

**Copy of representations made in accordance with  
Regulation 28 (2) on  
the *Waste Core Strategy for Worcestershire*  
*Publication Document (Regulation 27)***

**and**

**The Council's draft response to the issues raised,  
including draft proposed changes to be submitted to  
the Inspector for consideration**

**Updated 11<sup>th</sup> July 2011**

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# Introduction

Consultation on *Waste Core Strategy Publication Document (Regulation 27)* ran from 22<sup>nd</sup> March 2011 to 5.30pm on 4<sup>th</sup> May 2011. This document records all representations received and sets out the Council's initial response. At this stage the proposed changes are yet to be endorsed by Full council and are provided for information only.

Where the Council intends to submit proposed changes to the Inspector for consideration these are detailed next to the individual representation. They are also listed in *Annex 1: Schedule of draft proposed changes to be submitted to the Inspector for consideration*.

Some of the representations relate to issues outside of the remit of the Waste Core Strategy. In this case no action is proposed, however all representations have been forwarded to the Council's Development Control and Waste Management teams for consideration.

## Summary of comments

Representations were made by 89 individuals or organisations during the consultation period. A further 3 late comments were received. Several respondents made multiple representations and 180 representations were received overall.

### ***Legal compliance***

Ten representations (5.5%) stated that the Waste Core Strategy Publication Document (Regulation 27) was not legally compliant.

The following reasons were specified:

- **The Green Belt policy in WCS10 is not in accordance with national policy.** Changes are proposed to address this issue.
- **Consultation has been inadequate and consultation responses have not been taken into account in the Development of the Waste Core Strategy. The consultation questionnaire was long and complex and the consultation period for the *Waste Core Strategy Publication Document (Regulation 27)* was inadequate** Consultation has been carried out in accordance with the regulations and the Statement of Community Involvement. Consultation comments at each stage have shaped the development of the Waste Core Strategy, as set out in the *Regulation 30 document* available on our website [www.worcestershire.gov.uk/wcs](http://www.worcestershire.gov.uk/wcs)
- **The calculation of the capacity gap has not had regard to the information contained in the Joint Municipal Waste Management Strategy 1st Review. It presents inconsistent figures, particularly in respect of future MSW capacity requirements for 'other recovery'.** The figures used in the Waste Core Strategy are based on those set out in the Joint Municipal Waste Management Strategy. Discussions with the representor regarding these issues are ongoing.
- **The final paragraph in both Policies WCS2 and WCS11 sets the wrong test in terms of national planning policy.** Discussions with the representor regarding this issue are ongoing. The Council intends to propose a change to address this.
- **The statement in paragraph 2.16 regarding freight traffic on the county's rivers and canals does not reflect the evidence base.** Changes are proposed to address this issue.

One comment was made in relation to procurement law. This is outside the remit of the Waste Core Strategy.

All representations from specific consultation bodies that responded to this consultation stated that the *Waste Core Strategy Publication Document (Regulation 27)* was in their opinion legally compliant.

## Soundness

56 representations (31%) stated that the Waste Core Strategy Publication Document (Regulation 27) was sound. 73 representations (40.5%) stated that the Waste Core Strategy Publication Document (Regulation 27) was not sound:

- 21 representations considered the DPD to be unsound because it is not justified,
- 21 representations considered the DPD to be unsound because it is not effective and
- 12 representations considered it to be unsound because it is not consistent with national policy.

The remaining 51 representations did not specify whether in their opinion the Waste Core Strategy Publication Document (Regulation 27) was sound or not.

All representations from specific consultation bodies either stated that the *Waste Core Strategy Publication Document (Regulation 27)* was in their opinion sound or that they would consider it to be sound if changes proposed in *Annex 1: Schedule of draft proposed changes to be submitted to the Inspector for consideration* were made.

The main issues raised in response to the *Waste Core Strategy Publication Document (Regulation 27)* being unsound are as follows:

- **The Waste Core Strategy is technology specific and is biased towards energy from waste through incineration** (48 representations). The Waste Core Strategy is not technology specific. In line with the vision and WO3 it seeks to promote the management of waste at the highest appropriate level of the waste hierarchy. This will be implemented in particular through policies WCS1, WCS2, WCS3 and WCS14.

Any decision regarding the methods used for the management of Municipal Waste are separate from the Waste Core Strategy which is related to the planning issues. 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.

The JMWMS deals with how municipal waste should be managed. The Waste Core Strategy must set the policy framework by which all waste management facility developments must be assessed, including those brought forward from the JMWMS. Any application for planning permission will be determined on its merits, judged on the basis of the Development Plan, of which the Waste Core Strategy will form part.

- **The waste data used is inadequate/flawed** (44 representations). The baseline data used is the best available. The alternatives considered and risk assessments of the approaches chosen are given in the *Worcestershire Waste Core Strategy Background Document: "Arising and capacity"* available on our website [www.worcestershire.gov.uk/wcs](http://www.worcestershire.gov.uk/wcs). The bases behind the projections were included in previous consultation documents, however the assumptions behind them are complex and in order to keep the publication document as clear and concise as possible, full details of the data options considered and used, as well as risk assessments for the approaches used, are instead contained in the background document.

Issues regarding the reliability of waste data are widely acknowledged and have been discussed with the RTAB (Regional Technical Advisory Body for Waste) in developing the proposed RSS phase two revision. Although the most accurate data has been chosen as far as possible, the Council has taken an approach which possibly over-estimates the amount of

waste arising and the scale of the capacity gap over the period of the Waste Core Strategy. This is in order not to constrain development by underestimating the level of need.

*Worcestershire Waste Core Strategy Background Document: "Arising and capacity"* has now been amended to make it easier to follow, however the data and assumptions remain unchanged. This is the most up-to-date data. Several of the background documents informed early stages in the development of the Waste Core Strategy but have not been updated in light of new information. Where this is the case it is clearly stated on the first page of the document.

- **The Green Belt policy in WCS10 is not in accordance with national policy** (40 representations). Changes are proposed to address this issue.
- **Concerns about waste being imported into the County, particularly from Herefordshire, and concerns that the policy framework does not seek to reduce waste miles. Some representations also query why the Waste Core Strategy does not propose development in Herefordshire** (40 representations) Some imports and exports of waste are inevitable as they reflect the normal working of the private sector economy. The Waste Core Strategy is concerned with all waste, including commercial and industrial waste, agricultural waste, construction and demolition waste, hazardous, clinical and radioactive waste, and municipal solid waste. These wastes are managed by private companies and the Waste Core Strategy is not able to impose barriers to the movement of waste. It employs the concept of 'equivalent self-sufficiency' to take account of this, thereby planning for facilities to manage the amount of waste equivalent to the county's arisings.

The Waste Core Strategy is a document which relates to the County Planning Authority area of Worcestershire. Planning policies for Herefordshire are contained within the Herefordshire Unitary Development Plan. The councils in Worcestershire and Herefordshire work together to deliver the Joint Municipal Waste Management Strategy. Both Worcestershire County and Herefordshire unitary councils are party to a joint integrated PFI waste management contract. The JMWMS deals therefore with how municipal solid waste (MSW) from the two counties should be managed; The Waste Core Strategy must set the policy framework by which proposals for waste management facility development in Worcestershire for all waste streams must be assessed. For this reason, the Waste Core Strategy takes into account both Herefordshire's MSW arisings and management capacity in so far as these are part of the PFI contract but does not set out policies relating to Herefordshire or include Herefordshire in the maps or geographic hierarchy.

- **Opposition to the concept of landfill mining** (35 representations) Paragraph 3.26 makes reference to potential future 'landfill mining' proposals. This refers to the potential for materials such as metals to be recovered from historic landfills. It does not indicate an 'anticipated lack of waste' and at present such proposals seem unlikely. The council is aware of the potential hazards such a proposal could bring, and paragraph 3.26 makes clear that the Environment Agency would need to be consulted about any landfill mining proposal.
- **Concern about the construction of bunds, embankments, and features for noise attenuation and landscaping** (35 representations) Paragraph 3.24 makes reference to these features to highlight that they would be considered against policy WCS3 (Landfill). This is to avoid ambiguity. It does not actively encourage such features. To improve clarity we propose the following change: Paragraph 3.24 "...Proposals for this type of development will be considered against **this policy WCS 3: Landfill and Disposal**
- **Figure 16 does not include the cost of gate fees of incineration; the method already chosen. This lacks transparency and fails to demonstrate value for money for the tax payer.** (35 representations) The Waste Core Strategy is technology neutral. Figure 16 is reproduced from a regional study by Advantage West Midlands, "Waste – Future Resource for Business" (2008). The report does not include equivalent information for other treatment methods and this information is not readily available elsewhere. It is intended to indicate

relative costs across various waste management options to demonstrate that recycling technologies will be increasingly viable over the life of the Strategy. Although we recognise that Incineration or Energy from Waste facilities are not shown in Figure 16, we do not have the information available to supplement this study. As the figure is intended to be indicative and the Waste Core Strategy is not technology specific this is not considered to be an issue of soundness.

- **Concerns relating to the complexity of the consultations, the timescales for responding** (31 representations) The consultation was listed on the council's online consultation portal a month in advance and Parish councils were also written to in advance to enable them to arrange meetings to discuss the WCS if they felt this to be necessary. The Waste Core Strategy has been subject to formal consultation at 3 previous stages and reports have been prepared at each stage outlining how consultation comments have been taken into account. Positive feedback has been received from respondents to these consultations commenting that feel their views have shaped the development of the Waste Core Strategy.
- **Concerns regarding implementation** (28 representations). In general these representations do not include specific details regarding the aspect of implementation to which they relate. The *Waste Core Strategy Publication Document (Regulation 27)* includes detailed sections specifically setting out how it will be implemented and monitored. This issue will be considered by the Inspector when examining the submitted Waste Core Strategy.

Other representations related to the protection of Grade 1 agricultural land, the consideration of alternatives, monitoring indicators and the time span of the WCS.

Several representations related to issues which are outside the remit of the Waste Core Strategy, such as waste collections services and the PFI contract for municipal waste. 77 representations made reference to a planning application for an Energy from Waste facility near Hartlebury. The Planning and Regulatory Committee duly considered the application on Tuesday March 1, 2011 and the Committee unanimously resolved that its members were 'minded to approve' the application. The Committee could not grant approval on the day because the Secretary of State has the option to 'call in' the application for a Government decision. The application has now been forwarded to the Secretary of State for a decision about whether his department will review the committee's decision. On Tuesday, May 10, the council was informed that the Secretary of State will be 'calling in' the application for his own decision. The timetable for the Public Inquiry is not yet known.

# Table of representations

Respondent	Representation	Verbatim comment	Action
<b>1702/1</b> Mr Dolcy, BDW Plc	<b>Part:</b> Not specified <b>Legally compliant:</b> Yes <b>Sound:</b> Not answered  <b>Wish to participate at EiP:</b> Not specified	No comments.	<b>No changes proposed.</b> Support noted.
<b>862/2</b> Mr A Harrison, Centro	<b>Part:</b> Not specified <b>Legally compliant:</b> Yes <b>Sound:</b> Yes <b>Wish to participate at EiP:</b> No	<p>Although this plan 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." 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.</p> <p>Strategic Objective WO7 "to reduce waste miles by road where possible" is welcomed. Full consideration should be given to the use of rail freight to transport</p>	<b>No changes proposed.</b> <p>The response referred to WO7 as set out in the First Draft Submission Consultation. Centro were contacted to clarify this point (30<sup>th</sup> March 2011).</p> <p>Centro responded (30<sup>th</sup> March 2011) (recorded as consultation response 862/2/b):</p> <p><i>"Thank you for the message and apologies for the mistakes with the response.</i></p> <p><i>Centro supports the core strategy, as it is sound and we also support Waste Objective 1: To base decisions on the need to reduce greenhouse gas emissions and to be resilient to climate change."</i></p> <p>Centro wish this to be included as part of their formal response.</p>

Respondent	Representation	Verbatim comment	Action
		waste, as helps to reduce road congestion and carbon emissions. Centro feels that freight rail connections to waste sites can in general provide a more sustainable option than road connected sites. This will help to reduce the impact on the wider transport network also.	
<b>682/3</b> Miss L Brockett, Redditch Borough Council	<b>Part:</b> Not specified <b>Legally compliant:</b> Yes <b>Sound:</b> Yes <b>Wish to participate at EiP:</b> Yes	Redditch Borough Council supports the preparation and subsequent adoption of this Waste Core Strategy. The Borough Council considers this document to be legally compliant and sound.	<b>No changes proposed.</b> Support noted.
<b>662/4</b> Cllr Mound, Tenbury Town Council	<b>Part:</b> Not specified <b>Legally compliant:</b> Yes <b>Sound:</b> Yes <b>Wish to participate at EiP:</b> No	No comments.	<b>No changes proposed.</b> Support noted.
<b>1127/5</b> K Hussain, Advantage West Midlands	<b>Part:</b> Not specified <b>Legally compliant:</b> Yes	As you may be aware, along with the other English Regional Development Agencies (RDAs), Advantage West Midlands is due to be closed by March 2012. Whilst in principle we currently	<b>No changes proposed.</b> It is noted that AWM will not be commenting on planning consultations, however the WCS has used AWM research to inform the approach.



