brought forward and will be considered in line with the wider Development Plan and national policy.</p> <p>Noted and agreed.</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
		benefits of reusing existing buildings to minimise construction waste – this is supported by PPS5 under Policy HE1 Heritage Assets and Climate Change (...’keeping heritage assets in use avoids the consumption of building materials and energy and the generation of waste from the construction of replacement buildings’).	
WR32-1624	<i>Wyre Forest District Council</i>	WFDC support the thrust of Policy WCS 2 which seeks to ensure that waste is dealt with in the most sustainable way. The principles in this policy appear to align with the objectives and policies of the District’s Core Strategy, specifically CP01: Delivering Sustainable Development Standards.	Support noted.
PQ36-688	<i>Herefordshire and Worcestershire Joint Waste Resource Management Forum</i>	A very minor note - Policy WCS 2 point four should quote figure 18 not 17.	Noted, change to be made.
PQ36-688	<i>Herefordshire and Worcestershire Joint Waste Resource Management Forum</i>	We particularly welcome WCS 2 iii requiring developments to demonstrate how they will remain operational during episodes of flooding.	Support noted.
WCS3			
Managing waste arising from all new development			
PQ10-1712	<i>Mr P Blandon</i>	See above eg 6.8 what will be done if new development don't bother to comply.	This will be discussed with the district councils.
WR8-672	<i>White Ladies Aston Parish Meeting</i>	Approve.	Support noted.
PQ24(also WR9) - 1645	<i>Mrs L Brookes</i>	Confusing.	Noted. Further guidance to be provided on ADEPT standards.
WR29-719	<i>Environment Agency</i>	We welcome the inclusion of Site Waste Management Plans in this section.	Our approach will be reviewed following recent government guidance.
WR32-	<i>Wyre Forest District</i>	WFDC are generally supportive of this policy.	Support noted.

Reference	Name/Organisation	Summary of comments	Initial officer response
1624	<i>Council</i>	The principles in this policy appear to align with the objectives and policies of the District's Core Strategy, specifically CP01: Delivering Sustainable Development Standards and is considered to be mutually reinforcing.	
PQ36-688	<i>Herefordshire and Worcestershire Joint Waste Resource Management Forum</i>	Welcome inclusion of this policy following abolition of RSS. Support for paragraph 6.9 of the reasoned justification relating to Waste Management Plans.	Support noted.
PQ41-1623	<i>Wychavon District Council</i>	<p>Whilst appreciating the purpose and intentions behind this policy there are two issues that it raises:</p> <p>i) First reference to "all new development" and to what level of development this should apply. It is suggested that clarification is provided, perhaps relating to a threshold of development otherwise there is the potential requirement to demonstrate how waste material is to be recycled, e.g. for a porch or modest extension.</p> <p>ii) Second the District Council would need to look for contributions, rather than on-site facilities in certain circumstances and it is suggested this should be referred to as a possibility within the policy.</p>	These issues will be considered when refining our approach to this policy.
PQ36-688	<i>Herefordshire and Worcestershire Joint Waste Resource Management Forum</i>	Be aware of development viability issues. Note the reference to waste management facilities to be incorporated into all development. Is this realistic?	These issues will be considered when refining our approach to this policy.
PQ37-1622	<i>Worcester City Council</i>	Presumably there will be an up-front 'waste statement' accompanying an application. If so, a) As local lists of requirements for applications need to be revised by 10 December 2010. Has there	These issues will be considered when refining our approach to this policy. We will be meeting with DC managers to discuss these issues.

Reference	Name/Organisation	Summary of comments	Initial officer response
		been a discussion with the DC managers to agree a strategy for rolling out the requirement? b) if an application fails or refuses to submit a scheme and the application is not validated, what role will WCC play in defending an appeal against non-determination? c) Will WCC provide the expertise as a consultee in assessing such statements? Paragraph 6.5 needs to be looked at to give clarification particularly in regard to size. Would a guidance note SPD be produced in due course as a guide to developers etc?	
WCS4			
Managing the impact of new waste management development			
PQ10-1712	<i>Mr P Blandon</i>	Needs improving significantly eg development proposals will not under any circumstances be allowed where these criteria are not fully met unless there are very exceptional circumstances etc...those affected will be awarded very substantial compensation etc.	The draft policy is in accordance with government policy. Policy WCS 4 states "development proposals will not be allowed where these criteria are not met unless exceptional circumstances are clearly justified".
OR5-1707	<i>Mr Brett</i>	In IX add at end of first sentence ".....which they shall be required to use"	Policy WCS 4 will be updated to consider this.
OR6-800	<i>Herefordshire & Worcestershire Earth Heritage Trust</i>	WCS 4 is welcomed, especially as it recognises the importance of Local Sites Systems (Special Wildlife Sites and Local Geological Sites) within the context of non-statutory designations and ensuring that their features are conserved or enhanced during any development.	Support noted.
WR8-672	<i>White Ladies Aston Parish Meeting</i>	Approve - however, what would the County Council assume as "unacceptable" as set out in sections vii and viii. Also please explain "exceptional circumstances". What are these?	Applications will be assessed against national and local planning policies and other material considerations and each application will be considered on its own merits.
PQ24(also WR9) - 1645	<i>Mrs L Brookes</i>	Confusing.	Noted.

Reference	Name/Organisation	Summary of comments	Initial officer response
WR27-740	<i>Cotswolds Conservation Board</i>	Sub paragraph (v) should make clear that proposals outside the designated AONBs should have no significant detrimental impact on their special qualities. The boards position statement on development in the settings of the Cotswolds AONB gives guidance on this issue.	Supporting text and policy text will be expanded to clarify this.
WR29-719	<i>Environment Agency</i>	We welcome part vi. of this policy and consider this to be robust. However in the supporting text we would like to see reference made to current Environment Agency Groundwater Protection Guidance.	Noted and agreed. This will be clarified.
WR30-716	<i>English Heritage</i>	<p>With respect to Policy WCS4 we recommend that for clarity the third bullet point under criterion (iv) is amended as follows: <i>'the historic environment and heritage assets, including archaeology, buildings, areas and landscapes and their settings'.</i></p> <p>To be consistent with the policy we recommend that the supporting text at 7.7 is expanded to also emphasise the importance of having regard to potential impacts on non designated and locally valued heritage assets in accordance with PPS5. This can be linked to encouraging referencing to the County Historic Environment Record and the Historic Landscape Characterisation and supporting studies such as the series of Historic Environment Assessments prepared by the County Council (prepared as part of the evidence base for the local development frameworks for South Worcestershire, Redditch, Bromsgrove).</p> <p>Under paragraph 7.12 an additional relevant reference is the Worcestershire Historic</p>	<p>Noted and agreed. This will be considered in our approach to refining this policy.</p> <p>Change to be made.</p> <p>Noted, change to be made.</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
		Farmsteads Summary Report. For further information on these the county contact is Adam Mindykowski.	
WR32-1624	<i>Wyre Forest District Council</i>	WFDC support this policy, which seeks to ensure that the impacts of new waste management proposals are mitigated against and to not allow development where these criteria are not met.	Support noted.
PQ36-688	<i>Herefordshire and Worcestershire Joint Waste Resource Management Forum</i>	Support the increased remit and strengthening of the policy.	Support noted.
PQ37-1622	<i>Worcester City Council</i>	Amendments deleting 'region' in main document need to be changed in the summary.	Noted, clarification is currently being sought.
PQ38-1679	<i>Axis (on behalf of Mercia Waste Management)</i>	iv) change 'contribute positively' to 'have no unacceptable impact on'; v) needs re-writing as current wording is unclear that it only relates to the AONBs (as opposed to local landscapes); x) Delete as the criterion is completely inconsistent with the land uses identified in Table 6 of the emerging WCS.	Come back to this Noted, change to be made. This will be considered as we refine our approach to this policy.
PQ36-688	<i>Herefordshire and Worcestershire Joint Waste Resource Management Forum</i>	Bullet point iv) is it necessary to say both historic environment and heritage assets - historic environment encompasses heritage assets as per PPS5?	This will be considered as we refine our approach to this policy.
WCS5			
Recovering energy from waste material			

Reference	Name/Organisation	Summary of comments	Initial officer response
OR2-701	<i>Staffordshire County Council</i>	In respect of WCS1 b(i); 2 (v); 5 b(1); (ii); and (iii) it is impractical and unrealistic to "maximise" these targets in every case and the word "optimise" is a more realistic and achievable requirement. It can always be argued that more could be done and one returns to the old argument between "Best Available Technique" and Best Available Technique Not Entailing Excessive Cost" and "Best Practicable Environmental Option".	Agreed, change to be made. Maximise will be changed to optimise.
PQ10-1712	<i>Mr P Blandon</i>	Generally OK	Support noted
OR5-1707	<i>Mr Brett</i>	In ii add "... and conforms with international best practice for energy recovery.	Consideration will be given to the concept of best practice to support this policy.
OR9-899	<i>Thomas Vale Construction</i>	Where energy from waste contracts are sought, provision must be made to ensure the ongoing reduction in waste, and to ensure Worcestershire does not have to import waste to feed an EFW plant. WCS5 - must explicitly state the requirement for recovery of electricity and heat.	Policy WCS 5 requires the sorting of waste to be carried out to ensure that resource recovery and recycling are maximised. It also requires for energy recovery to be maximised. It would therefore be inappropriate to limit the operation of facilities by specifying where the waste may come from. To specifically require electricity and heat does not allow for technology changes which may result in energy recovery being maximised in other ways.
PQ24(also WR9) - 1645	<i>Mrs L Brookes</i>	Confusing.	Noted.
WR27-740	<i>Cotswolds Conservation Board</i>	Should indicate that schemes to generate energy from agricultural waste should not rely on the importation of material from off the holding.	The Waste Core Strategy only considers Directive Waste. Some treatment of agricultural waste can be Permitted Development; the Waste Core Strategy does not seek to change this. Any other proposals would be assessed as they are brought

Reference	Name/Organisation	Summary of comments	Initial officer response
			forward.
WR29-719	<i>Environment Agency</i>	We support the new wording of this policy. It addresses the issues raised in earlier correspondence and is worded such as not to preclude latest developments in Energy Recovery Development and is not simply limited to the combustion of landfill gas.	Support noted.
WR32-1624	<i>Wyre Forest District Council</i>	This policy (WCS5) provides an extra level of detail for this specific type of management facility and is welcomed. This policy seeks to provide more detail on the process of energy from waste. WFDC consider that the policy could also usefully make reference to the need to have regard to the other policies of the Development Plan, especially with regard to WCS4.	Support noted. Change to be made to refer to the Development Plan at the beginning of the document.
PQ26-634	<i>Pershore Town Council</i>	Yes provided no pollution.	The Strategy seeks to address this. However, the Environment Agency also has a role to play as the pollution control authority.
PQ38-1679	<i>Axis (on behalf of Mercia Waste Management)</i>	ii) change to 'energy recovery is maximised as far as practicable'. Paragraph 8.5 fundamentally misunderstands CHP, the nature of England's energy distribution system and the economics & practicality of heat off-take / use. Firstly CHP means electricity and heat and in some instances it will be preferable to only recover one or the other (e.g. heat only off-take is far more efficient and maximises energy recovery over any CHP solution). Secondly, there is no material benefit in serving local users as a preference; particularly as in most instances electricity export will be to the 'grid' and	Supporting text will be reviewed. Noted, this will be considered as we refine our approach to this policy. Noted, this will be considered as we refine our approach to this policy.