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	<b>Sound:</b> Yes <b>Wish to participate at EiP:</b> Not specified	<p>retain a statutory consultee role for major planning applications and Local Development Frameworks, we have decided to cease our planning related activities as the organisation is focusing its decreasing resources on closure. We will not therefore be responding to future planning consultations as a statutory consultee.</p> <p>I would take this opportunity to thank you for your co-operation in consulting Advantage West Midlands and in providing an opportunity for the promotion of the delivery of the West Midlands Economic Strategy through the planning system.</p>	We have contacted AWM to see if they wish to comment on the use of data from the Locational Analysis Tool.
<b>696/6</b> Mr Yates, Herefordshire Council	<b>Part:</b> Not specified <b>Legally compliant:</b> Yes <b>Sound:</b> Yes <b>Wish to participate at EiP:</b> Not specified	No comments.	<b>No changes proposed.</b> Support noted.
<b>1665/7</b> Mr and Mrs Maybury	<b>Part:</b> Not specified <b>Legally compliant:</b> No <b>Sound:</b> No	We feel that concerns of our village about the plan for an enormous waste burner(s) have been over ridden by nameless members of planning. "Consultation" in this case has no value and we have no faith in anything the Council proposes as	<b>No changes proposed.</b> We believe that this comment relates to a planning application for an Energy from Waste facility in Hartlebury. The Planning and Regulatory Committee duly considered the application on Tuesday March 1, 2011 and the Committee unanimously resolved that its members were 'minded to

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	<p><b>Reason:</b> not justified, not effective, not consistent</p> <p><b>Wish to participate at EIP:</b> Not specified</p>	<p>a result. We dread this proposal and the resulting disruption of the excavation of acres of soil and subsoil, the movement of traffic and the site of the installation in green belt: proving the County Council cannot be trusted with the care of our beautiful county.</p>	<p>approve' the application.</p> <p>The Committee could not grant approval on the day because the Secretary of State has the option to 'call in' the application for a Government decision. The application has now been forwarded to the Secretary of State for a decision about whether his department will review the committee's decision.</p> <p>On Tuesday, May 10, the council was informed that the Secretary of State will be 'calling in' the application for his own decision. The timetable for the Public Inquiry is not yet known.</p> <p><b>Public consultation in connection with the planning application</b></p> <p>Worcestershire County Council consulted local stakeholders and residents for a 12 week period from the 19 May - 13 August 2010.</p> <p>In October 2010 the Council requested additional information from the applicant and consulted on this information from 4th - 25th November 2010.</p> <p>The planning report considered by the Committee included a detailed analysis of the application, an explanation of all relevant planning rules and details of the consultation responses. Three objectors, the local councillor and the applicant were each given five minutes to address the Committee. The whole meeting was shown live as a webcast and a total of 256 unique site visits were recorded for the live web session.</p> <p><b>Role of the Waste Core Strategy</b></p> <p>The Waste Core Strategy was not given any weight when the council's Planning and Regulatory Committee considered the application because the strategy has not been adopted or submitted to the Secretary of State for Examination.</p>

Respondent	Representation	Verbatim comment	Action
			This comment does not relate to the Waste Core Strategy, as such there are no outstanding issues for the Waste Core Strategy to address.
<b>1656/8</b> Mr Rogers	<b>Part:</b> Not specified <b>Legally compliant:</b> No <b>Sound:</b> No <b>Reason:</b> not justified, not effective, not consistent <b>Wish to participate at EiP:</b> Not specified	<p>Actively promote reduce, reuse, recycle including composting/biodigestion</p> <p>I experienced the planning farce at County Hall to discuss the Hartlebury Incinerator.</p> <p>After you have read and <u>understood</u> the arguments set out in the WAIL documents you might be able to plan properly for the disposal of waste (very little) long term.</p> <p><u>Think Again.</u></p>	<p><b>No changes proposed.</b></p> <p>The Waste Core Strategy actively promotes the management of waste at the highest level of the waste management hierarchy. It is based on the best available data (see response to <b>1730/23</b>) and is in compliance with national policy and guidance.</p> <p>See response to <b>1665/7</b> above in relation to the Hartlebury Incinerator application.</p> <p>We believe that the evidence base for the Waste Core Strategy is robust and do not intend to propose any changes to the inspector as a result of this representation.</p>
<b>908/9</b> Peter Luff MP	<b>Part:</b> Not specified <b>Legally compliant:</b> Not specified <b>Sound:</b> Not specified <b>Wish to participate at EiP:</b> Yes	<p>This response principally concerns the proposal of the Waste – to Energy Incinerator at Hartlebury and the purpose of this letter is to ask you not to include any policy encouragement for the incinerator at Hartlebury Trading Estate in Worcestershire's Waste Core Strategy Development Plan.</p> <p>Incineration is becoming an increasingly old fashioned technology, and, if adopted, the large-scale scheme will further reduce the flexibility to bring forward any emerging technology for waste disposal for at least 25 years. It is the most expensive approach, both to</p>	<p><b>No changes proposed.</b></p> <p>The Waste Core Strategy promotes the management of waste in accordance with the waste management hierarchy but is not technology specific and does not include site specific proposals. This allows for innovative technology to come forward.</p> <p>See response to <b>1665/7</b> above in relation to the Hartlebury Incinerator application.</p>

Respondent	Representation	Verbatim comment	Action
		<p>build and to operate.</p> <p>The proposed incinerator will be built on green belt land and is, therefore, as you discussed in the DPD contrary to locally established planning policies. As a sensitive time for planning in Worcestershire the precedent on green belt land is not one that I am content should be allowed to go ahead unchallenged.</p> <p>The original understanding when the current PFI contract was set up was then that North Worcestershire, South Worcestershire and Herefordshire would each play host to an element of the waste strategy. Instead my Mid Worcestershire constituency already has both the waste recycling plant at Norton and the landfill site at Wyre Piddle. It is entirely unreasonable to add a further massive waste unit. The distribution of waste disposal facilities is entirely unreasonable and places an undue burden on Wychavon.</p> <p>I hope that you will consider my points when you review the comments on the PDP.</p>	<p>The Joint Municipal Waste Management Strategy has been taken into account in developing the Waste Core Strategy; however issues relating to the PFI contract are outside of the remit of the Waste Core Strategy and have not been considered.</p> <p>This representation was been forwarded to the Council's Development Control team and the Municipal Waste Management team (on 3<sup>rd</sup> June 2011) for their information.</p>
<b>1723/10</b> Mr Chant Northamptonshire	<b>Part:</b> Not specified  <b>Legally compliant:</b> Not	The County Council considers that the approach taken to the provision of hazardous waste within the Core Strategy - that disposal treatment will	<b>Issues identified - action in progress</b>  A letter was sent to Northamptonshire County Council 13 <sup>th</sup> April 2011 outlining the approach taken to hazardous waste in the Waste Core Strategy: namely that the policies apply equally to

Respondent	Representation	Verbatim comment	Action
County Council	specified <b>Sound:</b> Not specified <b>Wish to participate at EiP:</b> Not specified	take place outside of the county - is not underpinned by evidence as to why this is either appropriate or necessary. There appears to be an assumption that those areas that already take hazardous waste for disposal/treatment will continue to do so.  It is accepted that not every county area will require to have a hazardous waste facility (as opposed to transfer facility) within their area, but the Core Strategy needs to give greater clarification over where the hazardous waste will be exported for treatment/disposal if it is not to take place within Worcestershire.	all waste streams and one of the objectives of the strategy is to achieve equivalent self-sufficiency.  Northamptonshire County Council was asked to reconsider its response in light of this information and was invited to meet to discuss any issues they have.  A follow up email was sent on 12 <sup>th</sup> May 2011.  (see <i>Appendix 1: Correspondence with Northamptonshire County Council</i> for copies of the correspondence)  Northamptonshire County Council has not yet responded.
<b>1724/11</b> A Turner Department for Communities and Local Government	<b>Wish to participate at EiP:</b> Not specified	Thank you for your letter of 22 March to Ray Colbourne at the Government Office for the West Midlands. The Government Office Network formally closed on 31 March, so your letter has been passed to me for reply, as I work in the development plans team in DCLG.  I should clarify that paragraphs 2, 3, 6, 8 and 9 under section 24 of the 2004 Act were repealed by the Local Democracy, Economic Development and Construction Act 2009. Therefore it is no longer necessary to seek a conformity opinion from either the RPB or the Secretary of State.	<b>No changes proposed.</b>  Response noted.
<b>1725/12/a</b>	<b>Part:</b> WCS9	The Coal Authority welcomes and	<b>No changes proposed.</b>

Respondent	Representation	Verbatim comment	Action
Mr Anthony B Northcote Coal Authority	<b>Legally compliant:</b> Yes <b>Sound:</b> Yes <b>Wish to participate at EiP:</b> Not specified	supports the consideration of the presence of coal resources from a mining legacy issue in this policy in criterion (e). This will ensure public safety and comply with the advice in PPG14.  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.	Support noted.
<b>1725/12/b</b> Mr Anthony B Northcote Coal Authority	<b>Part:</b> WCS12 <b>Legally compliant:</b> Yes <b>Sound:</b> Yes <b>Wish to participate at EiP:</b> Not specified	The Coal Authority welcomes and supports the consideration of the mineral sterilisation in this policy in criterion (b). Recognition of the presence of safeguarded mineral resources is in line with 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.  <i>Note: the Coal Authority also provides supporting information about their role which is not recorded here.</i>	<b>No changes proposed.</b> Support noted. Paragraph 5.58 says: <i>"Where waste management development could sterilise a safeguarded mineral deposit it may be appropriate to carry out extraction ahead of the development"</i>  This adequately covers the issues raised by the Coal Authority and as such no changes are proposed.

Respondent	Representation	Verbatim comment	Action
<b>588/13</b> Mrs J Hyrons Hartlebury Parish Council	<b>Part:</b> not specified <b>Legally compliant:</b> No <b>Sound:</b> No <b>Wish to participate at EiP:</b> Not specified	<p>I refer to your request for consideration as to whether the Waste Core Strategy complies with the legal requirements and is "sound".</p> <p>Current national thinking (including Waste Strategy for England 2007) specifies adherence to the waste hierarchy of reduce, re-use, recycle. Councillors consider this document to be unsound because it is weighted towards Energy from Waste and does not give due consideration to modern, cheaper and better alternatives which are higher up the hierarchy (eg: anaerobic digestion and front line recycling). Indeed, the current Government has stated its commitment to anaerobic digestion and greater recycling yet Worcestershire County Council has chosen to weight its Waste Core Strategy in order to support the Mercia Waste Management proposal for a mass burn incinerator.</p> <p>We consider that the weighting given to the proposed Energy from Waste facility has led to a pre-empting of conclusions for what is "needed" and has resulted in other alternatives not being treated on an equal basis with the County Council's preferred solution.</p> <p>Hartlebury Parish Council fully supports the need for residents to take responsibility for their own waste -</p>	<p><b>No changes proposed.</b></p> <p>The Waste Core Strategy is not technology specific. In line with the vision and WO3 it seeks to promote the management of waste at the highest appropriate level of the waste hierarchy. This will be implemented in particular through policies WCS1, WCS2, WCS3 and WCS14.</p> <p>Any decision regarding the methods used for the management of Municipal Waste are separate from the Waste Core Strategy which is related to the planning issues. 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.</p> <p>The JMWMS deals with how municipal waste should be managed. The Waste Core Strategy must set the policy framework by which all waste management facility developments must be assessed, including those brought forward from the JMWMS. Any application for planning permission will be determined on its merits, judged on the basis of the Development Plan, of which the Waste Core Strategy will form part.</p> <p>See response to <b>1665/7</b> in relation to the current application for an Energy from Waste facility at Hartlebury Trading Estate.</p>

Respondent	Representation	Verbatim comment	Action
		<p>effectively working towards recycling and "zero waste". We maintain that this Waste Core Strategy is flawed as it does not support the policy of working towards this - its preferred Energy from Waste facility will require constant feeding of waste which reduces the requirement for "reduce, re-use and recycle". 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 is endorsed in full and not just the parts that might suit the present planning application.</p> <p>Flexibility to handle future uncertainty towards waste disposal will not be available should this Waste Core Strategy be implemented.</p> <p>Worcestershire County Council 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.</p>	
667/14	Part: Table 3	While we agree the Upton site is an	Change proposed.



Respondent	Representation	Verbatim comment	Action
Mr S Yates Upton-upon-Severn Town Council	<b>Legally compliant:</b> Yes <b>Sound:</b> Yes <b>Wish to participate at EiP:</b> Not specified	industrial area we believe there is no spare capacity for a waste management site. If space were to become available we think the site isn't suitable for 3 reasons; 1) The area is mostly residential and has houses surrounding it on 3 sides. 2) Potential conservation problems. It overlooks the cemetery and Chapel of Rest. 3) Possible flooding problems.	It is believed that there has been some confusion regarding the location of this site and that this comment does not refer to the site in question. The Town Council have been contacted to clarify this matter. (see <i>Appendix 2: Correspondence with Upton Town Council</i> ). <b>Proposed change</b> In order to avoid future confusion postcode details will be added to all <i>areas of search</i> listed in Annex A.
<b>1718/15/a</b> Mr D Butcher Gregory Gray Associates on behalf of Sudely Development Ltd and Norton Parkway Developments	<b>Part:</b> Para 2.55 – 2.57 <b>Legally compliant:</b> Yes <b>Sound:</b> Yes <b>Wish to participate at EiP:</b> Yes	These paragraphs setting out the hierarchy of search and the geographic hierarchy set out in Figure 14 are supported and considered sustainable solutions to the distribution of waste facilities in the District. The hierarchy of search is supported and in particular, the land within Worcester "Zone a", is considered a sustainable area within which to locate new waste facilities.	<b>No changes proposed.</b> Support noted.
<b>1718/15/b</b> Mr D Butcher Gregory Gray Associates on behalf of Sudely Development Ltd and Norton Parkway Developments	<b>Part:</b> Policy WCS1 <b>Legally compliant:</b> Yes <b>Sound:</b> Yes <b>Wish to participate at EiP:</b> Yes	Policy WCS1 is supported as providing the strategic background to the site search set out in the Vision and Objectives section.	<b>No changes proposed.</b> Support noted.
<b>1718/15/c</b>	<b>Part:</b> Annex A	The preliminary assessment is supported	<b>No changes proposed.</b>

Respondent	Representation	Verbatim comment	Action
Mr D Butcher Gregory Gray Associates on behalf of Sudely Development Ltd and Norton Parkway Developments	<b>Legally compliant:</b> Yes <b>Sound:</b> Yes <b>Wish to participate at EiP:</b> Yes	in relation to site "Area 7 Industrial Park, Norton". The assessment of this site determined that a waste facility would fit within the context of the site. Some of the units are already being used for waste management. The infrastructure was considered in good condition with all roads suitable for HGVs and good access links to the M5. We wish to confirm that this site is suitable, available and deliverable in a short time scale and recommend its continued inclusion within the Development Plan Document.	Support noted.
<b>703/16</b> H Jones Tewkesbury Borough Council	<b>Part:</b> Not specified <b>Legally compliant:</b> Not specified <b>Sound:</b> Not specified <b>Wish to participate at EiP:</b> No	Thank you for giving us the opportunity to comment on the publication version of the Waste Core Strategy for Worcestershire.  We have no specific comments to make on the document at this stage but look forward to receiving a copy of the adopted strategy in due course.  Tewkesbury Borough Council reserves the right to further comment at the planning application stage of any strategic waste sites.	<b>No changes proposed.</b>  Noted.
<b>935/17</b> Mrs I Cook	<b>Part:</b> Not specified <b>Legally compliant:</b> Yes <b>Sound:</b> Yes	No comments	<b>No changes proposed.</b>  Support noted.

Respondent	Representation	Verbatim comment	Action
	<b>Wish to participate at EiP:</b> No		
<b>639/18</b> Mr Clee Rock Parish Council	<b>Part:</b> Not specified <b>Legally compliant:</b> Not specified <b>Sound:</b> Yes, but also ticked It is not effective. (Clarified 2 <sup>nd</sup> June that not effective box should not have been ticked). <b>Wish to participate at EiP:</b> No	No comments	<b>No changes proposed.</b> In response to question 3b " <i>Do you consider that the Waste Core Strategy is Sound?</i> " the respondent answered Yes. However in answer to question 4 " <i>If you consider the DPD is <u>unsound</u> please specify why</i> ", the respondent ticked "it is not effective". Mr Clee was contacted to clarify this response (25 <sup>th</sup> May 2011). A reply was received on 2 <sup>nd</sup> June 2011 to clarify that the box in question 4 should have been left blank.
<b>555/19</b> Mr Pound Clifton Upon Teme Parish Council	<b>Part:</b> All <b>Legally compliant:</b> Yes <b>Sound:</b> Yes <b>Wish to participate at EiP:</b> Not specified	No comments	<b>No changes proposed.</b> Support noted.
<b>1726/20</b> Ms P Marsh	<b>Part:</b> Not specified <b>Legally</b>	The strategy seems to be comprehensive and robust. I was interested to see if there were details of what can be recycled in the area as there are gaps at	<b>No changes proposed.</b> Support noted.

Respondent	Representation	Verbatim comment	Action
	<b>compliant:</b> Yes <b>Sound:</b> Yes <b>Wish to participate at EiP:</b> No	present. That said, the ability to recycle is good and improving. Thank you.	
<b>678/21</b> Mrs P Harrison Wythall Parish Council	<b>Part:</b> Not specified <b>Legally compliant:</b> Not specified <b>Sound:</b> Not specified <b>Wish to participate at EiP:</b> Not specified	My Council, having studied this document, do not feel able to make any comment as the proposals do not appear to affect Wythall.	<b>No changes proposed.</b> Comment noted.
<b>1280/22</b> Mrs C Hemming British Waterways	<b>Part:</b> 2.16 <b>Legally compliant:</b> No <b>Sound:</b> No <b>Reason:</b> not justified <b>Wish to participate at EiP:</b> Not specified	The paragraph is not justified in that the Waste Core Strategy should: Be founded on a robust and credible evidence base. The evidence base should contain two elements: <ul style="list-style-type: none"> <li>Participation: Evidence of the views of the local community and others who have a stake in the future of the area.</li> <li>Research/fact finding: Evidence that the choices made in the Waste Core Strategy are backed up by the background facts.</li> </ul> Q4. The paragraph and therefore the	<b>Issues identified - change to be proposed.</b> <b>Proposed change</b> to paragraph 2.16 <i>"The canal network is extensive and connects to systems to the north, south and east of the County. Worcester (Worcester &amp; Birmingham canal) and Stourport (Staffordshire &amp; Worcestershire Canal) are placed on the river and canal network and the Droitwich Canals have recently undergone restoration to link to the River Severn and the Worcester &amp; Birmingham Canal. There are however some limitations on vessel size due to the locks on or between the canals. <b>Though there is and there is</b> little likelihood of increased freight traffic on the county's canals in the foreseeable future, <b>there is more potential for the use of the River Severn.</b> The Waste Core</i>

Respondent	Representation	Verbatim comment	Action
		<p>DPD is unsound as the phrase “there is little likelihood of increased freight traffic on the county's canals in the foreseeable future” .does not apply to the River Severn which is used for the transportation of goods and materials and it is envisaged that this will continue into the foreseeable future and possibly increase through the sustainable use of technology, and the cost of road fuel.</p> <p>Q5. The above paragraph could be amended to read “though the use of the canals for freight is unlikely in the next 15 years there is more potential for the use of the River Severn.”</p> <p>This would fit with the requirements of paragraph 4.10 that requires all proposals to submit an assessment of connectivity of the site, with specific reference to the potential for using alternatives to road transport. This assessment should:</p> <ul style="list-style-type: none"> <li>• Identify potential connections to: <ul style="list-style-type: none"> <li>• The waterways network;</li> <li>• The rail network ; and</li> <li>• The strategic highway network.</li> </ul> </li> <li>• Assess the quality of the connections, including:</li> </ul>	<p><i>Strategy encourages the consideration of freight transport by water where possible, but recognises that potential is limited."</i></p> <p>British Waterways were contacted (email sent 28<sup>th</sup> April 2011, follow up email sent 24<sup>th</sup> May 2011) to ask whether in their opinion this change would make the Waste Core Strategy sound and legally compliant.</p> <p>A response was received on 24<sup>th</sup> May stating that they agree with this wording and raise no further objections.(see <i>Appendix 3: Correspondence with British Waterways</i>)</p>

Respondent	Representation	Verbatim comment	Action
		<ul style="list-style-type: none"> <li>• Capacity of the local and strategic transport network;</li> <li>• Suitability for vehicles/vessels; and</li> <li>• Loading and unloading opportunities.</li> </ul> <p>Identify how these connections will be used throughout the lifetime of the proposal and where alternatives to road transport are not used this should be clearly justified.</p> <p>Dredging and canal excavation material can be conveniently recycled and reprocessed at canal side locations, through arrangements with adjacent landowners and developers.</p> <p>BW has a preference to locate both processing plants and collection sites in urban/brownfield areas adjacent to the waterways where the potential for movement of this low value product can be transported if the energy costs and technology makes this cost effective in the future. This is provided the amenities of adjacent occupiers and canal users are protected, including impact on water levels, pollution of the water, and effect on biodiversity and water quality of the canals. The resultant visual impact and noise from waste operations is experienced by users of the navigations</p>	<p><b>No changes proposed.</b></p> <p>The Council believes that the proposed policy framework would be adequate to assess any such proposal. British waterways were contacted (email sent 28<sup>th</sup> April 2011, follow up email sent 24<sup>th</sup> May 2011) to confirm whether they are in agreement. An email response was received on 24<sup>th</sup> May confirming no further objection.</p>

Respondent	Representation	Verbatim comment	Action
		e.g. boaters, walkers, cyclists, etc. and the impact on the canal corridor environment should be kept to a minimum.	
<b>1730/23</b> Mr Townley  <b>1727/31</b> Mr S Field  <b>1728/32</b> Mr N Blundell  <b>1729/33</b> Mrs S Blundell  <b>1644/51</b> Mr M Hemmings  <b>1761/55</b> OM & PR Howe  <b>1760/56</b> Mr & Mrs P	<b>Part:</b> 1.8, 2.47, 2.48, WCS3, Figure 16  <b>Legally compliant:</b> Not specified  <b>Sound:</b> No  <b>Wish to participate at EiP:</b>  1730/23 – Not specified  1727/31 – No  1728/32 – Not specified  1729/33 – Not specified  1644/51 – Not specified  1761/55 – Not specified  1760/56 – Yes  1759/57 – Not	<p>Your online document is difficult to follow. So I am sending my own letter, and hope that this will be treated with equal importance. I am against mass burn incineration.</p> <ul style="list-style-type: none"> <li>I am concerned at the timing of the consultation, as 3 weeks of this period over Easter and Royal wedding, when many people are away. <b>I am not confident that community views have shaped the Waste Core Strategy.</b></li> <li>Paragraph 1.8, states that predicted waste arisings are based on the best available data. Waste is falling dramatically and consistently, recycling is only at half potential capacity, so it is difficult to understand the assumption that waste will increase so dramatically in the coming years. For a Waste Strategy to be considered 'sound' it must arise</li> </ul>	<p><b>Change proposed.</b></p> <p>The response form was designed to focus comments on the issues of soundness and legal compliance, however all representations will be forwarded to the inspector for consideration.</p> <p>Your comments about the consultation period are noted. The consultation was listed on the council's online consultation portal a month in advance and Parish councils were also written to in advance to enable them to arrange meetings to discuss the WCS if they felt this to be necessary.</p> <p>The Waste Core Strategy has been subject to formal consultation at 3 previous stages and reports have been prepared at each stage outlining how consultation comments have been taken into account. Positive feedback has also been received from respondents that feel their views have shaped the development of the Waste Core Strategy.</p> <p>The bases behind the projections were included in previous consultation documents, however the assumptions behind them are complex and in order to keep the publication document as clear and concise as possible, full details of the data options considered and used, as well as risk assessments for the approaches used, are contained in the <i>Worcestershire Waste Core Strategy Background Document: "Arisings and capacity"</i>, available on our website <a href="http://www.worcestershire.gov.uk/wcs">www.worcestershire.gov.uk/wcs</a>. This background document is available for comment on our website.</p> <p>Although the most accurate data has been chosen as far as</p>