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>its use cannot be tracked.</p> <p>Thirdly the statement that energy recovery must be maximised is imprecise i.e. at what economic and environmental cost must it be maximised?</p> <p>The principal policy context relating to energy efficiency is contained in the revised Waste Framework Directive (rWFD), which is due to be transposed into the UK in December 2010. It includes specific definitions of “disposal operations” and “recovery operations”. The latter term being applied to facilities which achieve a certain level of energy efficiency. This issue of energy efficiency has recently been the subject of consultation in respect of the transposition. In Defra’s Stage Two: Consultation on the transposition of the revised Waste Framework Directive (Directive 2008/98/EC) [July 2010], it states:</p> <p>2.189 As to the revisions, Article 23(4) of the rWFD requires that it shall be a condition of any permit covering incineration or co-incineration with energy recovery that the recovery of energy takes place with a high level of energy efficiency. This provision was the subject of an exchange of correspondence between the UK and the European Commission before the rWFD’s formal adoption. The UK’s letter to the Commission set out the following view:-</p> <p>“The UK’s conclusion, therefore, is that the effect of Article 23(4) is to require the competent authority (a) to ensure that an individual assessment is conducted for each existing or new</p>	<p>Noted, this will be considered as we refine our approach to this policy.</p> <p>Noted, this will be considered as we refine our approach to this policy.</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>incineration and co-incineration facility with energy recovery; and (b) to set in the permit for that facility a condition which determines, in the context of each particular plant, what constitutes a high level of energy efficiency for that particular facility. In other words, it is the UK's view that Article 23(4) is a subjective test rather than an absolute test in the sense of the energy efficiency threshold set in the R1 formula for 'incineration facilities dedicated to the processing of municipal solid waste only'." [n.b. this definition of municipal waste should be read in conjunction with Defra's proposal that it constitutes: "waste from households, as well as other waste which, because of its nature or composition, is similar to waste from households"]</p> <p>2.190 The Commission response was as follows:- "Finally, I would like to confirm that it is the Commission's interpretation that Article 23(4) of the revised Waste Framework Directive does not impose an absolute threshold of energy efficiency, and in particular it does not imply that all waste incineration and co-incineration with energy recovery should meet the threshold specified in Annex II ('R1 formula'). The latter threshold aims to allow classification of certain efficient municipal solid waste incinerators as recovery operations." This latest government position (accepted / amplified by the EU Commission) indicates that:</p> <ul style="list-style-type: none"> • Energy efficiency should be dealt with at the (Environmental) Permitting stage; • Energy efficiency should be assessed for each new incinerator; • Energy efficiency should be dealt with by 	

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>condition in the context of each particular plant;</p> <ul style="list-style-type: none"> • An incinerator need not meet the energy efficiency threshold set in the R1 formula; • Any incinerator meeting or exceeding the R1 threshold can be classified as efficient and its operations are recovery. <p>Furthermore the matter of the identification of potential heat users and the feasibility / viability of heat off-take is complex and not adequately supported by current legislative and fiscal policy. This is evidenced by the fact that the UK only has three EfWs that presently distribute material quantities of heat and two of these (Nottingham and Sheffield) were reconstructed on former incinerator sites specifically to serve existing district heating schemes that had been installed many years previously. The problems in delivering heat offtake have been recognised by central government who are in the process of developing new policies, most notably in February 2010 the Department for Energy and Climate Change (DECC) published a consultation document on the proposed introduction of a Renewable Heat Incentive (RHI). This is a significant piece of legislation which may have a large impact on future renewable projects. The consultation lacks much detail, but does provide a way forward to encourage the development of renewable heat. It lays out ground rules for the interaction of the Renewable Obligation for electricity and renewable heat, and attempts to remove some of the inconsistencies introduced in the Renewables</p>	

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>Obligation regarding CHP. The RHI encompasses the government's financial incentive framework for increasing the levels of renewable heat generation, as part of their overall UK Low Carbon Transition Plan. It will sit alongside the existing Renewables Obligation for power generation and Feed-In-Tariffs for small scale generation. The RHI is intended to come into force from April 2011 and will cover England, Scotland and Wales. The initiative is based around a tariff system, providing a fixed rate financial incentive per unit of renewable heat generated (and utilised). However, the RHI is far from finalised. In light of the above, paragraph 8.5 should be re-written as follows:</p> <p>Where energy is recovered from waste it is clearly beneficial that this is done as efficiently as is practicable. Thus, the location of facilities will be influenced by how best to maximise energy recovery, either at the present time or in the future. This will be a material planning consideration. However, the energy efficiency of any particular waste development will ultimately be defined at the Environmental Permitting stage.</p>	
PQ34-676	<i>Wolverley and Cookley Parish Council</i>	This should be a priority to maximise energy recovery and the development of a waste management industry	Support noted.
PQ36-688	<i>Herefordshire and Worcestershire Joint Waste Resource Management Forum</i>	We would wish to see 8.4 expanded to make clear that this includes source separation, in particular where household waste is presented and collected as separate dry recyclable and residual fractions. The requirement for maximum recovery of energy and materials may not be easily met, if this will require unreasonable	This policy requires treatment of waste in accordance with the waste hierarchy. It is for the applicant to demonstrate that sorting has been carried out to maximise resource recovery and recycling. Sorting can be undertaken on-site or elsewhere.

Reference	Name/Organisation	Summary of comments	Initial officer response
		investment then necessary infrastructure development may not happen.	
PQ41-1623	<i>Wychavon District Council</i>	Draft explanatory text: The text should make reference that AD plants on farms with suitable road access should be supported if they can demonstrate that they are using waste created on the farm and/or using the AD by product such as electricity, CO2 and soil enhancer to benefit the farming/horticultural activity.	The policy provides for the consideration of such proposals, however the strategy is not technology specific. The background document " <i>Energy from Waste</i> " considers the benefits of AD. The Waste Core Strategy only considers Directive Waste. Some treatment of agricultural waste can be Permitted Development; the Waste Core Strategy does not seek to change this. Any other proposals would be assessed as they are brought forward.
WCS6 Landfill			
PQ4-337	<i>Ashland UK Ltd, Kidderminster</i>	No exceptions should be made to landfill.	There may be circumstances where landfill is essential for operational reasons, for example the restoration of mineral workings and for a small amount of waste there is currently no alternative to landfill. However the Waste Core Strategy will encourage the movement of waste up the waste hierarchy.

Reference	Name/Organisation	Summary of comments	Initial officer response
OR2-701	<i>Staffordshire County Council</i>	<p>WCS6 a (ii) There may be "safety" reasons as well as "operational" reasons why it may be desirable to infill former mineral workings e.g. to reduce the pitch of slopes so that they do not present a temptation to climb or to infill impermeable depressions so that they do not hold water and encourage swimming in dangerous conditions.</p> <p>WCS 6 b It is only appropriate to recover energy from landfill if it contains "biodegradable" waste and this should be reflected in the policy.</p>	<p>Agreed, change to be made to include safety.</p> <p>Agreed, change to be made.</p>
PQ10-1712	<i>Mr P Blandon</i>	Generally OK	Support noted
PQ18-618	<i>Malvern Wells Parish Council</i>	No - No mention made of a requirement for aquifer or surface water protection from pollution	This is addressed in Policy WCS 4.
WR8-672	<i>White Ladies Aston Parish Meeting</i>	We endorse the intention of no further planning for landfill. However, we trust that any proposal for such a site will ensure that the toxins in any build up of liquid do not have the opportunity to leach through the soil and poison local groundwater systems. We believe that section "c" is not strong enough in emphasising the need to protect local water courses.	Impact on watercourses is addressed in Policy WCS 4. The Environment Agency is the pollution control authority and will be consulted on all applications as well as being responsible for issuing Environmental Permits for landfill sites.
PQ24(also WR9) - 1645	<i>Mrs L Brookes</i>	Confusing.	Noted.
WR29-719	<i>Environment Agency</i>	The policy fails to accord with the strategy's underpinning objectives. Whilst we note it is considered unlikely that new landfill sites will be required given the capacity forecasts and the wording is such that it acts as a last resort measure, this does serve to question the need for its inclusion in the first place.	Although we do not promote or seek to make specific provision for landfill capacity, the strategy must include policies to assess proposals if they are brought forward.

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>However, if you feel the policy is necessary to afford the document some flexibility, we strongly recommend that the wording is made more robust and the word “or” is replaced by “and” in-between the policy wordings criteria in part a (in line with our earlier communication).</p> <p>Furthermore, there are contradictory references made with regards to landfill requirement throughout the document. We feel the document would benefit from some consistency and transparency relating to the need associated with future landfill sites and that this should permeate throughout the strategy.</p>	<p>There may be operation or safety reasons where landfill becomes necessary.</p> <p>Changes will be made to clarify this situation.</p>
WR32-1624	<i>Wyre Forest District Council</i>	WFDC support Policy WCS6 as a useful tool in preventing and limiting unnecessary new landfill sites. This provides the focus for ensuring techniques are developed that recycle and re-use waste and do not focus on landfill	Support noted.
WCS7			
Impact of new development on existing or proposed waste management facilities			
OR2-701	<i>Staffordshire County Council</i>	WCS 7 b I think that the real objective here is to protect the established waste management operation from complaints from new residents about established activities and I am not sure this is what the wording achieves. It appears to protect the new residents not the established use.	Noted, wording to be reassessed. The policy aims to reduce conflict between users.
PQ10-1712	<i>Mr P Bladon</i>	Increase distance. Only 250 Metres! 500m would be better	Noted. At present the Environment Agency requires bio-aerosol assessments where waste sites handling biodegradable waste are within 250m of sensitive receptors. This has been used to inform the distance of this buffer zone.

Reference	Name/Organisation	Summary of comments	Initial officer response
WR8-672	<i>White Ladies Aston Parish Meeting</i>	Again, the words "acceptable" and "adversely" are a little woolly.	Applications will be assessed against national and local planning policies and other material considerations and each application will be considered on its own merits.
PQ24(also WR9) - 1645	<i>Mrs L Brookes</i>	Confusing.	Noted.
WR29-719	<i>Environment Agency</i>	No comment.	Noted.
WR32-1624	<i>Wyre Forest District Council</i>	<p>The Council are concerned about this policy. It is considered that setting an arbitrary zone around existing or permitted waste management facilities places an onerous burden on developers. It is recommended therefore that this could be usefully re-branded as a 250m consultation zone so that any issues with regard to affects on the waste facility would still be captured and mitigated through consultation with Environmental Health Officers and the Environment Agency.</p> <p>The Council are supportive of this mapping facility as a useful tool for implementing the policy. It should be noted however, that the site on Bewdley Road, Stourport is no longer operational and is subject to development pressure for residential development.</p>	<p>Noted and agreed. Change to be made to refer to "consultation zone".</p> <p>The web-tool will continue to show all sites with current use rights for waste management purposes as it is possible that the use could be re-established.</p>
PQ36-688	<i>Herefordshire and Worcestershire Joint Waste Resource Management Forum</i>	Note that a webtool has been developed to support Policy WCS 7 which maps all known waste sites in the County with a 250m buffer.	Noted.
PQ37-1622	<i>Worcester City Council</i>	<p>(Answer don't know) B</p> <p>A. The principle of safeguarding interests is legitimate, but it must not fetter development by safeguarding sites that do not have reasonable</p>	<p>Noted.</p> <p>This does not prevent development within the identified zone but ensures that potential conflict would be taken into account. Change</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>expectation for implementation within the foreseeable future. Therefore it will be important for WCC to demonstrate that the sites being put forward are required, will deliver the objectives of the Plan and other associated Strategies, are economically viable, will be implemented within a specific timeframe and will, in themselves, not result in demonstrable harm to recognised interests.</p> <p>B. there follows the question as to when in the process it is envisaged to safeguard a site. Presumably WCC has / will take advice on when it is legitimate to safeguard.</p> <p>C. Presumably there will be a requirement for upfront submission. The comment regarding local lists applies (WCS3).</p> <p>D. What role will WCC play in the consultation stage of the application? There is the presumption that WCC will give a comprehensive response on the suitability of any submitted mitigation measures.</p>	<p>to be made to refer to "consultation zone".</p> <p>This policy will be revised. It will only apply to sites with current use rights for waste management purposes.</p> <p>Noted, this will be discussed with County and District Councils Development Management group..</p> <p>Worcestershire County Council's role in this will be clarified, in some cases technical advice will be needed from the Worcestershire Environmental health/regulation team</p>
PQ41-1623	<i>Wychavon District Council</i>	<p>It is noted that a criteria of 250m of an existing or proposed waste management facility is set out in the policy. This may have practical implications where waste management facilities are eventually to be identified on employment sites and granting permission for new employment development. This could effectively 'blight' some of the areas with employment locations, e.g. extension to Vale Park, Evesham.</p>	<p>This does not prevent development within the identified zone but ensures that potential conflict would be taken into account. Change to be made to refer to "consultation zone".</p>

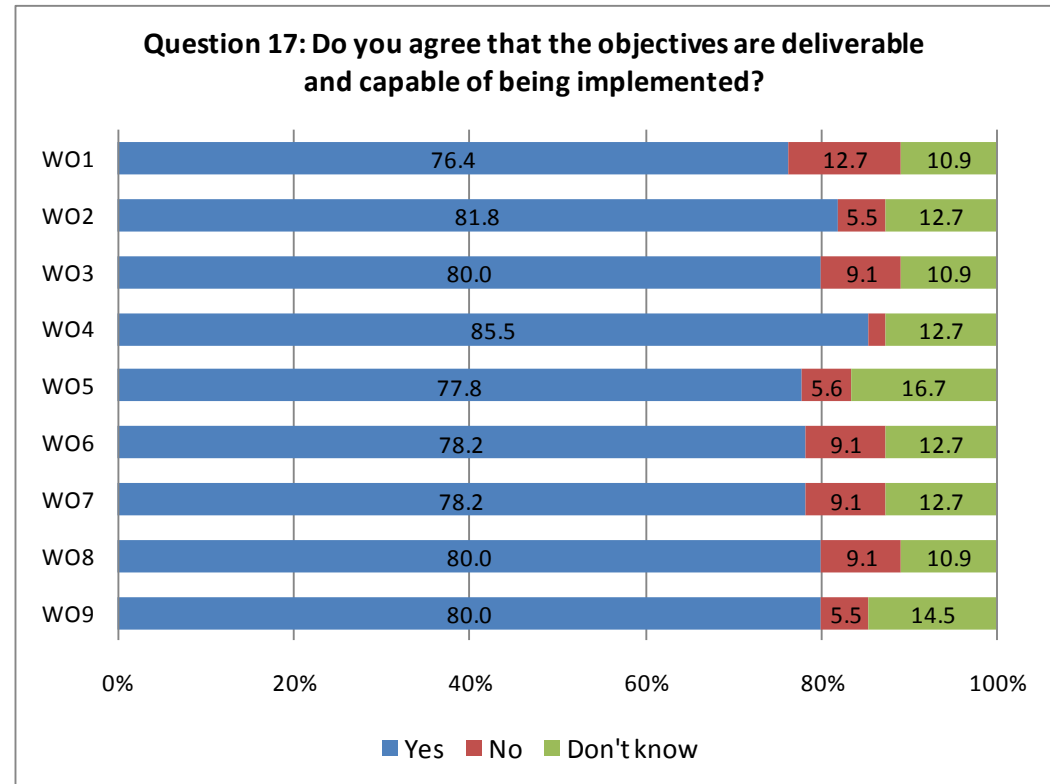
Reference	Name/Organisation	Summary of comments	Initial officer response
		The supporting text is amended to reflect the concerns raised above.	
PQ27-1598	<i>Elgar Foods Ltd</i>	(Answer don't know) 250m sufficient	Noted.
PQ36-688	<i>Herefordshire and Worcestershire Joint Waste Resource Management Forum</i>	We are concerned that WCS7 does not extend to protecting identified areas of search and feel that consideration should be given to this as well as established sites.	Potential conflicts will depend on the type of waste management facility and the details of the proposed development. It is therefore not considered useful to extend the policy to cover areas of search.
General			
OR12-1668	<i>Mr Dowty</i>	Incineration is NOT renewable energy. The waste contractor is calling it renewable energy as it is burning FOOD WASTE which could have been composted or treated via anaerobic digestion. The JWMCS needs to be reviewed in line with increased recycling rates and the financial penalties involved if not enough waste is generated to feed an incinerator. Also over time more and more types of waste can be recycled e.g. 5 years ago batteries could not be recycled. Developments in technology will mean that waste can be treated in an efficient manner in the future. They are not flexible as they do not take into account significant increases in recycling and changes to government policy e.g. to reduce CO2 emissions. Also commercial and industrial waste needs to be recycled in the same way as municipal solid waste - this again would enable a significant amount of waste to be recycled and diverted away from landfill.	The Waste Core Strategy is not technology specific and does not propose incineration. In accordance with policy WCS 5, any proposals would need to maximise recycling, resource recovery and energy recovery. The Waste Core Strategy has remained intentionally flexible to allow new technologies to emerge.
OR8-625	<i>Norton & Lenchwick Parish Council</i>	Don't know because this is starting to get very confusing for the lay person to give any opinion	Noted. The Waste Core Strategy is necessarily complex but summary documents were produced in order to simplify the content

Reference	Name/Organisation	Summary of comments	Initial officer response
			as much as possible. We will try to make the final document as clear as possible.
PQ42-717 (L)	<i>Natural England</i>	Clear links to achievement of vision and objectives. We particularly like the reference to which objective the policy is delivering. Local issues are likely to be more varied but WCS 2 makes provision for local community consultation and thus should allow the means to identify and scope how such issues might be addressed.	Support noted.
PQ30-1649	<i>EM Jones</i>	This Joint Waste Management Strategy should NOT be adopted until Worcestershire County Council is more in control of an intelligent flexible strategy and less under the control of a multi billion pound company. The reasons for Estech not securing a contract and therefore not being able to deliver an autoclave as had been applied for are VERY FEEBLE and the reason cited was 'lack of outlet for the fibre' when there are a whole variety of outlets but NONE at the moment or very little for INCINERATOR ASH.	The Joint Municipal Waste Management Strategy is not the subject of this consultation and has been adopted by the 8 councils in Herefordshire and Worcestershire. We have no information about these private contractual matters.
PQ35-ANON3	<i>Anonymous</i>	(Q16 - Answer no to all policies) Deliverable but not acceptable.	It is not clear what this comment referred to. We invite further clarification from this respondent.
PQ40-610	<i>Lindridge Parish Council</i>	(Answer yes to all) But dependent upon sustained political will and, for some aspects positive collaboration between County and District Councils. Perhaps easier to ensure deliverability in a Unitary Authority context!??	Noted. This is outside the remit of the Waste Core Strategy.
PQ42-717 (L)	<i>Natural England</i>	Care has been taken to respond to the issues raised in the emerging options consultation, to target more in order to make delivery easier. An example of this is in the text above paragraph 5.1.	Support noted.