Respondent	Representation	Verbatim comment	Action
<p>Morris</p> <p><b>1759/57</b></p> <p>Mr ND Jukes</p> <p><b>1758/58</b></p> <p>M Tranter</p> <p><b>1757/59</b></p> <p>R Tranter</p> <p><b>1756/60</b></p> <p>Mrs T Walkden</p> <p><b>1754/62</b></p> <p>S Derricut</p> <p><b>1753/63</b></p> <p>Mr &amp; Mrs GR Knowles</p> <p><b>1752/64</b></p> <p>Mr &amp; Mrs Bayliss</p>	<p>specified</p> <p>1758/58 – Not specified</p> <p>1757/59 – Not specified</p> <p>1756/60 – Not specified</p> <p>1754/62 – Not specified</p> <p>1753/63 – No</p> <p>1752/64 – Not specified</p> <p>1751/65 – Not specified</p> <p>1750/66 – Not specified</p> <p>1749/67 – Not specified</p> <p>1748/68 – Not specified</p> <p>1747/69 – Not specified</p> <p>1740/70 – Not specified</p> <p>1746/71 – No</p> <p>1745/72 – Not</p>	<p>from a sound evidence base, and as no sound evidence of an impending jump in arisings is offered, the proposed Strategy cannot be considered 'sound'. <b>How accurate is the data?</b></p> <ul style="list-style-type: none"> <li>Paragraph 2.47 states that "Cross boundary movement of waste is normal for facilities to remain viable" <b>Are local facilities importing waste to remain viable?</b></li> <li>Paragraph 2.48 states that <b>imports of county waste exceed exports</b>. There is also a statement that there will be <b>no limit</b> on the <b>export or import of waste</b>. Yet we are told that this facility is needed to deal with local residual waste.</li> </ul>	<p>possible, a worst-case approach has been taken and therefore over-estimates the amount of waste arising over the period of the Waste Core Strategy. This is in order not to constrain development by underestimating the level of need.</p> <p>Reference to the background document is made throughout the Publication Document.</p> <p>Waste is similar to any other commodity in that it is influenced by market forces and therefore waste movements across local authority boundaries are inevitable. The Waste Core Strategy is concerned with all waste, including commercial and industrial waste, agricultural waste, construction and demolition waste, hazardous, clinical and radioactive waste, as well as municipal solid waste. Some wastes require specialist management. For instance, one of the county's waste management companies reprocesses waste to extract and recycle precious metals. The economies of scale for this type of process are such that it is not feasible for this to be managed at a local level and this particular facility performs a national function. The Waste Core Strategy is not able to impose barriers to the movement of waste. It employs the concept of 'equivalent self-sufficiency' to take account of this, thereby enabling the provision of capacity which is sufficient to manage the quantities of waste produced in Worcestershire.</p> <p>The Waste Core Strategy is not able to impose barriers to the movement of waste. It employs the concept of 'equivalent self-sufficiency' to take account of this, thereby planning for facilities to manage the amount of waste equivalent to the county's arisings.</p> <p>Waste is similar to any other commodity in that it is influenced by market forces and therefore waste movements across local authority boundaries are inevitable. The Waste Core Strategy is</p>



Respondent	Representation	Verbatim comment	Action
<b>1751/65</b> G Phillips  <b>1750/66</b> L Lawman  <b>1749/67</b> C Harris  <b>1748/68</b> WD Harris  <b>1747/69</b> Mr R Ward  <b>1740/70</b> Mr Tom Brookes  <b>1746/71</b> T Culloty	specified 1744/73 – Not specified 1743/74 – Not specified 1742/75 – Not specified 1741/76 – Not specified 1739/77 – Not specified 1738/78 – Not specified 1737/79 – Not specified 1650/88 – Not specified 1644/89 – Not specified	<ul style="list-style-type: none"> <li>It is claimed that no new landfill capacity will be needed. However <b>POLICY WCS3</b> states there will be no more landfill <b>EXCEPT FOR WHEN THERE IS WASTE WHICH CANNOT BE RECOVERED OR RECYCLED</b>. Is this for the 50,000 tonnes of ash produced by incineration?</li> <li>Mining <b>historical</b> landfills indicates an anticipated lack of waste, and the need to dispose of large amounts of un-usable incinerator ash. Is this correct? Is the council aware that disturbances of a landfill may cause slippage and release large quantities of methane which is currently captured and fed to the national grid.</li> </ul>	<p>concerned with all waste, including commercial and industrial waste, agricultural waste, construction and demolition waste, hazardous, clinical and radioactive waste, as well as municipal solid waste. Some wastes require specialist management. For instance, one of the county's waste management companies reprocesses waste to extract and recycle precious metals. The economies of scale for this type of process are such that it is not feasible for this to be managed at a local level and this particular facility performs a national function.</p> <p>See response to 1665/7 in relation to the current application for an Energy from Waste facility at Hartlebury Trading Estate.</p> <p>Policy WCS2 requires the satisfactory management or disposal of any residues from 'other recovery' facilities, it will be a matter for applicants to consider how to achieve this as part of their proposals.</p> <p>It should be noted that the <b>Publication document</b> was finalised before the application was considered by the Planning and Regulatory Committee (Tuesday March 1) and the Secretary of State has not yet determined this application, as such it is not yet known whether the energy from waste facility will be permitted.</p> <p>Paragraph 3.26 makes reference to potential future 'landfill mining' proposals. This refers to the potential for materials such as metals to be recovered from historic landfills. It does not indicate an 'anticipated lack of waste' and at present such proposals seem unlikely. The council is aware of the potential hazards such a proposal could bring, and paragraph 3.26 makes clear that the Environment Agency would need to be consulted about any landfill mining proposal.</p>

Respondent	Representation	Verbatim comment	Action
1745/72 N Culloty		<ul style="list-style-type: none"> <li>There are serious concerns that carbon emissions will be greatly increased by incineration.</li> </ul>	<p>The Waste Core Strategy is not technology specific.</p> <p>In line with the vision and WO3 it seeks to promote the management of waste at the highest appropriate level of the waste hierarchy. This will be implemented in particular through policies WCS1, WCS2, WCS3 and WCS14. Emissions are regulated by the Environment Agency and will vary depending on the technology used and types of waste managed.</p> <p>Paragraph 2.22 summarises some of the findings of the background document "<i>Climate change and waste management in Worcestershire</i>". The relationship between waste management and climate change, including greenhouse gases, has been considered and this paragraph highlights the balance between greenhouse gas production, reduction and energy or resource benefits from waste management activities.</p>
1744/73 Ms R Krivosic			
1743/74 Mr M Krivosic			
1742/75 T Sealey			
1741/76 SM Sealey		<ul style="list-style-type: none"> <li>The Waste Core strategy seems to make <b>selective provision</b> for protection of the Green Belt, offering no protection to the local amenity in and around a large incinerator.</li> </ul>	<p>Policy WCS10 sets out the approach to development of waste management facilities in the Green Belt in accordance with national policy (Planning Policy Statement 2). Amenity issues are considered in policy WCS11.</p> <p>Minor amendments are proposed to make more explicit reference to 'very special circumstances' as set out in national policy (see response to 1679/49g).</p>
1739/77 Ms S Brookes			
1738/78 A Brookes		<ul style="list-style-type: none"> <li><b>Reference is made to the construction of bunds, embankments, and features for noise attenuation and landscaping for noise mounds. This is very concerning.</b></li> </ul>	<p>Paragraph 3.24 makes reference to these features to highlight that they would be considered against policy WCS3 (Landfill). This is to avoid ambiguity. It does not actively encourage such features.</p> <p>To improve clarity we propose the following change:</p> <p><b>Proposed change</b></p> <p>Paragraph 3.24 "...Proposals for this type of development will be considered against <del>this policy</del> <b>policy WCS 3: Landfill and</b></p>
1737/79 R Wrench			

Respondent	Representation	Verbatim comment	Action
<p><b>1650/88</b> S Tranter</p> <p><b>1644/89</b> Mrs J Hemmings</p>		<ul style="list-style-type: none"> <li><b>Figure 16 does not include the cost of gate fees of incineration; the method already chosen.</b> This lacks transparency and fails to demonstrate value for money for the tax payer.</li> </ul> <p><b>I feel that the Waste Core Strategy is not sound and have great concerns over its implementation.</b></p>	<p><i>Disposal"</i></p> <p>The Waste Core Strategy is technology neutral. Figure 16 is reproduced from a regional study by Advantage West Midlands, "Waste – Future Resource for Business" (2008). The report does not include equivalent information for other treatment methods and this information is not readily available elsewhere. It is intended to indicate relative costs across various waste management options to demonstrate that recycling technologies will be increasingly viable over the life of the Strategy. Although we recognise that Incineration or Energy from Waste facilities are not shown in Figure 16, we do not have the information available to supplement this study. As the figure is intended to be indicative and the Waste Core Strategy is not technology specific this is not considered to be an issue of soundness.</p> <p>Noted, the strategy includes detailed sections specifically setting out how it will be implemented and monitored. This issue will be considered by the Inspector when examining the submitted Waste Core Strategy.</p>
<p><b>1640/24</b> Mr Vernon</p>	<p><b>Part:</b> Not specified.</p> <p><b>Legally compliant:</b> No</p> <p><b>Sound:</b> No</p> <p><b>Wish to participate at EiP:</b> Not specified</p>	<p>I found the instructions and form to be quite complicated and difficult for me to decide which comment related to legality etc. Please accept these comments in this form.</p> <p>I believe the WCS addresses the vast majority of the Government requirements. BUT I believe it to be fundamentally UNSOUND because of the basic document informing it. For the same reason I doubt (but am not qualified to judge) its legal compliance.</p>	<p><b>No changes proposed.</b></p> <p>The response form was designed to focus comments on the issues of soundness and legal compliance, however all representations will be forwarded to the inspector for consideration.</p>

Respondent	Representation	Verbatim comment	Action
		<p>Annex D of the JWMMS 2009 actually started life in 2004 and revised very little since then. It did not properly consider all the options. Ecodeco is not Anaerobic digestion.</p> <p>The WCS whilst fundamentally concerned with waste disposal should also marry that with collections. The WCS is not there for Effective. There is little flexibility and does not deliver the waste hierarchy as composting and AD are higher up the hierarchy than energy recovery for example.</p> <p>This strategy seems to me to have been written to permit the proposed Hartlebury Incinerator; which itself fails to deliver the hierarchy as it will burn materials that can be recycled higher up the hierarchy.</p> <p>Mrs Tilley herself stated in her comments at the planning meeting that she was under no legal requirement to consider all options. That planning application was also based on annexe D or the emerging preferred options report ( same report different authors)</p> <p>If the options were not fully considered there and the WCS is informed by the same report then the similarly insufficient work has been performed to satisfy the Secretary of State that the WCS is flexible enough to survive 15 years of</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. Annex D of the JMWMS and Emerging Preferred Options report are very separate, serving different purposes.</p> <p>Annex D of the JMWMS assesses alternative treatment options for municipal waste. The WCS Emerging Preferred Options report on the other-hand is technology neutral and sets out alternative approaches developing a policy framework for determining planning proposals.</p> <p>The Waste Core Strategy is not technology specific. See response to <b>1665/7</b> for further details relating to the proposed development at Hartlebury.</p> <p>Whilst the evidence base of the JMWMS has informed the Waste Core Strategy, any application for planning permission will be determined on its merits, judged on the basis of the Development Plan, of which the WCS forms part.</p>

Respondent	Representation	Verbatim comment	Action
		<p>uncertainty.</p> <p>Waste must be treated as high up the hierarchy as possible. The energy recovery is only just better than landfill, but separation and composting or digestion with greater recycling must be the sane and legally preferred option.</p> <p>The green belt must also be protected as detailed by the secretary of state for communities and local government but the WCS would allow certain green belt development and I believe that this is contrary to national policy currently and as will be published this summer.</p>	<p>In line with the vision and WO3 it seeks to promote the management of waste at the highest appropriate level of the waste hierarchy. This will be implemented in particular through policies WCS1, WCS2, WCS3 and WCS14.</p> <p>Minor amendments are proposed to make more explicit reference to 'very special circumstances' as set out in national policy (see response to 1679/49g).</p>
<b>1081/25</b> Mr S Bloomfield Worcestershire Wildlife Trust	<b>Part:</b> Whole document. <b>Legally compliant:</b> Yes <b>Sound:</b> Yes <b>Wish to participate at EiP:</b> No	<p>We consider that the strategy has been based on adequate biodiversity information, and takes appropriate steps to conserve and enhance biodiversity to allow it to be considered legally compliant and sound.</p>	<p><b>No changes proposed.</b></p> <p>Support noted.</p>
<b>1732/26</b> Mrs D Maughan	<b>Part:</b> 1.8,1.9, 2.2, 2.10 <b>Legally compliant:</b> Not specified <b>Sound:</b> No	<p>Incineration was already the only option available to WCC as contracts and land purchase had been finalized before the WCS was finished. There was no consideration given to other options even though incineration is very low on the list of methods for disposal of waste. The</p>	<p><b>No changes proposed.</b></p> <p>The Waste Core Strategy is not technology or site specific.</p> <p>In line with the vision and WO3 it seeks to promote the management of waste at the highest appropriate level of the waste hierarchy. This will be implemented in particular through policies WCS1, WCS2, WCS3 and WCS14.</p>