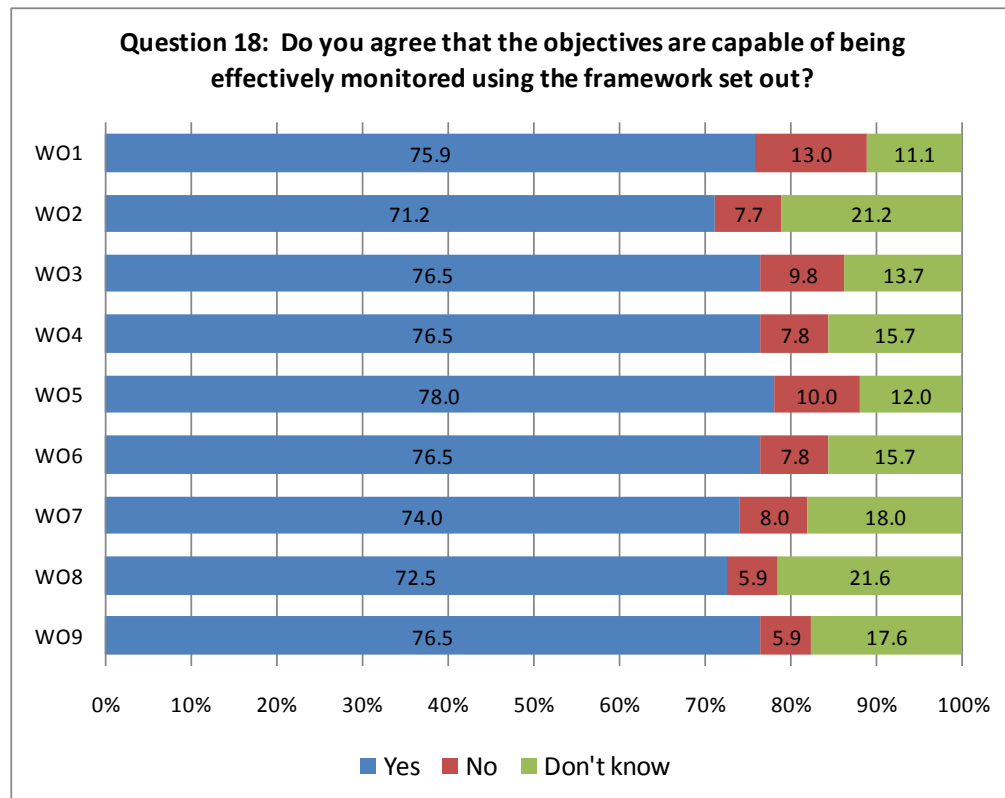
Reference	Name/Organisation	Summary of comments	Initial officer response
PQ44-608 (L)	<i>Lickey and Blackwell Parish Council</i>	<i>(Answer don't know to all)</i> As a parish council we do not have the knowledge / expertise to make a judgement	Noted.
OR16-547	<i>Chaddesley Corbett Parish Council</i>	Together, they represent an 'ideal' situation. Tensions will almost certainly arise when assessing individual proposals.	Noted. Policy WCS 2 includes part vii which states that proposals must demonstrate "that they consult and involve the local community prior to the application being made" which should enable discussion between developers and the local community. Individual applications will also be subject to further consultation.

Question 17-18: Implementation and Monitoring Framework

	Do you agree that the objectives are deliverable and capable of being implemented?		
	Yes	No	Unsure / Don't Know
WO1	42	7	6
WO2	45	3	7
WO3	47	5	6
WO4	47	1	7
WO5	42	3	9
WO6	43	5	7
WO7	43	5	7
WO8	43	5	6
WO9	43	3	8



	Do you agree that the objectives are capable of being monitored using the framework set out?		
	Yes	No	Unsure / Don't Know
WO1	41	7	6
WO2	37	4	11
WO3	39	5	7
WO4	39	4	8
WO5	39	5	6
WO6	40	4	8
WO7	37	4	7
WO8	37	3	11
WO9	39	3	9



Reference	Name/Organisation	Summary of comments	Initial officer response
WO1			
To base our decisions on the principles of sustainable development and the need to reduce greenhouse gas emissions and to mitigate climate change			
PQ7-1551	<i>Spar Convenience Stores, Redditch</i>	It may be more expensive to recover the energy than it is worth	To deliver this objective the policies have remained deliberately flexible and the

Reference	Name/Organisation	Summary of comments	Initial officer response
			measures used are expected to be commensurate to the scale of the development.
PQ10-1712	<i>Mr P Blandon</i>	Monitoring: Only if sufficient funding, resources, personnel, etc are available.	Agreed. Monitoring is a fundamental part of the strategy and an Annual Monitoring Report will be produced. All the proposed monitoring indicators for this objective can be collected by the County Council's own staff.
PQ24(also WR9) - 1645	<i>Mrs L Brookes</i>	Dont build an incinerator this will help drastically Herefordshire should deal with its own waste.	The Waste Core Strategy is not technology specific and does not propose an incinerator.
PQ35-ANON3	<i>Anonymous</i>	(Q18) Past records demonstrate failure	It is not clear what this comment referred to. We invite further clarification from this respondent.
PQ36-688	<i>Herefordshire and Worcestershire Joint Waste Resource Management Forum</i>	May wish to include an indicator monitoring the number of facilities on existing land uses i.e. The % change of waste management development on: <ul style="list-style-type: none"> • sites with current use rights for waste management purposes, • active mineral workings or landfill sites, • industrial land, • contaminated or derelict employment land, • land within or adjoining a sewage treatment works, • redundant agricultural or forestry buildings or their curtilage. 	We think this could have merit and will be considered in developing the monitoring schedule. Data on existing facilities may be difficult to obtain, the site may for example have been derelict when the facility commenced but may have been fully restored/reclaimed or developed since. The status of new development sites could however be easily and usefully monitored.
WO2			
To protect and enhance the county's natural resources, environmental, social, cultural and economic assets, the character and amenity of the local area and the health and wellbeing of the local people			
PQ10-1712	<i>Mr P Blandon</i>	Implementation: 10.6 What about on going checks through the life of projects? Proper monitoring. 10.7 Possible lack of enforcement tools (financial resources etc) or political will etc.	Where necessary conditions will be included in planning permissions to address this issue and monitored in accordance with the Council's monitoring policy.

Reference	Name/Organisation	Summary of comments	Initial officer response
		Monitoring: WO2-9 Only if there are plenty of <ul style="list-style-type: none"> • funds available • Trained personnel including councillors • resources available • Members of the public who have the time and energy to be active, watchful and involved etc. 	Agreed. Monitoring is a fundamental part of the strategy and an Annual Monitoring Report will be produced. Most of the proposed monitoring indicators for this objective can be collected by the County Council's own staff.
OR6-800	<i>Herefordshire & Worcestershire Earth Heritage Trust</i>	Herefordshire & Worcestershire Earth Heritage Trust should be added to the list of responsible bodies available for technical advice.	Change to be made.
WO3			
To do everything possible to minimise waste production and make driving waste up the waste hierarchy the basis for waste management in Worcestershire			
PQ7-1551	<i>Spar Convenience Stores, Redditch</i>	It may cost more to utilise that energy depending on site location eg transport so objectives may not always be deliverable	This objective relates to the reduction, reuse of recycling of waste.
OR2-701	<i>Staffordshire County Council</i>	The policies are not capable of delivering the objectives because the target of WO3 "To do everything possible" and the Policies to "maximise" not "optimise" and unrealistic and capable of being used to object to any application. One can never monitor "maximising".	Agreed, change to be made.
PQ10-1712	<i>Mr P Blandon</i>	Implementation: Sounds good.	Support noted.
PQ24(also WR9) - 1645	<i>Mrs L Brookes</i>	Did you know that if there is an incinerator plastic will need to be burned to bulk up calorific value!	The Waste Core Strategy is not technology specific and does not propose an incinerator.
WO4			
To ensure that the waste implications of all new development in Worcestershire are taken into account			
PQ10-1712	<i>Mr P Blandon</i>	Implementation: See earlier answers Does this REALLY mean that all (borough) councils planning committee applications will actively	Once adopted the Waste Core Strategy will form part of the statutory development plan and it is part of the City, District and Borough

Reference	Name/Organisation	Summary of comments	Initial officer response
		consider every aspect of the WWCS? I bet they dont!	Councils' duty to consider it in making decisions on planning applications.
PQ24(also WR9) - 1645	<i>Mrs L Brookes</i>	But do it realistically.	Noted.
WO5			
To address the "Capacity Gap" between how much waste management capacity we have and what we need over the plan period to 2027			
PQ10-1712	<i>Mr P Blandon</i>	Implementation: As long as future funding allows for this.	The Waste Core Strategy will allow for proposals to be brought forward as there is a demand.
PQ24(also WR9) - 1645	<i>Mrs L Brookes</i>	This will fall with recycling.	The capacity gap will be monitored and the strategy reviewed as appropriate.
WO6			
To safeguard existing waste management facilities from incompatible development			
PQ10-1712	<i>Mr P Blandon</i>	Implementation: Increase distance and ensure all councils have this clearly marked on their maps etc.	Noted. At present the Environment Agency requires bio-aerosol assessments where waste sites handling biodegradable waste are within 250m of sensitive receptors. This has been used to inform the distance of this buffer zone. The City, District and Borough Councils will have access to the web-tool illustrating these buffers.
PQ24(also WR9) - 1645	<i>Mrs L Brookes</i>	Look at AD and completely rethink.	The Waste Core Strategy is not technology specific.
WO7			
To reduce waste miles by road			
PQ19-601	<i>Kempsey Parish</i>	WO7: Implications of more traffic on congested	Policy WCS 4 states that development must

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	<i>Council</i>	parts of A38 need to be considered.	not have unacceptable impacts on highway safety or congestion.
OR11-1586	<i>M V Kelly</i>	W07: "Alternative means of transport" this needs to be elaborated, and further explained as to what other means of transport should be implemented and encouraged so as to reduce the number of waste miles by road	This is expanded in the full consultation document to refer to the use of the rail network and navigable waterways.
PQ24(also WR9) - 1645	<i>Mrs L Brookes</i>	Don't send all to one place.	A methodology was developed to assess 160 locations in the county. Of these, 58 locations were identified as areas of search at this stage.
PQ38-1679	<i>Axis (on behalf of Mercia Waste Management)</i>	See response to Q7 (" <i>Not realistic in the context of paragraphs 2.13-2.16 of the emerging WCS</i> ").	The strategy seeks to minimise the distance waste is transported by road through considered location as well as the use of alternative means of transport, as stated in point vi of the vision. It is likely that this objective will be delivered by locating facilities close to waste arisings, onward treatment and end users.
WO8			
To encourage communities in Worcestershire to take responsibility for their own waste and involve all those affected as openly and effectively as possible			
PQ19-601	<i>Kempsey Parish Council</i>	WO8: Encouragement needs to be tangible, not just exhortation!	This objective will be changed to clarify.
PQ24(also WR9) - 1645	<i>Mrs L Brookes</i>	Only if Herefordshire also take responsibility for their own waste.	The reviewed Joint Municipal Waste Management Strategy sets out that municipal solid waste for the 8 councils in Herefordshire and Worcestershire will be managed in an integrated way. All other waste streams will be addressed through the normal competitive operations of the market.
WO9			
To develop a waste management industry that contributes positively to the local economy			

Reference	Name/Organisation	Summary of comments	Initial officer response
PQ19-601	<i>Kempsey Parish Council</i>	WO9: Not clear how relevant this is to rural areas	This objective will be changed to clarify.
PQ24(also WR9) - 1645	<i>Mrs L Brookes</i>	Private sector - no PFIs or public money. More than 1 contractor and not related!	This is outside the remit of the Waste Core Strategy.
General			
OR5-1707	<i>Mr Brett</i>	Agree WO1-4 and 6-9: In all cases my responses assume acceptance of earlier comments. Disagree WO5: without a greater level of information this is impossible.	Noted. Worcestershire's capacity gap is set out in more detail in the background document " <i>Arising and capacity</i> ", available on our website www.worcestershire.gov.uk/wcs . The capacity gap will be monitored throughout the life of the strategy.
PQ18-618	<i>Malvern Wells Parish Council</i>	(Q17) WO4, 6, 9: Don't know - if based on planning decisions then this is a district council matter	Agreed. This has been discussed with the District Councils.
OR12-1668	<i>Mr Dowty</i>	The county's waste objectives cannot be implemented and delivered until proper analysis is carried out on future projected waste arisings taking into account everything that is currently put in landfill (including commercial and industrial waste) which could be recycled, re-used or re-processed, instantly reducing the need to go to landfill. Also further analysis needs to be carried out on the long term health effects of all waste treatment processes. Modelling data on a computer is not an accurate measurement of what actually happens. Use data from Waste Data flow to identify projected waste arisings and information from expert private bodies e.g. Waste Watch.	The Strategy is based on the best available information from the Environment Agency. Defra has been developing improved data collection for some years, we will use this if it becomes available.

Reference	Name/Organisation	Summary of comments	Initial officer response
PQ24(also WR9) - 1645	<i>Mrs L Brookes</i>	You don't seem to monitor current systems well. I have no faith in you as an organisation. I do not think you listen to any of the public's opinions anyway. Recent experience in the handling of the application for the incinerator demonstrates this.	An annual monitoring report is produced in December every year to monitor our existing policies. This is available on our website www.worcestershire.gov.uk . Summaries of our responses to the Waste Core Strategy consultations undertaken to date are also available on our website or on request.
OR13-1635	<i>Mrs G Stevens</i>	WO1, 2, 3, 5, 7 and 9: I don't think anyone can know what to base anything on given population pressures, social change and consumerism. I think one can do ones best but there is bound to be a huge amount of guess work because there are a multiplicity of unknown and therefore unplannable factors. WO4, 8 and 9: Once again without a crystal ball I don't see how any strategy can expect to monitor trends that are so variable.	Noted, the strategy is based on the best available data. Change to be made to monitor proposed Development Plan Documents and any implications they may have for population change. Other elements of the strategy will also be monitored.
OR14-ANON2	<i>Anonymous</i>	There needs to be a sea change in attitude and application for WCC to achieve these outcomes. To date WCC have demonstrated that they are incapable of achieving these objectives and there is no finite or binding assurances in this document that they will do so. Waste Management has been managed by WCC in an incompetent manner over many years - this document does not indicate in any way that this incompetency has been recognised and will be changed. To date all the above "No" answers (<i>to objectives WO1, 2, 3, 5, 7 and 9</i>) are due to current WCC actions.	Once adopted all planning applications will be determined in accordance with the Waste Core Strategy, unless material considerations indicate otherwise. All such decisions can be subject to legal challenge.
PQ30-1649	<i>EM Jones</i>	This council appear to be tied into a flawed contract with its waste contractor and dont seem able to implement any more intelligent, more flexible, smaller units with a better more complete recycling system - so would find it impossible to	The Waste Core Strategy is not technology specific and does not propose an incinerator, although it provides a policy framework to assess proposals if they are brought forward. It will however include provisions to the

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>implement the JMWMS anyway.</p> <p>This council stated in their environmental statement Nov 2000 that - 2.89 - this site is the last remaining substantial plot of land on the trading estate located within the green belt. It is a greenfield site but the land is allocated for employment purposes. Planning policies rule out buildings higher than the existing structures (and therefore would rule out an IWMF). The land is not yet committed but may seem to small for an IWMF. How could it suddenly become suitable? HOW CAN WE TRUST THE PLAY ON WORDS THIS COUNCIL APPEARS TO USE?</p>	<p>implementation of the revised JMWMS possible.</p> <p>These comments seem to relate to the proposed EfW plant at Hartlebury and have been referred to the council's Development management team.</p>
PQ39-517	<i>Alvechurch Parish Council</i>	Deliverability naturally dependent on resources available (and against inevitable changes in waste trends, legal frameworks etc)	Noted, the strategy is based on the best available data. Change to be made to monitor proposed Development Plan Documents and any implications they may have for population change. Other elements of the strategy will also be monitored.
PQ40-610	<i>Lindridge Parish Council</i>	(Answer yes to all) But again see implications of retention of 2 tier local government system with potential areas for tension.	Noted.
PQ42-717 (L)	<i>Natural England</i>	Clear tools and suggested areas for guidance from Worcestershire County Council to others have been identified to aid implementation.	Support noted.
PQ27-1598	<i>Elgar Foods Ltd</i>	WO1: No costs are disclosed for costs of this. WO2-9: Need to address costs.	The council has a duty to monitor the adequacy and appropriateness of its policies. It will do so in the context of normal considerations of the public interest. The procedures
PQ31-642	<i>Rushock Parish</i>	(Q18 - Answer don't know) Do not have document	Noted, the full document was available to

Reference	Name/Organisation	Summary of comments	Initial officer response
	<i>Council</i>		view on our website, at libraries and hubs or on request.
PQ37-1622	<i>Worcester City Council</i>	WO1, 2, 4, 6, 7: What role is WCC playing in monitoring as it would appear that some of the indicators can only be monitored by the District. This may be additional to what is undertaken at present.	This will be discussed with the District Councils.
PQ39-517	<i>Alvechurch Parish Council</i>	A sample of monitoring information available and/or provided to parish councils would be useful to assess how easily we think the policy can be monitored.	An annual monitoring report is produced in December each year and is available on our website www.worcestershire.gov.uk/wcs . Please contact us if you would like any other information. At the moment we are working to establish a baseline for the indicators which have not previously been monitored and this will be made available once completed.
PQ41-1623	<i>Wychavon District Council</i>	Although the monitoring framework is supported amendments will be required, once the WCS is adopted, to the Local Area Requirements as this is not information currently asked for with planning applications. This in itself is not a particular problem, although failure to do so would result in applications being considered invalid. This is perhaps a matter that could be addressed collectively by the district councils across the County.	This will be discussed with the District Council Development Management Officers Group.
PQ44-608 (L)	<i>Lickey and Blackwell Parish Council</i>	Again, we do not have the expertise but would like to think that we are being presented with objectives that are deliverable	Noted.
OR16-547	<i>Chaddesley Corbett Parish Council</i>	Economic and financial constraints will be significant factors, leading to solutions being adopted that may be practical but not meet fully all of the objectives.	Proposals for new waste management facilities will be required to comply with the policies of the Waste Core Strategy once it is adopted unless exceptional circumstances are clearly justified.

Reference	Name/Organisation	Summary of comments	Initial officer response
		Monitoring will be more difficult where measures are qualitative.	Monitoring indicator targets have been designed to be quantitative wherever possible. Only indicators 8 and 9 are qualitative and they relate to landscape impacts which are not easily quantifiable. Those based on less objective measure will be refined.

Question 19: Have we defined all terms and acronyms sufficiently?

Reference	Name/Organisation	Summary of comments	Initial officer response
PQ10-1712	<i>Mr P Blandon</i>	Forward: 299,863t should be 299,863 t p10 15km should be 15 km, 5.3mt unacceptable abbreviation for million tonnes, p13 0.013ha should be 0.013 ha p16 and 52 and 100 Ha is not the symbol for hectare. P17 3,500t space needed, 10m3 space needed. P21and77 the y axis should be labelled	Noted, changes to be made.
OR6-800	<i>Herefordshire & Worcestershire Earth Heritage Trust</i>	A definition of Geodiversity should be added to the glossary of terms.	Agreed, to be added.
PQ24(also WR9) - 1645	<i>Mrs L Brookes</i>	A bit better than last time but confusing.	Noted. The final version of the document will be as clear as possible.
PQ31-642	<i>Rushock Parish Council</i>	Do not have document	Noted, the full document was available to view on our website, at libraries and hubs or on request.
PQ37-1622	<i>Worcester City Council</i>	Does Green Infrastructure include the historic environment? The Green Infrastructure Study being produced by WCC seems wider than your definition. Will this lead to confusion?	Noted, terminology and references to be clarified.
PQ39-517	<i>Alvechurch Parish</i>	Broadly yes, but please remember most people	Noted. We produced an information sheet

Reference	Name/Organisation	Summary of comments	Initial officer response
	<i>Council</i>	completing the questionnaire are not local government officers or waste management professionals!	and summary document in order to address this issue. The document is necessarily complex but we are aware it needs to be understandable and are aiming to improve this.