Respondent	Representation	Verbatim comment	Action
	<p><b>Reason:</b> not justified, not effective, not consistent</p> <p><b>Wish to participate at EiP:</b> No</p>	<p>document does not make allowance for the improvement to the rates or recycling which are improving but can be improved to 80%-90%. If those were achieved (and it is possible as others have shown) this incinerator would have to draw waste from further afield. This has serious implications for climate change which is already the worst option as far as green technology is concerned. Green belt land would be compromised by this proposal as would the look and feel of the surrounding countryside at a time when the local economy is seeking to attract tourists to attractions such as the County Museum and Castle. The visual impact of this proposal on the local community cannot be understated as the scale of the building dwarfs any thing else in the vicinity.</p>	<p>Any decision regarding the methods used for the management of Municipal Waste are separate from the Waste Core Strategy which is related to the planning issues. 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.</p> <p>The JMWMS deals with how municipal waste should be managed. The Waste Core Strategy must set the policy framework by which all waste management facility developments must be assessed, including those brought forward from the JMWMS. Any application for planning permission will be determined on its merits, judged on the basis of the Development Plan, of which the Waste Core Strategy will form part.</p> <p>See response to 1665/7 in relation to the current application for an Energy from Waste facility at Hartlebury Trading Estate.</p>
<p><b>1731/27</b></p> <p>Mr P Davies</p> <p>Severn Trent Water</p>	<p><b>Part:</b> WCS8</p> <p><b>Legally compliant:</b> Yes</p> <p><b>Sound:</b> Yes</p> <p><b>Wish to participate at EiP:</b> Not specified</p>	<p>This is a generic response supporting the Waste Core Strategy.</p> <ul style="list-style-type: none"> <li>Severn Trent Water considers that the proposals will not have a detrimental effect on groundwater quality; the Environment Agency Groundwater Source Protection Zone policy provides guidance on development.</li> <li>The proposals will not have a detrimental impact on the water quality at water supply surface</li> </ul>	<p><b>No changes proposed.</b></p> <p>Support noted.</p>

Respondent	Representation	Verbatim comment	Action
		<p>water abstraction sites, classified by the Environment Agency as surface water Drinking Water Protected Areas.</p> <ul style="list-style-type: none"> <li>• They will not significantly impact on the water resources or natural surface water and groundwater flows.</li> <li>• They will not significantly impact on biodiversity of groundwater supported systems ecosystems or surface water courses; they may even be designed to enhance biodiversity.</li> <li>• The proposals 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.</li> </ul>	
<b>422/28</b> Mrs S Barfield Brintons	<b>Part:</b> Not specified <b>Legally compliant:</b> Not specified <b>Sound:</b> Not specified <b>Wish to participate at</b>	No comment to make.	<b>No changes proposed.</b>

Respondent	Representation	Verbatim comment	Action
	<b>EiP:</b> No		
<b>1649/29 a</b> Mrs E Jones	<p><b>Part:</b> Not specified</p> <p><b>Legally compliant:</b> Not specified</p> <p><b>Sound:</b> Not specified</p> <p><b>Wish to participate at EiP:</b> Not specified</p>	<p>I welcome the opportunity to respond to the Worcestershire County Council Waste Core Strategy Development Plan Document. I have previously responded to your questionnaire for the Waste Core Strategy for Worcestershire First Draft Submission which I understand is on the council's database. However, I believe that the response form and the Publication Document (regulation 27) are designed in such a way that it is now more difficult for the general public to be able to respond to.</p> <p>It also appears to be written around the waste contractors only option of using one large facility – that of incineration. Worcestershire County Council has failed to show that it has considered alternative waste management options. There appears to be a complete absence of external scrutiny and no published evidence of internal scrutiny.</p> <p>A National Assembly for Wales consultation paper December 2007 estimated that up to 93.3 per cent of municipal waste could either be recycled or composted/anaerobically digested. It showed the most cost effective recycling</p>	<p><b>No changes proposed.</b></p> <p>The Publication Document (Regulation 27) is written as the final version of the Waste Core Strategy which we intend to submit to the Secretary of State for examination. Subject to any changes recommended by the Planning Inspector following this consultation and the Examination in Public, this is the document which will become the adopted Development Plan Document and form part of the Development Plan for Worcestershire, and therefore needs to be fit for purpose to provide planning policy for both decision makers and developers to utilise. This statutory consultation focuses on issues of soundness and legal compliance of the document, therefore it was not appropriate to produce a summary version. The response form was designed to focus comments on the issues of soundness and legal compliance.</p> <p>The Waste Core Strategy is not technology or site specific.</p> <p>In line with the vision and WO3 it seeks to promote the management of waste at the highest appropriate level of the waste hierarchy. This will be implemented in particular through policies WCS1, WCS2, WCS3 and WCS14.</p> <p>Any decision regarding the methods used for the management of Municipal Waste are separate from the Waste Core Strategy which is related to the planning issues. 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.</p> <p>The JMWMS deals with how municipal waste should be managed. The Waste Core Strategy must set the policy</p>



Respondent	Representation	Verbatim comment	Action
		<p>level for 2024/5 would be 80 per cent of the waste. Wales and Scotland are aspiring to 70 per cent recycling in their waste strategies. These levels of recycling are exceeded in parts of Europe. The Audit Commission consider 70 per cent of household waste to be 'readily recyclable' (2008, Well disposed paragraph 140.) and in paragraph 47 it is noted that 70 per cent of MSW is biodegradable and "suitable for composting/anaerobic digestion". They also say in their Well Disposed report that if WDA's overestimate future volumes of waste arisings they may also achieve a worse environmental solution, if by building large facilities they reduce their own financial incentives to pursue waste reduction or recycling incentives.</p> <p>An assessment of the 2009 MSW statistics published by Defra shows that none of the top 5 incineration authorities rank in the top 100 recycling authorities. Dr Paul Leinster Chief Executive of the Environment Agency is quoted as saying "what we should not be doing is having incinerators which then mean minimisation, re-use, recycling gets impacted. I do have concerns over locking technologies in on a 25 year basis when technologies are moving as fast as they do."</p> <p>Lewisham, Portsmouth and Sheffield</p>	<p>framework by which all waste management facility developments must be assessed, including those brought forward from the JMWMS. Any application for planning permission will be determined on its merits, judged on the basis of the Development Plan, of which the Waste Core Strategy will form part.</p> <p>See response to 1665/7 in relation to the current application for an Energy from Waste facility at Hartlebury Trading Estate.</p>

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		<p>incinerators operated by Veolia have resulted in poor recycling rates.</p> <p>There seems to be a complete lack of consideration of obligations under the Stockholm Convention and associated legislation for example POPs.</p> <p>Waste Strategy for England 2007 stated that the government is going to review its targets for 2015-2020 to see if they can be made more ambitious.</p> <p>The Coalition Government's policy encompasses a zero approach and is currently looking at an anaerobic digestion framework.</p>	<p>The Stockholm Convention and POPs were considered on page 23 of the background document "<i>Recovering Energy From Waste: Thermal And Biological Treatment Technologies</i>" available on our website <a href="http://www.worcestershire.gov.uk/wcs">www.worcestershire.gov.uk/wcs</a>.</p> <p>We are aware of the current national review of waste policy and the likelihood of ambitious targets. However, the review has not yet presented any results or new targets, and therefore the Waste Core Strategy and its targets are based on the best available evidence. The options considered are set out in the background document "<i>Arising and capacity</i>", available on our website <a href="http://www.worcestershire.gov.uk/wcs">www.worcestershire.gov.uk/wcs</a>.</p>
<p><b>1649/29 b</b> Mrs E Jones</p>	<p><b>Part:</b> Waste Figures <b>Legally compliant:</b> Not specified <b>Sound:</b> Not specified <b>Wish to participate at EiP:</b> Not specified</p>	<p>Better management of the waste resource is not properly addressed within this document.</p> <p>a. Research has shown that up to 80 per cent of the household waste stream can be recycled, incineration does not address the problem of resource efficiency. Within Worcestershire and Herefordshire there are many opportunities for better re-use and recycling.</p> <p>b. I would question the waste figures within this document. Waste figures in other counties are reducing whilst waste</p>	<p><b>No changes proposed.</b></p> <p>a. and c. In line with the vision and objective WO3, the Waste Core Strategy seeks to promote the management of waste at the highest appropriate level of the waste hierarchy. This will be implemented in particular through policies WCS1, WCS2, WCS3 and WCS14.</p> <p>b. The waste figures used represent a worst-case scenario in order not to frustrate waste management development. The alternatives for establishing these figures are discussed in the</p>

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		<p>from Worcestershire is predicted to increase.</p> <p>c. This document has not shown enough waste minimisation, improvement of recycling and composting to guide the counties through to 2027.</p> <p>d. Ash residue is not properly addressed in this document. There is no mention of the potential 40,000 thousand tonnes of incinerator bottom ash that would go to landfill should there be no market for this. As there is currently 21,000 tpa being imported from out of county and land filled in Hartlebury and 6 million tonnes of power station ash (which is a more proven product) being land filled in the UK there is unlikely to be any potential users for IBA. Many extra road miles are involved in disposing of incinerator fly and bottom ash. The document admits that importing waste would be inevitable.</p> <p>e. The Proximity Principle has not been given enough consideration.</p> <p>Paragraph 9 of PPS1 Supplement on Climate Change places a duty on local authorities to "secure the highest viable resource and energy efficiency and reduction in emissions". Strategies that allow or even encourage the mass burn incineration of plastics, food waste and other recyclables and compostable</p>	<p>background document "<i>Arising and capacity</i>", available on our website <a href="http://www.worcestershire.gov.uk/wcs">www.worcestershire.gov.uk/wcs</a>. The figures for MSW are based on a stable level of arisings from each household, but with an increase in the number of households over the life of the Strategy.</p> <p>d. Policy WCS2 part a iii and paragraph 3.15 require any residues from 'other recovery' facilities to be satisfactorily managed and disposed of.</p> <p>The waste core strategy does not seek to limit imports or exports of waste but is based on the concept of 'equivalent self-sufficiency'.</p> <p>e. The Proximity Principle no longer forms part of national policy.</p> <p>In line with the vision and WO3 it seeks to promote the management of waste at the highest appropriate level of the waste hierarchy. This will be implemented in particular through policies WCS1, WCS2, WCS3 and WCS14.</p> <p>The Waste Core Strategy is not technology specific.</p>

Respondent	Representation	Verbatim comment	Action
		<p>discarded material that could viably dealt with in ways that would be less damaging to the environment would go against government policy.</p> <p>The government acknowledged in Waste Strategy 2007 that "burning plastics has a general net adverse greenhouse gas impact". Fichnter for the Environmental Services Association said "all analysis confirms that the combustion of plastic in an inefficient power plant has an adverse impact on climate".</p>	
<p><b>1649/29 c</b> Mrs E Jones</p>	<p><b>Part:</b> Climate change <b>Legally compliant:</b> Not specified <b>Sound:</b> Not specified <b>Wish to participate at EiP:</b> Not specified</p>	<p>This document does not adequately address the issues of climate change. Incineration is by far the worst option in terms of climate change.</p> <p>a. Waste Strategy for England have acknowledged that "burning plastics has a general net, adverse greenhouse gas impact due to the release of fossil carbon" which can "outweigh the returns of energy recovery".</p> <p>b. Associated with one large facility is heavy local traffic levels and heavy vehicle pollution.</p> <p>c. Incineration increases the emissions of greenhouse gases compared to recycling.</p> <p>d. Incinerators burn fossil fuels when burning plastics.</p> <p>e. An incinerator burns three times more</p>	<p><b>No changes proposed.</b></p> <p>Climate change issues are considered in detail in the background document "<i>Climate change and waste management in Worcestershire</i>" available on our website <a href="http://www.worcestershire.gov.uk/wcs">www.worcestershire.gov.uk/wcs</a>.</p> <p>Climate change issues form an integral part of the vision and objectives. One way in which these are addressed is through objective WO3 which seeks to promote the management of waste at the highest appropriate level of the waste hierarchy. This will be implemented in particular through policies WCS1, WCS2, WCS3 and WCS14.</p> <p>The Waste Core Strategy is not technology specific.</p> <p>See response to 1665/7 in relation to the current application for an Energy from Waste facility at Hartlebury Trading Estate.</p>

Respondent	Representation	Verbatim comment	Action
		<p>CO2 than the national grid for the same amount of electricity production.</p> <p>f. Several smaller units designed to treat biodegradable waste closer to the waste arisings would reduce road miles and transport emissions (and be significantly cheaper).</p> <p>Presently the contractor collects commingled waste, this is reported as the most undesirable method as maintaining quality is a defining factor in achieving best possible value. Research by the Welsh Assembly government found kerbside sort makes more sense. It is well documented that the UK reprocessing industry is short of good quality recyclate and that markets from abroad are also less likely to accept commingled recyclate.</p> <p>There has been little public engagement and no public meetings to discuss alternatives or the implications to surrounding areas by the local authority. The Environment Agency held a public meeting, which the public were told the County Council had been invited but no representative attended. The only contact with people most affected by one large facility – that of incineration, has been an exhibition by the contractor. At this exhibition the contractor stated that "the company are contracted to dispose of the waste and it is their choice which</p>	

Respondent	Representation	Verbatim comment	Action
		method is used". So it would appear that the Waste Core Strategy is largely a paper exercise. Incinerators create very few employment opportunities unlike the recycling industry. Incinerator operators make their gains through long term contracts with local authorities while the local taxpayer contributes to their profits.	
<b>1649/29 d</b> Mrs E Jones	<b>Part:</b> 1.8 <b>Legally compliant:</b> Not specified <b>Sound:</b> Not specified <b>Wish to participate at EiP:</b> Not specified	You state that the Waste Core Strategy is designed to be flexible and technology neutral. However incineration is the only technology the council's contractor is prepared to consider which is the most inflexible and not able to be modular and the most difficult to decommission.	<b>No changes proposed.</b> The Waste Core Strategy applies to all 'directive wastes', including commercial and industrial, construction and demolition, hazardous and municipal waste. Any decision regarding the methods used for the management of Municipal Waste are separate from the Waste Core Strategy which is related to the planning issues. 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. The JMWMS deals with how municipal waste should be managed. The Waste Core Strategy must set the policy framework by which all waste management facility developments must be assessed, including those brought forward from the JMWMS. Any application for planning permission will be determined on its merits, judged on the basis of the Development Plan, of which the Waste Core Strategy will form part. See response to 1665/7 in relation to the current application for an Energy from Waste facility at Hartlebury Trading Estate.
<b>1649/29 e</b>	<b>Part:</b> 1.9	The public have been told categorically	<b>No changes proposed.</b>

Respondent	Representation	Verbatim comment	Action
Mrs E Jones	<b>Legally compliant:</b> Not specified <b>Sound:</b> Not specified <b>Wish to participate at EiP:</b> Not specified	that no waste would be imported from outside of the two counties. Yet this document I understand recognises that waste would need to be imported.	Some imports and exports of waste are inevitable as they reflect the normal working of the private sector economy. The Waste Core Strategy is concerned with all waste, including commercial and industrial waste, agricultural waste, construction and demolition waste, hazardous, clinical and radioactive waste, and municipal solid waste. These wastes are managed by private companies and the Waste Core Strategy is not able to impose barriers to the movement of waste. It employs the concept of 'equivalent self-sufficiency' to take account of this, thereby planning for facilities to manage the amount of waste equivalent to the county's arisings.
<b>1649/29 f</b> Mrs E Jones	<b>Part:</b> 2.10 <b>Legally compliant:</b> Not specified <b>Sound:</b> Not specified <b>Wish to participate at EiP:</b> Not specified	The Grade I agricultural land should be protected from any technology that threatens it. Also the neighbouring fragile heathland at Hartlebury Common.	<b>No changes proposed.</b> Policy WCS4 sets out types of compatible land uses. Greenfield land is only identified as compatible for waste water treatment facilities, open windrow composting or landfill where strongly justified. Environmental assets such as Hartlebury Common are protected by policy WCS7.
<b>1649/29 g</b> Mrs E Jones	<b>Part:</b> 2.22 <b>Legally compliant:</b> Not specified <b>Sound:</b> Not specified <b>Wish to participate at EiP:</b> Not specified	Biodegradable (food) waste is presently being collected by Wychavon, this could be extended to the two counties. I understand it is illegal to landfill this.	<b>No changes proposed.</b> Waste collection methods are beyond the remit of the Waste Core Strategy. The EU Landfill Directive sets targets for the UK and other EU countries to reduce the amount of biodegradable municipal waste sent to landfill. The UK is obligated to reduce the amount sent to landfill based on the amount landfilled in 1995 to 75% by 2010, to 50% by 2013 and to 35% by 2020. The Waste Core Strategy takes account of this.

Respondent	Representation	Verbatim comment	Action
<b>1649/29 h</b> Mrs E Jones	<b>Part:</b> 2.2 <b>Legally compliant:</b> Not specified <b>Sound:</b> Not specified <b>Wish to participate at EiP:</b> Not specified	Incineration is the worst choice in terms of climate change.	<b>No changes proposed.</b> The Waste Core Strategy is not technology specific. In line with the vision and WO3 it seeks to promote the management of waste at the highest appropriate level of the waste hierarchy. This will be implemented in particular through policies WCS1, WCS2, WCS3 and WCS14.
<b>1649/29 i</b> Mrs E Jones	<b>Part:</b> 2.25 <b>Legally compliant:</b> Not specified <b>Sound:</b> Not specified <b>Wish to participate at EiP:</b> Not specified	You state that processes and waste treatment methods may change over the next 16 years. Therefore more modular processes should be in place to allow for flexibility.	<b>No changes proposed.</b> The Waste Core Strategy is not technology specific.
<b>1649/29 j</b> Mrs E Jones	<b>Part:</b> 2.44 <b>Legally compliant:</b> Not specified <b>Sound:</b> Not specified <b>Wish to participate at EiP:</b> Not specified	Waste is a resource. Therefore it should be treated as such. Lawrence's is an independent recycling company who have made great strides in recycling and more should and could be done in this respect.	<b>No changes proposed.</b> In line with the vision and objective WO3, the Waste Core Strategy seeks to promote the management of waste at the highest appropriate level of the waste hierarchy. This will be implemented in particular through policies WCS1, WCS2, WCS3 and WCS14.



Respondent	Representation	Verbatim comment	Action
<b>1649/29 k</b> Mrs E Jones	<b>Part:</b> 2.55 <b>Legally compliant:</b> Not specified <b>Sound:</b> Not specified <b>Wish to participate at EiP:</b> Not specified	I agree that the distance moved by road must be minimised. One large facility with movements of many miles, also movement of vehicles transferring residues for treatment and landfill add to these creating even more co2 emissions.	<b>No changes proposed.</b> Noted. The Publication Document does not specify preference for either large centralised or smaller local facilities.
<b>1649/29 l</b> Mrs E Jones	<b>Part:</b> 3.13 <b>Legally compliant:</b> Not specified <b>Sound:</b> Not specified <b>Wish to participate at EiP:</b> Not specified	Proof positive should be shown, not possibilities.	<b>No changes proposed.</b> Paragraph 3.13 provides further information to support policy WCS 2, which requires it to be <b>demonstrated</b> that energy recovery is optimised.
<b>1649/29 m</b> Mrs E Jones	<b>Part:</b> 3.15 <b>Legally compliant:</b> Not specified <b>Sound:</b> Not specified <b>Wish to participate at EiP:</b> Not specified	Ash residues create further need for landfill. In excess of 21,000 tpa of bottom ash is already being imported from out of county to be landfilled.	<b>No changes proposed.</b> Policy WCS2 part a iii and paragraph 3.15 require any residues from 'other recovery' facilities to be satisfactorily managed and disposed of.

Respondent	Representation	Verbatim comment	Action
<b>1649/29 n</b> Mrs E Jones	<b>Part:</b> 4.1 <b>Legally compliant:</b> Not specified <b>Sound:</b> Not specified <b>Wish to participate at EiP:</b> Not specified	You state that when directed to the right locations they provide economic opportunities without have adverse impacts on their surroundings. Incineration is recognised as having the most adverse impact on its surroundings and cannot provide economic opportunities. Also there is no justification for Hartlebury to be the chosen site other than the fact that the council had bought the site.	<b>No changes proposed.</b> The Waste Core Strategy is not technology or site specific. In line with the vision and WO3 it seeks to promote the management of waste at the highest appropriate level of the waste hierarchy. This will be implemented in particular through policies WCS1, WCS2, WCS3 and WCS14. Potential impacts on surroundings are considered through policies WCS4, WCS5, WCS6, WCS7, WCS8, WCS9, WCS10, WCS11, WCS12 and WCS13. See response to 1665/7 in relation to the current application for an Energy from Waste facility at Hartlebury Trading Estate.
<b>1649/29 o</b> Mrs E Jones	<b>Part:</b> 5.8 <b>Legally compliant:</b> Not specified <b>Sound:</b> Not specified <b>Wish to participate at EiP:</b> Not specified	The neighbouring fragile heathland at Hartlebury Common must be protected from any impact from incinerator emissions. The nitrogen deposit from incineration and increased traffic is bad for heathland.	<b>Change proposed</b> Environmental assets are protected by policy WCS7. <b>Proposed change</b> for consistency with policy WCS 11: Amenity Policy WCS7 <i>"Proposals for waste management facilities:</i> <i>"c) will <u>not</u> be permitted where they will have a likely significant effect on Internationally designated sites, or an unacceptable adverse impact on International, National and Local designated sites, habitats, species and heritage assets. An assessment of likely impacts <b>from the facility and any associated transport</b> on these features must take into account ..."</i>
<b>1649/29 p</b> Mrs E Jones	<b>Part:</b> 5.37 <b>Legally compliant:</b> Not specified	Mature oaks and trees with preservation orders must remain protected.	<b>No changes proposed.</b> Noted, landscaping and environmental concerns are considered through policies WCS7, WCS9 and WCS10. Tree preservation orders are regulated under different legislation which the Waste

Respondent	Representation	Verbatim comment	Action
	<b>Sound:</b> Not specified <b>Wish to participate at EiP:</b> Not specified		Core Strategy will not affect.
<b>1649/29 q</b> Mrs E Jones	<b>Part:</b> 8.38 <b>Legally compliant:</b> Not specified <b>Sound:</b> Not specified <b>Wish to participate at EiP:</b> Not specified	The Industrial Estates Study commissioned by the county council found that owners of trading or industrial estates are only concerned with profits providing that it is visually unobtrusive and in keeping with surrounding units. The proposal for an incinerator does not fulfil these criteria. It states that in the short term falling prices of such land would make selling land attractive to landowners in the current economic climate. A first class Trading Estate set within a very attractive area should not be allowed to be compromised for a possible short term gain.	<b>No changes proposed.</b> The Industrial Estates Study was commissioned to investigate the viability of delivering waste management facilities on the county's industrial estates. Its conclusions with regard to economic viability and property management company's views are intended to be informative in this light and do not constitute policy criteria.
<b>1649/29 r</b> Mrs E Jones	<b>Part:</b> General comment <b>Legally compliant:</b> Not specified <b>Sound:</b> Not specified <b>Wish to participate at EiP:</b> Not specified	There is no clear indication of how the City and Council would work together with one approach to carry out the emerging Waste Core Strategy. Also a lack of clarity regarding the contribution each authority will make to the recycling targets and waste arisings.	<b>No changes proposed.</b> 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. The City, Borough and District Councils work together with Worcestershire County Council and Herefordshire Council to deliver the Joint Municipal Waste Management Strategy. The JMWMS deals with how municipal waste should be managed. The Waste Core Strategy must set the policy framework by which all waste management facility

Respondent	Representation	Verbatim comment	Action
			<p>developments must be assessed, including those brought forward from the JMWMS.</p> <p>This means that the targets contained within the Waste Core Strategy will be contributed to through the implementation of the Joint Municipal Waste Management Strategy with regard to the municipal waste stream, and by the private sector with regard to the other waste streams, including commercial and industrial, construction and demolition, and hazardous wastes.</p>
<p><b>1649/29 s</b> Mrs E Jones</p>	<p><b>Part:</b> General comment <b>Legally compliant:</b> Not specified <b>Sound:</b> Not specified <b>Wish to participate at EiP:</b> Not specified</p>	<p>Defra have recently released its 2009 C&amp;I survey which shows an 18 per cent fall since 2002/3. The North West of England commercial and industrial waste survey dated March 2010 showed that up to 97.5 per cent of landfilled C&amp;I waste was potentially recyclable. The C&amp;I sector are becoming increasingly committed to driving waste management up the waste hierarchy. For example Food and Drink Federation members are now diverting 95 per cent of their packaging from landfill. This is having the effect of helping to extend the life of landfill sites.</p>	<p><b>No changes proposed.</b></p> <p>Noted. No capacity gap for landfill has been identified for the lifetime of the Waste Core Strategy. The waste figures used represent a worst-case scenario in order not to frustrate waste management development. The alternatives for establishing these figures are discussed in the background document "<i>Arising and capacity</i>", available on our website <a href="http://www.worcestershire.gov.uk/wcs">www.worcestershire.gov.uk/wcs</a>.</p>
<p><b>1649/29 t</b> Mrs E Jones</p>	<p><b>Part:</b> General comment <b>Legally compliant:</b> Not specified <b>Sound:</b> Not</p>	<p>Without a public enquiry – someone impartial with no potential conflict of interest, then it is unfair to the local community. It is even more unfair when County Council is in conflict with District Council.</p>	<p><b>No changes proposed.</b></p> <p>The Waste Core Strategy will be tested by a Planning Inspector at an Examination in Public. None of the City, Borough or District Councils have expressed concern that the Waste Core Strategy conflicts with their plans and strategies.</p>