Question 20: Are there any other comments you wish to make?

Reference	Name/Organisation	Summary of comments	Initial officer response
PQ7-1551	<i>Spar Convenience Stores, Redditch</i>	It is important that any capital investments in technology are soundly based so that when they come to fruition the technology has not been superseded rendering the plant obsolete on completion	Agreed. The Waste Core Strategy will be as flexible as possible in order to cope with technological change and does not favour any specific technology type.
WR3-1632	<i>Mike Natrass, MEP for the West Midlands</i>	<p>The planning issues are presented takes no account of a fundamental flaw in the planning argument - more incineration capacity is not actually needed. Please see my position paper "Expensive rubbish" (http://www.ukipmep.org/News/news_expensive_rubbish.htm).</p> <p>There has been insufficient attention to the views of local opposition groups.</p>	<p>The Waste Core Strategy will be as flexible as possible in order to cope with technological change. Whilst provision has been made for the policies to be able to assess proposals for incineration, the Strategy does not favour any specific technology type.</p> <p>This is the third stage of consultation on the Waste Core Strategy. Details of the publicity activities relating to these consultations can be found in the "Regulation 30" document and we also published consultation response documents outlining</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
			changes made as a result of these consultations. These are available on our website (www.worcestershire.gov.uk/wcs).
WR5-696	<i>Herefordshire Council</i>	On behalf of Herefordshire Council I can confirm that I have no objections to the emerging policies or the objectives behind them.	Support noted.
OR5-1707	<i>Mr Brett</i>	I respond as an individual. However, I am Chairman of the BSI Environmental Monitoring Co-ordinating Committee and am Chairman of the Strategic Advisory Body on Environment of the European Standardisation Committee (CEN).	Noted.
WR6-ANON	<i>Anonymous</i>	I provide the following comments: I have no time to read 100 plus pages of document. I found reading the report took up a lot of my time but will say the following. As well as encouraging and hounding domestic residents to recycle more, why not do the same to business. One example would be pubs and clubs throwing away glass bottles all into landfill and shops etc throwing cardboard etc into landfill. I know about one place that shredded lots of paper etc and it went straight to land fill. THIS IS WHAT YOU HAVE TO SORT OUT.	We produced a 4 page information sheet and a 20 page summary document which were available on request and on our website. It is outside the remit of the Strategy to specify how businesses must deal with their waste, however the Strategy will enable recycling facilities to be provided.
OR8-625	<i>Norton & Lenchwick Parish Council</i>	Great ideas and goals in the theoretical sense but implementation in real life will be difficult given the nimby mentality of the people in this area.	Support noted. Objective WO8 is to involve everyone as openly and effectively as possible.
OR10-734	<i>Sport England</i>	A more positive statement regarding restoration would be welcomed. Sport brings a number of benefits to a local community including crime reduction, health and economic improvements. As land is restored, it can meet any shortfall of playing pitches which has been identified in Local Authority playing pitch assessments.	Change to be made.
OR12-1668	<i>Mr Dowty</i>	This, in line with other consultation documents from Worcestershire County Council, is an exceptionally lengthy document which is extremely difficult to answer. I feel it is almost designed to put people off from completing as it is	We produced a 4 page information sheet and a 20 page summary document which were available on request and on our website.

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>confusing and very technical. We are both intelligent individuals who read through complex documents on a daily basis yet we have struggled to complete this (and other consultations from WCC). Questions need to be put in laymans terms (it would definitely fail the campaign for plain english!) perhaps with direct links to the supporting info as we have found going back and forward very frustrating and tiring.</p>	<p>Questions were also flagged up at relevant points in the text and page references given on the questionnaire to make this as easy as possible.</p>
<p>WR7-1653 & WR9(also PQ24) - 1645 & WR21-1664</p>	<p><i>Mr A Jones</i> & <i>Mrs L Brookes</i> & <i>Mr and Mrs C Greatbatch</i></p>	<p>I am totally opposed to the building of an incinerator and it is encouraging that your own draft document supports the argument against this proposal. I would wish to use your own stated objectives to highlight this fact:</p> <p>WO1: The concept of burning many deleterious materials, including many which would otherwise be recycled, will of course increase greenhouse gases and further cause damage to the climate. This is not only from the burn process and the materials being burnt but also from the carbon footprint of transporting the waste.</p> <p>WO2: An incinerator will damage the county's natural resources and will have a negative effect on its economy as employers will seek alternative locations. Further, the amenity of the local area will be ruined and the surrounding population will be negatively effected.</p> <p>WO3: The concept of incineration is totally at the opposite end of the scale to that within the Waste Hierarchy and with the Council contracted, I presume, to providing a minimum level of materials to be burnt many materials will be burnt as opposed to sorted and recycled. It's as simple as 'why bother to recycle when there's a monster to feed?'</p> <p>WO7: The concept of waste management, be it incineration or other, is totally wrong and will lead to ridiculous road miles</p>	<p>The Waste Core Strategy is not technology specific and does not propose an incinerator. It does provide a policy framework for proposals to be assessed as they are brought forward.</p> <p>All applications will be determined in accordance with the development plan at the time, unless material considerations indicate otherwise. Because the Strategy has not been submitted, tested at examination or adopted by the council, the First Draft Submission Consultation Waste Core Strategy will be given no weight in the determination any applications.</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>being created. Having a lorry travelling from South Hereford to Hartlebury is incredulous and waste management needs to be addressed intelligently and locally.</p> <p>WO8: The proposal to build an incinerator in Hartlebury is at odds with this objective and I refer to the fact above that all communities should deal with their waste rather than shipping it many miles to be pumped into the atmosphere.</p> <p>WO9: The proposal to build an incinerator in Hartlebury will be damaging to the local economy as it will be a negative factor when employers are considering locating in this area, indeed existing employers may look to move to areas where their business will not be blighted.</p> <p>Given that an incinerator is diametrically opposite to nearly all of your objectives (as detailed above) I am encouraged by the proposed strategy as it wholly supports more intelligent thinking and adds to the strong argument against incineration.</p> <p>As you are no doubt aware there are many alternatives to incineration which have been successfully implemented by other councils across the country and tying the people of Worcestershire into outdated and damaging methods is wholly wrong. I am sure that your department will support alternative and intelligent methods for the good of the climate and for the health of future generations.</p>	
WR9(also PQ24)-1645	<i>Mrs L Brookes</i>	Perhaps you could speak to Coventry Council, who have discovered much better and more cost effective ways of dealing with their waste and are in the process of de-commissioning their old incinerator. Perhaps the County Council could meet with WAIL and discuss the research that they have undertaken.	The Waste Core Strategy is not technology specific and does not propose an incinerator. However, in accordance with national policy, it must be based on the Waste Hierarchy. All background documents are

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>Finally I am a little puzzled by the paragraph on the inside cover of the Worcestershire Waste Core Strategy: First Draft Submission Consultation. It reads "You may be aware that an application for planning permission has been submitted for an Energy from Waste Plant at Hartlebury. That application will be determined in accordance with the Development Plan current at the time unless material considerations indicate otherwise. Because it has not been submitted, tested at Examination or adopted by the Council, the First Draft Submission consultation Waste Core Strategy will be given no weight in the determination of the application". Would you be kind enough to explain what this means please?</p>	<p>available on our website www.worcestershire.gov.uk/wcs or are available on request. We would welcome any comments on these documents. The chairman of WAIL was consulted at this and previous stages.</p> <p>The paragraph is included to set out the status of the First Draft Submission consultation, to make clear that it will not be used to "determine" (assess if planning permission should be granted) current applications for waste management facilities. The text referred explicitly to the Hartlebury application in this context because it was the most important matter of public concern at present. The process by which proposed policy documents become part of the Development Plan, and can be used to determine applications, is a lengthy and complex matter of national policy statements, statutory regulations and case law. The best short summary I am aware of is in the national planning policy statement "The Planning System: General Principles" which states: (When considering applications</p>

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			<p>for planning permission, that)</p> <p>".....account can also be taken of policies in emerging DPDs. The weight to be attached to such policies depends upon the stage of preparation or review, increasing as successive stages are reached. For example: Where a DPD is at the consultation stage, with no early prospect of submission for examination, then refusal on prematurity grounds would seldom be justified because of the delay which this would impose in determining the future use of the land in question. Where a DPD has been submitted for examination but no representations have been made in respect of relevant policies, then considerable weight may be attached to those policies because of the strong possibility that they will be adopted. The converse may apply if there have been representations which oppose the policy. However, much will depend on the nature of those representations and whether there are representations in support of</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
			<p>particular policies."</p> <p>The issues are further complicated by changes introduced in the "Planning and Compulsory Purchase Act" 2004 (which post dates "Planning General Principles") which requires submitted plans to be found "sound" by a Planning Inspector before they can be adopted. The Inspector can find plans unsound even where no objections have been made to them in whole or part. In the circumstances the legal advice I have received is clear, the current consultation document could not be used by the council to determine current applications, including that at Hartlebury. The statement is included and made prominent in the document to make this clear to the public.</p>
WR8-672	<i>White Ladies Aston Parish Meeting</i>	Thank you for the opportunity to respond to this document. It has raised several issues, one of which is the fact that District councils will have to find sites for waste water treatment facilities.	Noted.
WR8-672	<i>White Ladies Aston Parish Meeting</i>	On studying the site location map we do wonder what routes will be chosen for the removal and distribution of the various waste streams.	Policy WCS 1 includes consideration of connections to the strategic transport network in determining site locations. Further

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			details will be assessed as applications come forward.
WR11-1292	<i>Defence Estates</i>	<p>Technical Safeguarding Interests: There are two Ministry of Defence (MOD) technical safeguarding sites located within the Worcestershire county. These sites are Defford and Malvern DERA.</p> <p>The principal safeguarding concern in relation to the MOD regarding the above safeguarding zones is the potential for waste management facilities to interfere with radio frequencies and other technical equipment. Any waste management facilities that fall within these safeguarding zones and that meet the safeguarding criteria should be referred to this office to ensure that MOD technical equipment is not unduly affected by development. Having reviewed the proposed locations for waste management sites, it is unlikely that any of the areas will be affected by the safeguarding zones however all MOD safeguarding interests within Worcestershire County have been represented to ensure that developments are appropriately captured. I trust this adequately explains our position.</p>	Noted.
WR14-682	<i>Redditch Borough Council</i>	We have discussed waste management facilities with the County Council previously and this will be reflected within the core strategy policy.	Noted.
WR16-678	<i>Wythall Parish Council</i>	My Council, having carefully considered all the documentation, have decided that they are not able to comment on same as we do not have the expertise that enables us to do so.	Noted, we produced an information sheet and summary document to address this issue.
PQ22-1325	<i>Associated concrete solutions ltd</i>	Good Luck - having promoted recycling for many years we know the difficulties you will experience.	Noted.
WR9(also PQ24)-1645	<i>Mrs L Brookes</i>	People in rural areas need neighbour notification regarding any proposals. Proposals should not be forced on the local community.	The Development Management Procedure Order (2010) sets out minimum standards for the publicity of planning applications. The

Reference	Name/Organisation	Summary of comments	Initial officer response
			council exceeds these standards in line with the Statement of Community Involvement.
OR13-1635	<i>Mrs G Stevens</i>	Looks good, can it perform as well as it hopes?	The monitoring section is intended to assess the effectiveness of the strategy and will trigger review when necessary.
OR14-ANON2	<i>Anonymous</i>	This document is only marginally less poor than the previous one.	Noted.
WR18-1041	<i>Worcestershire Acute Hospitals NHS Trust</i>	Whilst I do not feel it appropriate to complete the attached questionnaire in detail I can confirm that Worcestershire Acute Hospitals NHS Trust is in agreement with the objectives and policies outlined. I also note that no capacity gap has been identified for hazardous and clinical waste and that therefore no new capacity has been identified for these waste streams.	Support noted.
WR19-528	<i>Bewdley Town Council</i>	<p>The Town Council has made some comments as to the overall principles of the document earlier in the year and appreciate how the process has been continued up to the present stage.</p> <p>In many ways Councillors found making either meaningful or incisive comments difficult because the overall objectives and vision as expressed in broad terms are uncontroversial and are such that few could disagree with them unless there was some particular technical flaw that we would not be able to recognise.</p> <p>When it comes to this kind of consultation then whatever the length of the document or the summary, Councillors rightly look for obvious effects on their own neighbourhoods. This leads them to the "areas of search" schedule which you had helpfully included within the summary.</p> <p>Within that list there is one reference to a site within the Bewdley boundary namely Blackstone Quarry. However, the</p>	<p>Support noted.</p> <p>Noted.</p> <p>The Waste Core strategy will identify "Areas of Search" and in very broad terms, what kind of facility would be acceptable within these areas, but it will not be technology specific or define precisely what will be acceptable on</p>

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		<p>problem that arises is there are no specific proposals for what may be sited here other than some "waste management facilities" and there is a risk that approval at this stage is seen as a blank cheques for development that may ultimately be very undesirable.</p> <p>Having said that the Council appreciates that this document is a long term strategy and is not one where such specific proposals as such are contemplated. On that basis the town council lends its approval to the overall vision and objectives of waste management through until 2027 but would of course wish to monitor closely any further thoughts as to the use of Blackstone Quarry or indeed any other site within Bewdley that may emerge for consideration in future years.</p>	<p>any particular site. In every case applications will also be assessed against a wide range of criteria to protect local people and amenities. It should not be assumed therefore that even if somewhere was identified as an area of search that waste facilities would necessarily be granted planning permission there.</p> <p>The types of waste facility identified are very broad groups e.g. category 1, those akin to industrial activities (i.e. like B2 industry) which would best be located in areas like industrial estates or active mineral workings or landfills. Proposals for facilities on mineral workings or landfills will also have to demonstrate a clear operational relationship between the proposal and the existing site and would also be limited to the operational life of the site.</p> <p>Type 2 facilities would be those whose nature and scale of facility were less industrial in their impact on their surroundings or were directly related to rural arisings or after-uses and would be in keeping with the types of land indicated. These would only be very small scale facilities. A 3rd category for other specialised kinds of facilities</p>

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			<p>will also be developed.</p> <p>We are currently revising the strategy as a result of the comments we have received. The final strategy will very probably retain the concepts set out above. It is very likely however that we will limit the "Areas of Search" to industrial estates and will delete Blackstone (and other) quarries from the list. This would not prevent applications for sites like Blackstone from coming forward but any such would be assessed against all the policies in the plan and would also have to demonstrate a clear operational relationship between the proposal and the existing site and would also be limited to the operational life of the site.</p>

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			Support noted.
WR21-1664	<i>Mr and Mrs C Greatbatch</i>	I am sure you are aware of this weeks' BBC production of "Inside Out" (Nov 1st) which focused on waste disposal and in particular waste incineration. The Programme highlighted the increasing rate of recycling and thus the ever reducing amount of residual waste. For local authorities already locked into an agreement with incinerator companies this results in surcharges to local authorities and thus council tax payers. Through better recycling there is a lack of sufficient waste to make incineration an efficient and viable means of dealing with residual waste.	The Waste Core Strategy promotes the management of waste at the highest appropriate level of the waste hierarchy. It is not technology specific and does not propose an incinerator, although it provides a policy framework for proposals to be assessed if they are brought forward.
WR22-652	<i>Stanford with Orleton Parish Meeting</i>	A representative cross section of our local parish met yesterday evening to fill in your questionnaire. As the questionnaire is made out in my name, I felt that I should let you know of the feelings of our Parish Meeting. We would obviously like to be kept informed but I believe that the questionnaire in this instance was one we could not fill in. Unfortunately as they progressed through the questionnaire it became apparent that all that could be sent back would be a list of 'Unsure/don't know.' They felt that it was not aimed at local people as we had not previously been aware of the information that you quoted - therefore cannot confirm nor deny that this is the best option.	Noted. We produced an information sheet and summary document to inform you of the main elements of the Strategy. The questionnaire included references to the relevant sections of both the main document and summary document. We would welcome comments in whatever form you consider appropriate.
WR24-588	<i>Hartlebury Parish Council</i>	Authorities must look to develop a Waste Core Strategy with intelligent use of techniques and technologies available which does not entail excessive cost and does not tie the County into long term, restrictive technology.	The Waste Core Strategy is not technology specific and is designed to be flexible and allow future technologies to be brought forward.
WR26-704	<i>Warwickshire County Council</i>	We notice on 'Figure2a : Levels of Housing Growth' map that there is reference to the proposed Eco-Town at Long Marston. It may be worth noting the current position as of 29 June 2010 from CLG which stated that 'the government will not designate or impose a solution on a particular area and will not support an eco-town if the local community are opposed to it'. As there appeared to be very little support for the proposal	Noted, change to be made.

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		from any public body with responsibilities for the area or the local community it is unlikely that a planning application would get support from government.	
WR26-704	<i>Warwickshire County Council</i>	In addition to the above our previous comments on cross boundary movements should still be considered.	Change to be made.
WR28-1657	<i>Mr Beard</i>	If you began planning well over a year ago, as I initially suggested, to build an integrated waste management strategy based around building a few huge or perhaps several AD plants throughout different areas of the county then you're certainly on the right track. This would be achieved through public and mostly private investment from local industry, on the basis that they will not have to pay for very little of their food and perhaps recycling material (subject to negotiation) to be collected, because the new refuse recovery vehicles could be fuelled by the energy produced within the plants. However, if the council is happy for food to go to landfill and for plastic recycling for instance, to be transported to China where some of it is burnt on the streets by children and young adults then my advice probably isn't going to be of any use to you.	The Waste Core Strategy is not technology specific and is designed to be flexible to allow future technologies to be brought forward. We live in a market economy. Many of the ideas you mention are outside the remit of the Waste Core Strategy.
WR29-719	<i>Environment Agency</i>	In the main the document is thorough and in accordance with the general advice set out by the Planning Inspectorate (Examining Development plan Documents: Learning From Experience, September 2009). However we have concerns over flood risk, the evidence base and 'allocations', and the justification of the cross-boundary treatment of municipal waste. We also have some concerns regarding hazardous waste and contradiction within the document over landfill policy. Additional Capacity Requirements We have previously provided detailed comment on this matter. We queried the generated "waste miles" concerning Municipal Solid Waste treatment (MSW) and whether this was justification in itself for creating facilities to negate these miles.	Noted, these matters will be discussed further with the Environment Agency.