Respondent	Representation	Verbatim comment	Action
	specified <b>Wish to participate at EiP:</b> Not specified		
<b>1649/29 u</b> Mrs E Jones	<b>Part:</b> General comment <b>Legally compliant:</b> Not specified <b>Sound:</b> No <b>Reason:</b> not justified, not effective <b>Wish to participate at EiP:</b> Not specified	I conclude that the whole strategy is unsound due to it being informed by the emerging preferred options report. To be justified it must be founded on a robust and credible evidence base and the most effective strategy when considered against alternatives. I believe that your department and its aims and objectives are to create the best methods of waste reduction for Worcestershire and its environment until 2027. Therefore incineration would not be the preferred technology within this strategy.	<b>No changes proposed.</b>  The Waste Core Strategy has been developed through consultation with local communities and stakeholders and reflects comments made in previous consultations (including the Emerging Preferred Options report).  Details of the evidence base and alternatives considered are set out in the background documents and have also been assessed through the SA.  The Waste Core Strategy aims to promote the management of waste at the highest appropriate level of the waste hierarchy. It is not technology specific.
<b>1653/30 a</b> Mr A Jones	<b>Part:</b> Not specified <b>Legally compliant:</b> Not specified <b>Sound:</b> Not specified <b>Wish to participate at EiP:</b> Yes	You will note that I have also enclosed a copy of my original letter dated 1st November 2010 to which I have not had a response, and since which Planning Permission by Worcestershire County Council has been granted, which I believe directly contravenes and undermines the intent of the Worcestershire Waste Core Strategy.  One point that I would wish to raise at this juncture is the fact that Worcestershire county Council appears to be directed by their waste contractor, Mercia Waste, and as such are being led	<b>No changes proposed.</b>  We note the inclusion of the letter dated 1 <sup>st</sup> November 2010. Correspondence was sent to Mr Jones on 12 <sup>th</sup> May 2011 drawing attention to the <i>Consultation Response Document</i> , which addressed the points raised in his letter of 1 <sup>st</sup> November 2010. For convenience the points raised and our responses to them were reproduced, as they were contained within the <i>Consultation Response Document</i> .  The Waste Core Strategy is not technology specific.  In line with the vision and WO3 it seeks to promote the management of waste at the highest appropriate level of the waste hierarchy. This will be implemented in particular through

Respondent	Representation	Verbatim comment	Action
		<p>to mass burn incineration as being the solution. There are less costly and less environmentally damaging options and further, these offer better energy from waste solutions. I would offer that other such solutions are not being considered because they are simply less profitable for the PFI contractor and not the taxpayer!</p> <p>On a positive note however, it is encouraging to note that a great many points within the Waste Core Strategy support the case against a mass burn incinerator (impact of unnecessary road miles, damage to Green Belt, adverse effect on local economy &amp; residents, production of greenhouse gases etc.) and if the Waste Core Strategy is implemented intelligently then such proposals would discount this as an option and focus on methods at the correct end of the Waste Hierarchy.</p> <p>I would very much appreciate your response to my original letter and would welcome any feedback to each of the points raised within my feedback forms.</p>	<p>policies WCS1, WCS2, WCS3 and WCS14.</p> <p>Any decision regarding the methods used for the management of Municipal Waste are separate from the Waste Core Strategy which is related to the planning issues. 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.</p> <p>The JMWMS deals with how municipal waste should be managed. The Waste Core Strategy must set the policy framework by which all waste management facility developments must be assessed, including those brought forward from the JMWMS. Any application for planning permission will be determined on its merits, judged on the basis of the Development Plan, of which the Waste Core Strategy will form part.</p> <p>See response to 1665/7 in relation to the current application for an Energy from Waste facility at Hartlebury Trading Estate.</p>
<p><b>1653/30 b</b></p> <p>Mr A Jones</p>	<p><b>Part:</b> 1.5</p> <p><b>Legally compliant:</b> Not specified</p> <p><b>Sound:</b> No</p>	<p>Creating a policy that has a 15yr life is potentially unsuitable as future changes in Government, with associated strategies and emerging technologies (such as anaerobic digestion). The life of the WCS should be reduced to be more</p>	<p><b>No changes proposed.</b></p> <p>As part of PPS12, Local Spatial Planning, it is national policy that Core Strategies should cover a period of at least 15 years. This is because "Core strategies represent a considerable body of work and are intended to endure and give a degree of certainty to communities and investors. In particular they give a</p>

Respondent	Representation	Verbatim comment	Action
	<b>Reason:</b> not effective <b>Wish to participate at EiP:</b> Yes	flexible.	<p>guide to where long term investment in infrastructure should be made" (PPS12, page 9-10). The Waste Core Strategy is not technology specific and therefore will be flexible to consider emerging technologies over this period.</p> <p>The strategy will be reviewed should this be necessary following monitoring of the strategy in the Annual Monitoring Reports (AMR) or following changes in national policy.</p>
<b>1653/30 c</b> Mr A Jones	<b>Part:</b> 2.22 <b>Legally compliant:</b> Not specified <b>Sound:</b> Yes <b>Wish to participate at EiP:</b> Yes	The text should be amended to include other contributing factors to the causes of greenhouse gases associated with waste management. A Mass Burn Incinerator, for example, would cause thousands of tonnes of CO2. Further explanation needs to be included of how reusing and recycling waste will recover energy and whether such processes cause CO2.	<p><b>No changes proposed.</b></p> <p>The relationship between waste management and climate change, including greenhouse gases, has been considered in more detail in the background document "<i>Climate change and waste management in Worcestershire</i>". Paragraph 2.22 in the Publication Document summarises some of the findings of that document and highlights the balance that waste management contributes to between greenhouse gas production, reduction and energy or resource benefits.</p> <p>As the Waste Core Strategy is not technology specific, it is not considered appropriate to include any more detailed reference in this paragraph. In line with the vision and WO3 it seeks to promote the management of waste at the highest appropriate level of the waste hierarchy. This will be implemented in particular through policies WCS1, WCS2, WCS3 and WCS14.</p>
<b>1653/30 d</b> Mr A Jones	<b>Part:</b> 2.31 <b>Legally compliant:</b> Not specified <b>Sound:</b> No <b>Reason:</b> not effective	This paragraph makes mention of a joint agreement with Herefordshire but the content of the whole report is totally biased toward Worcestershire, (for example fig. 13 on page 28 geographic hierarchy in Worcestershire areas alone). Surely, if there is a joint agreement then ALL figures and mapping have to relate to the two counties. For example	<p><b>No changes proposed.</b></p> <p>The Waste Core Strategy is a document which relates to the County Planning Authority area of Worcestershire. Planning policies for Herefordshire are contained within the Herefordshire Unitary Development Plan.</p> <p>The councils in Worcestershire and Herefordshire work together to deliver the Joint Municipal Waste Management Strategy. The JMWMS deals with how municipal solid waste (MSW) from</p>

Respondent	Representation	Verbatim comment	Action
	<b>Wish to participate at EiP:</b> Yes	transporting waste from South Herefordshire to North Worcestershire would be incredulous and would add to CO2 emissions	the two counties should be managed.  The Waste Core Strategy must set the policy framework by which proposals for waste management facility development in Worcestershire for all waste streams must be assessed.  For this reason, the Waste Core Strategy takes into account both Herefordshire's MSW arisings and management capacity but does not set out policies relating to Herefordshire or include Herefordshire in the maps or geographic hierarchy.
<b>1653/30 e</b> Mr A Jones	<b>Part:</b> 2.31 <b>Legally compliant:</b> No <b>Sound:</b> No <b>Reason:</b> not justified, not effective, not consistent <b>Wish to participate at EiP:</b> Yes	Worcestershire County Council's plan to build a Mass Burn Incinerator is potential infringement of EU Procurement LAW. Such a contract would constitute a material amendment to the essential conditions and would therefore be unlawful. I refer to the Head of the European Commissions Directorate Internal Market and Services Public Procurement Policy Unit who halted a contract with Hull and East Riding's Councils (in this case the amendment related to a 5yr extension and £72m addition - In the Worcestershire Incinerator case this is 13yrs and £500m!!).	<b>No changes proposed.</b>  The Waste Core Strategy is not technology specific.  Any decision regarding the methods used for the management of Municipal Waste are separate from the Waste Core Strategy which is related to the planning issues. 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.  The JMWMS deals with how municipal waste should be managed. The Waste Core Strategy must set the policy framework by which all waste management facility developments must be assessed, including those brought forward from the JMWMS. Any application for planning permission will be determined on its merits, judged on the basis of the Development Plan, of which the Waste Core Strategy will form part.  See response to 1665/7 in relation to the current application for an Energy from Waste facility at Hartlebury Trading Estate.



Respondent	Representation	Verbatim comment	Action
<b>1653/30 f</b> Mr A Jones	<b>Part:</b> 2.47 <b>Legally compliant:</b> Not specified <b>Sound:</b> No <b>Reason:</b> not effective <b>Wish to participate at EiP:</b> Yes	<p>Whilst I agree that some cross boundary movements are inevitable these should be minimised and a central location for the two counties should be sought for the waste arisings from the two counties. It will only be possible to do this when the WCS is updated to include Herefordshire.</p>	<p><b>No changes proposed.</b></p> <p>The Waste Core Strategy is a document which relates to the County Planning Authority area of Worcestershire. Planning policies for Herefordshire are contained within the Herefordshire Unitary Development Plan.</p> <p>Whilst the Waste Core Strategy takes into account both Herefordshire's MSW arisings and management capacity it is beyond the remit of the Waste Core Strategy to include Herefordshire in the policies, maps or geographic hierarchy.</p> <p>The Waste Core Strategy is not site specific and the policies can be used to assess proposals wherever they are brought forward.</p>
<b>1653/30 g</b> Mr A Jones	<b>Part:</b> 2.48 <b>Legally compliant:</b> Not specified <b>Sound:</b> No <b>Reason:</b> not justified, not effective <b>Wish to participate at EiP:</b> Yes	<p>The final paragraph within this point states that "the most significant volume of imports is MSW from Herefordshire". This underlines the fact the WCS needs to be updated to show the waste from both counties. The obvious conclusion is that if Herefordshire are exporting vast quantities of waste then this waste has to be dealt with within their own county (or at the very least, closer to Herefordshire and not within Hartlebury - the carbon footprint of moving this waste will cause undue traffic and damage the environment).</p>	<p><b>No changes proposed.</b></p> <p>See above (1635/30 f).</p> <p>See response to 1665/7 in relation to the current application for an Energy from Waste facility at Hartlebury Trading Estate.</p>
<b>1653/30 h</b> Mr A Jones	<b>Part:</b> 2.51 <b>Legally compliant:</b> Not	<p>In order to reduce the number of movements between the two counties, waste should be dealt with locally by using smaller localised facilities</p>	<p><b>No changes proposed.</b></p> <p>The Waste Core Strategy is concerned with all waste, including commercial and industrial waste, agricultural waste, construction and demolition waste, hazardous, clinical and</p>