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		<p>The existing arrangement in the JMWMS commits to locating MSW treatment facilities for waste created in both Herefordshire and Worcestershire solely in Worcester. This is not in accordance with PPS10 and would seem to conflict with policies WCS1 and WCS2 and be contrary to the aims of objective W07.</p> <p>Whilst acknowledging paragraphs 2.38-2.39 of the First Draft we remain cautious that the interdependency between counties is well enough justified in accordance with the requirements of PPS12. Where a WPA is relying on waste management capacity being provided outside its administrative boundary there should be clear and robust evidence to demonstrate that this is the case. We are not sure that the First Draft communicates this justification. We would welcome some clarity on this matter as per previous correspondence.</p> <p>It is important to note guidance in PPS10 states that waste core strategies should both inform and in turn be informed by any relevant municipal waste management strategies. In response to the comments made in paragraph 2.40 we draw your attention to the Planning Inspectorate Document: Examining Development plan Documents: Learning From Experience, September 2009. Particularly paragraph 47. This states: <i>... "one issue appears to be the extent to which waste plans should take account of procurement matters and the availability of sites already owned by the waste operators. PPS12 paragraph 3.1 makes it clear that planning for waste should be treated in the same way as planning for any other type of development and CLG has consistently pointed out that waste disposal must be plan led."</i></p> <p>Biodiversity</p>	

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		<p>The methods of identifying and risk categorising potential search areas for site waste management facilities acknowledge the key biodiversity constraints. Objective W02 safeguards and acknowledges existing policies necessary to protect the integrity of the counties natural features, legally protected sites, species and their supporting habitats.</p> <p>Miscellaneous Page 6 1.4 - ref "4" states Directive 2006/12/EC - this should reference Directive 2008/98/EC which succeeds this reference.</p> <p>Summary Whilst in the main the document is welcomed, we have outstanding concerns over flood risk, the evidence base and 'allocations'. We have recommended a meeting is held to discuss these matters by separate letter. The justification of the cross-boundary treatment of municipal waste also requires additional work. We would also welcome clarification over the hazardous waste issue and the contradiction within the document over landfill policy.</p> <p>I trust that the above is clear and assists you in the preparation of the final submission document but should you wish to discuss any of the above please do not hesitate to get in touch.</p>	<p>Support noted.</p> <p>Change to be made.</p> <p>These matters will be discussed with the Environment Agency.</p>
WR30-716	<i>English Heritage</i>	<p>Overall we welcome the consultation document and the clarity with which it presents and analyses a complex array of information.</p> <p>English Heritage submitted comments on the emerging strategy in 2009 at the stage of the refreshed issues and options and the preferred options. A number of these earlier</p>	<p>Support noted.</p> <p>Noted, changes to be made, see comments above.</p>

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		<p>comments are addressed, although there are several areas where further clarification is required.</p>	
WR31-1688	<i>Severn Trent Water</i>	<p>We have made the comments below in relation to the "impact of new waste management for new developments which is on Page 16 section iv of the document.</p> <p>They will not have a detrimental effect on groundwater quality; the Environment Agency Groundwater Source Protection Zone policy provides guidance on development.</p> <p>They will not have a detrimental impact on the water quality at water supply surface water abstraction sites, classified by the Environment Agency as surface water Drinking Water Protected Areas.</p> <p>They will not significantly impact on the water resources or natural surface water and groundwater flows. They will not significantly impact on biodiversity of groundwater supported systems ecosystems or surface water courses; they may even be designed to enhance biodiversity. They should take into account the principles of the Water Framework Directive and taking into account details summarised in the River Severn Basin Management Plan prepared by the Environment Agency.</p> <p>Risk assessments should be undertaken to support any proposed development applications.</p>	<p>This comment appears to have been made in relation to the Summary Document. These issues are covered in policy WCS 4 in the main document. Zones not included in the current policy and supporting text will be discussed with the Environment Agency.</p>
WR32-1624	<i>Wyre Forest District Council</i>	<p>The proposed figures for development should be updated to reflect the most recent publication of the Wyre Forest Core Strategy. The indicative figures for residential development are as follows:</p> <p>Kidderminster: 2,400</p>	Change to be made.

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		Stourport-on-Severn: 1,200 Bewdley and Rural Areas: 400 Site 27: Blackstone Quarry is wrongly located and needs to be altered accordingly	
WR32-1624	<i>Wyre Forest District Council</i>	The document identifies that there will be a need to upgrade and improve the household recycling centre in Kidderminster (para 2.34): Support for this planned improvement	Noted.
WR32-1624	<i>Wyre Forest District Council</i>	Paragraph 2.35 suggests that Kidderminster will need some increased capacity to deal with waste water: WFDC question this sentence. The District Council's Water Cycle Strategy identified sufficient capacity in Kidderminster at Oldington Treatment Works. Furthermore, the background study to inform the Waste Core Strategy (Waste Water Treatment Infrastructure) identifies on p.55 that the Oldington Treatment Works is at low risk in all categories on the table, suggesting there is sufficient capacity to meet demand.	Change to be made
WR32-1624	<i>Wyre Forest District Council</i>	The document identifies that there is no capacity gap for clinical waste, non-nuclear and nuclear industry low-level radioactive waste and therefore no new facilities need to be planned for: WFDC support the notion that these facilities should not be specifically catered for and any application submitted should be decided through the development control process with full regard had to the Development Plan.	Support noted.
PQ27-1598	<i>Elgar Foods Ltd</i>	This is a difficult questionnaire to complete and requires more knowledge of waste management strategies than I or the majority of the public has. Documents and information need to be clear and easily understandable. The documentation was unfortunately difficult to read and did not explain the issues or proposals in a format that was easily understandable. Elgar Foods is a food manufacturer in Tenbury Wells	The issues are necessarily complex but we produced an information sheet and summary document to inform you of the main elements of the Strategy. The questionnaire included references to the relevant sections of both the main document and summary document. Policy WCS 4 is designed to ensure

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		<p>employing 21 members of staff on the Tenbury Business Park. Any waste management scheme identified for the business park needs to take due consideration on the impact of a food business. There are strict constraints by our customers and government bodies regarding the manufacture of food products. Certain waste activities on the Tenbury Business Park will have a serious negative effect on the ability to manufacture product safely and could jeopardise the future employment of the 21 staff involved in the business.</p>	<p>that there is no unacceptable impact on amenity and the Environment Agency also plays a role as pollution control authority. Any proposals will be assessed as they are brought forward.</p>
PQ30-1649	<i>EM Jones</i>	<p>The West Midlands Regional Waste Planning Strategy in 2001 recognised that many authorities in the area have entered into detailed and lengthy waste contracts with little flexibility for change. WCC still appear determined to remain inflexible.</p> <p>The existing policies for the protection of the environment and visual amenities would obviously protect an area from</p>	<p>Noted. The County 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). These are 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. Within this context the Waste Core Strategy sets 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.</p> <p>Policies WCS 2 and WCS 4 consider the design of Waste</p>

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		inappropriate development and HEIGHT of buildings.	Management Facilities.
PQ32-internal	<i>Worcestershire County Council Economic Development</i>	Is there scope for inclusion of specific mention of the role of the 3rd sector in waste management?	Noted, change to be made.
PQ36-688	<i>Herefordshire and Worcestershire Joint Waste Resource Management Forum</i>	Attached statement of evidence to the current review of national waste strategy.	Document to be reviewed and relevant changes made.
PQ37-1622	<i>Worcester City Council</i>	This is an officer response which has been authorised by the Urban Renaissance Portfolio Holder.	Noted.
PQ39-517	<i>Alvechurch Parish Council</i>	A single page (executive) summary might address the above point (" <i>please remember most people completing the questionnaire are not local government officers or waste management professionals!</i> ").	We produced an information sheet and summary document to inform you of the main elements of the Strategy.
PQ40-610	<i>Lindridge Parish Council</i>	Merely to reiterate the implications in all this for close collaborative working between the County and District Councils and the potential advantages of a Unitary Structure.	Noted.
PQ41-1623	<i>Wychavon Parish Council</i>	This is an officer response.	Noted.
PQ42-717 (L)	<i>Natural England</i>	We welcome the council's approach to waste planning for Worcestershire. We are pleased that a number of the comments made by us at the Emerging Preferred Options stage have been addressed.	Support noted.
WR33-584 (L)	<i>Hampton Lovett and Westwood Parish Council</i>	<p>(<i>This reply was part of a longer letter with specific reference to application number 10/000025/CM. That letter was copied to the Council's Development Control section and only the part of the letter relevant to the Waste Core Strategy First Draft Submission Consultation is reproduced and responded to here.</i>)</p> <p>Since [June 2010] there has been considerable media coverage most of it suggesting that we should concentrate on recycling rather than incineration. We understand that we</p>	Noted. We produced an information sheet and summary document to inform you of the main elements of

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		<p>have had the opportunity to pass comment in a sophisticated account "First Draft Submission Consultation Questionnaire September 2010". We have not returned this as we felt we have not had enough detailed background knowledge to answer the many questions with the expertise and professionalism they deserve...</p> <p>It is very difficult to understand where technology will take us in the next 25 years although certain States in the United States of America appear to be making the 100% recycling process a commercial and cost effective proposition. This is the route we would support rather than the current proposals within the above application.</p>	<p>the Strategy. The questionnaire included references to the relevant sections of both the main document and summary document. The Waste Core Strategy is not technology specific and is designed to be flexible to allow new technologies to come forward.</p>
WR34-524 (L)	<i>Belbroughton Parish Council</i>	<p>Belbroughton Parish Council would like to reiterate its earlier opposition to the use of green belt land for waste facilities in principle since this is bound to have a significant adverse impact.</p> <p>The Council would also like to make the following points:</p> <ul style="list-style-type: none"> • adequate resources for enforcement of planning conditions at waste sites is crucial if the impact of these facilities is to be controlled • there should be a benefit for the local community from development of waste facilities in the area - a contribution for community facilities similar to that routinely levied on significant building projects. 	<p>Noted. The proposed policies are in accordance with national guidance on the protection of green belt.</p> <p>Noted and agreed. The council employs a monitoring and enforcement officer whose role includes this.</p> <p>We will look into this. Recent government statements suggest that something like this may be possible, we will be guided by government policy in this regard.</p>
WR25-4	<i>Network Rail</i>	<p>Upon review of this document, Network Rail has no specific comments to make about its content although we would make</p>	<p>Change to be made to reflect these comments.</p>

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		<p>the following observations:</p> <ul style="list-style-type: none"> • There is rail capacity on most routes in Worcestershire but this is not available at peak times. • As Worcestershire has sufficient landfill capacity within the county the length of rail haul would be very short, this combined with the costs of modal transfer are not likely to make rail cost effective. • Rail generally handles trainloads conveying up to 1000 tonnes payload and even on a weekly train basis a terminal/waste transfer station would need to have throughput of 52,000 tonnes a year. • Network Rail would be prepared to meet with Worcestershire County Council if further information is required. 	
WR35-1216 (L)	<i>Salford Priors Parish Council</i>	Salford Priors Parish Council has considered your First Draft Submission Consultation and following a full response in January this year we have little to add. We are pleased to see many of our earlier observations included in your response and we particularly support the locating of new waste management facilities on industrial parks where there is good road access.	Support noted.