Respondent	Representation	Verbatim comment	Action
	specified <b>Sound:</b> No <b>Wish to participate at EiP:</b> Yes	(proximity principle).	<p>radioactive waste and municipal solid waste. The Waste Core Strategy is not able to impose barriers to the movement of waste. It employs the concept of 'equivalent self-sufficiency' to take account of this, thereby enabling the provision of capacity which is sufficient to manage the quantities of waste produced in Worcestershire.</p> <p>Directing development to urban, centralised locations was supported in the <i>Refreshed Issues and Options</i> consultation. However in response to later consultations and in order to allow flexibility, the Publication Document does not specify preference for either large centralised or smaller local facilities. 65% of current waste management facilities in the county are smaller than 0.5 ha in size.</p> <p>The spatial strategy aims to direct development to those areas with the highest levels of arising, greatest resource demand, onward treatment facilities, connections to the strategic transport network and potential for future development of waste management facilities.</p>
<b>1653/30 i</b> Mr A Jones	<b>Part:</b> Table 12 <b>Legally compliant:</b> Not specified <b>Sound:</b> Not specified <b>Wish to participate at EiP:</b> Yes	If waste is to be managed at the highest appropriate level of the waste hierarchy then Worcestershire County Council's plan to build a Mass Burn Incinerator is fundamentally flawed. Incineration suppresses recycling (Wychavon Council recycle 47% of all waste, only 3% off the Governments 50% target for 2020 - the incinerator will reduce recycling to 41%). Mass Burn Incinerators, such as the one proposed, should not be called "Energy from Waste"; it is massively inefficient on electricity production and there is no market for heat recovery. The proposed	<p><b>No changes proposed.</b></p> <p>The Waste Core Strategy is not technology specific. In line with the vision and WO3 it seeks to promote the management of waste at the highest appropriate level of the waste hierarchy. This will be implemented in particular through policies WCS1, WCS2, WCS3 and WCS14.</p> <p>See response to 1665/7 in relation to the current application for an Energy from Waste facility at Hartlebury Trading Estate.</p>

Respondent	Representation	Verbatim comment	Action
		Incinerator cannot therefore fall into the "other recovery" category and damages recycling rates. The WCS should therefore dismiss it as an option.	
<b>1653/30 j</b> Mr A Jones	<b>Part:</b> 2.55 <b>Legally compliant:</b> Not specified <b>Sound:</b> No <b>Reason:</b> not justified, not effective <b>Wish to participate at EIP:</b> Yes	It is laudable to write that "They will be located... To serve the needs of local communities and economy and minimise the distance waste is moved by road". This paragraph highlights why Mass Burn Incineration is unthinkable; it will damage the local economy (a number of companies and food producers would look to relocate, thus removing more jobs than and incinerator would create) and locating it in the north of Worcestershire will cause tens of thousands of road miles each year. Waste has to be dealt with locally (proximity principle) to educate communities into causing less waste and any road miles travelled will be minimised.	<b>No changes proposed.</b> The Waste Core Strategy is not technology specific. See response to 1665/7 in relation to the current application for an Energy from Waste facility at Hartlebury Trading Estate.
<b>1653/30 k</b> Mr A Jones	<b>Part:</b> 2.56 <b>Legally compliant:</b> Not specified <b>Sound:</b> Not specified <b>Reason:</b> not justified, not effective	This paragraph states that distribution will be based on the geographic hierarchy but fails to include Herefordshire (in fact para 2.48 states that "the most significant volume of imports is MSW from Herefordshire). If Herefordshire's figures are included it is likely that waste will need to be dealt with on the border of the two counties, or more likely, a number of efficient smaller plants (such as anaerobic digesters) located in numerous	<b>No changes proposed.</b> The Waste Core Strategy is a document which relates to the County Planning Authority area of Worcestershire. Planning policies for Herefordshire are contained within the Herefordshire Unitary Development Plan. The Waste Core Strategy must set the policy framework by which proposals for waste management facility development in Worcestershire for all waste streams must be assessed. The councils in Worcestershire and Herefordshire work together to deliver the Joint Municipal Waste Management Strategy. The

Respondent	Representation	Verbatim comment	Action
	<b>Wish to participate at EiP:</b> Yes	locations.	JMWMS deals with how municipal solid waste (MSW) from the two counties should be managed.  The Waste Core Strategy takes into account both Herefordshire's MSW arisings and management capacity but does not include policies which cover Herefordshire and therefore does not include Herefordshire in the policies maps or geographic hierarchy.
<b>1653/30 l</b> Mr A Jones	<b>Part:</b> 3.3 and WCS2 <b>Legally compliant:</b> Not specified <b>Sound:</b> No <b>Reason:</b> not effective <b>Wish to participate at EiP:</b> Yes	Recovering resources from waste is common sense but what it not is burning recyclable materials (as would be the case with a Mass Burn Incinerator) as 85% of black bag waste could be recycled, if the District Councils operated a better segregated doorstep collection service across the two Counties). Further, the proposed location precludes the use of heat recovery (as there is no market).	<b>No changes proposed.</b>  Policy WCS2 requires proposals for 'other recovery' facilities to sort waste to optimise re-use and recycling. The Waste Core Strategy is not technology or site specific.  See response to 1665/7 in relation to the current application for an Energy from Waste facility at Hartlebury Trading Estate.
<b>1653/30 m</b> Mr A Jones	<b>Part:</b> 3.13 <b>Legally compliant:</b> Yes <b>Sound:</b> Yes <b>Wish to participate at EiP:</b> Yes	Energy recovery should be optimised and demonstrated. However this is not the case for the proposed Mass Burn Incinerator at Hartlebury which has no market for heat recovery and is inefficient with regard to electricity production. It also prevents emerging technologies being utilised for 25yrs.	<b>No changes proposed.</b>  Support for policy WCS2 noted.  See response to 1665/7 in relation to the current application for an Energy from Waste facility at Hartlebury Trading Estate.
<b>1653/30 n</b> Mr A Jones	<b>Part:</b> 3.15 <b>Legally</b>	Fly ash and bottom Ash does not have a realistic market. The HSE has recently investigated its use in construction	<b>No changes proposed.</b>  Noted. In accordance with Policy WCS2: Other recovery, The

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	<b>compliant:</b> Not specified <b>Sound:</b> No <b>Reason:</b> not justified, not effective <b>Wish to participate at EiP:</b> Yes	materials due to the material being unstable.	management or disposal of any residues will be for applicants to consider as part of their proposals.
<b>1653/30 o</b> Mr A Jones	<b>Part:</b> WCS6 <b>Legally compliant:</b> Not specified <b>Sound:</b> Yes <b>Wish to participate at EiP:</b> Yes	I agree that proposals should not have an adverse effect on safety or congestion on the transport network or amenity along transport routes. Why is Worcestershire County Council then proposing to build a Mass Burn Incinerator along a busy A road with a history of accidents?	<b>No changes proposed.</b> Support noted. See response to 1665/7 in relation to the current application for an Energy from Waste facility at Hartlebury Trading Estate.
<b>1653/30 p</b> Mr A Jones	<b>Part:</b> 5.1, 5.2, 5.3, 5.4 <b>Legally compliant:</b> Not specified <b>Sound:</b> Yes <b>Wish to participate at EiP:</b> Yes	All of these paragraphs are fundamental in bringing in waste management which does not destroy the environment or local economy. Why then is Worcestershire County Council proposing a Mass Burn Incinerator which will undermine each and every point made in these paragraphs? If the WCS has any worth then it should unequivocally state that Mass Burn Incineration is fundamentally flawed and should never be imposed on the people of Worcestershire, or any	<b>No changes proposed.</b> Support for these paragraphs noted. The Waste Core Strategy is not technology specific. Any decision regarding the methods used for the management of Municipal Waste are separate from the Waste Core Strategy which is related to the planning issues. 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. See response to 1665/7 in relation to the current application for

Respondent	Representation	Verbatim comment	Action
		other area.	an Energy from Waste facility at Hartlebury Trading Estate.
1653/30 q Mr A Jones	Part: 5.59 <b>Legally compliant:</b> Not specified <b>Sound:</b> Yes <b>Wish to participate at EiP:</b> Yes	Community views are important so how is it possible that the proposal to build a Mass Burn Incinerator can be even considered when the greater majority of local people are against it? Please do not claim that the "community are involved" then ignore them! The poll carried out by your waste contractor is a farce and thousands of letters and petitions have been written which prove that the people of Worcestershire do not want money wasted or their environment destroyed.	<b>No changes proposed.</b>  The Waste Core Strategy has been subject to formal consultation at 3 previous stages and reports have been prepared at each stage outlining how consultation comments have been taken into account. Positive feedback has also been received from respondents that feel their views have shaped the development of the Waste Core Strategy. Details of how responses have been taken into account at each stage are available on our website <a href="http://www.worcestershire.gov.uk/wcs">www.worcestershire.gov.uk/wcs</a> .  See response to 1665/7 in relation to the current application for an Energy from Waste facility at Hartlebury Trading Estate.
1653/30 r Mr A Jones	Part: WCS 2 a+b <b>Legally compliant:</b> Not specified <b>Sound:</b> Yes <b>Wish to participate at EiP:</b> Yes	a) I agree that energy recovery is optimised in waste management. How is it then that the proposal to build a Mass Burn Incinerator is even receiving consideration? - the electricity produced will be minimal and there is no viable use for the heat (note that the R1 calculations are flawed without heat recovery).  b) Note that a stack height of 80m breaks the restrictive covenant for the proposed site and will open Worcestershire County Council to legal costs and embarrassment.	<b>No changes proposed.</b>  a) The Waste Core Strategy is not technology specific.  See response to 1665/7 in relation to the current application for an Energy from Waste facility at Hartlebury Trading Estate.  b) A stack height of 80 metres was used in the Habitats Regulations Assessment (HRA) modelling process to determine likely significant effects on Natura 2000 sites, see paragraph 3.19. The HRA is available on our website <a href="http://www.worcestershire.gov.uk/wcs">www.worcestershire.gov.uk/wcs</a> .
1653/30 s	Part: WCS4	It is sound policy to only site "other	<b>No changes proposed.</b>

Respondent	Representation	Verbatim comment	Action
Mr A Jones	<b>Legally compliant:</b> Not specified <b>Sound:</b> Yes <b>Wish to participate at EiP:</b> Yes	recovery" on industrial land. I would however draw your attention to the fact that the proposed site at Hartlebury is a trading Estate and NOT industrial land.	Policy WCS 4: compatible land identifies <i>Industrial land, Contaminated or derelict employment land</i> and <i>Sites with current use rights for waste management purposes</i>  The term industrial land is used in its common English meaning, as an area where industrial and similar operations are carried out.  See response to 1665/7 in relation to the current application for an Energy from Waste facility at Hartlebury Trading Estate.
<b>1653/30 t</b> Mr A Jones	<b>Part:</b> WCS7 and photo on page 47 <b>Legally compliant:</b> Not specified <b>Sound:</b> Yes <b>Wish to participate at EiP:</b> Yes	Environmental assets should be protected. In fact it is good to see that on page 47 Hartlebury Common is identified as one of these assets. Is it not farcical therefore for Worcestershire County Council to propose the siting of a Mass Burn Incinerator only 1 mile away from this asset?	<b>No changes proposed.</b>  Support noted.  See response to 1665/7 in relation to the current application for an Energy from Waste facility at Hartlebury Trading Estate.
<b>1653/30 u</b> Mr A Jones	<b>Part:</b> WCS10 <b>Legally compliant:</b> Yes <b>Sound:</b> Yes <b>Wish to participate at EiP:</b> Yes	This policy stated that waste facilities will "take account of... built environment... scale" and "do not constitute inappropriate development in areas designated as Green Belt. Again, I site the case of Worcestershire County Council proposing a Mass Burn Incinerator, of considerable scale in Green Belt. This is obviously in direct conflict with your Policy and highlights why you should not allow Worcestershire County Council to proceed with this ridiculous plan. There are clearly no	<b>No changes proposed.</b>  See response to 1665/7 in relation to the current application for an Energy from Waste facility at Hartlebury Trading Estate.

Respondent	Representation	Verbatim comment	Action
		"special circumstances" as these have not been proven during the application stage - justification CANNOT be "there is nowhere else to put it"!	
<b>1653/30 v</b> Mr A Jones	<b>Part:</b> WCS11 <b>Legally compliant:</b> Not specified <b>Sound:</b> Yes <b>Wish to participate at EiP:</b> Yes	I agree with this policy with regard to Amenity but must again point out Worcestershire County Council's blatant disregard. For example Mercia Waste were unable to satisfactorily answer the councillors question with regard to noise and vibration during the Planning Meeting. There will also be issues of visual intrusion and light pollution to nearby residential areas.	<b>No changes proposed.</b> Support noted. See response to 1665/7 in relation to the current application for an Energy from Waste facility at Hartlebury Trading Estate.
<b>1653/30 w</b> Mr A Jones	<b>Part:</b> WCS12 <b>Legally compliant:</b> Not specified <b>Sound:</b> Yes <b>Wish to participate at EiP:</b> Yes	Whilst the Policy is sound I question how the proposal to build a Mass Burn Incinerator will benefit the local economy or the green economy. The clear MAJORITY of the local economy are totally against the proposal - evidenced by the thousands of names on petitions and thousands of letters; there is a real threat of a reduction in employment as current and potential employers will be dissuaded from locating in the area and; thousands of tonnes of CO2 will be created.	<b>No changes proposed.</b> Support for policy WCS12 noted. See response to 1665/7 in relation to the current application for an Energy from Waste facility at Hartlebury Trading Estate.
<b>1717/34 b</b> Mr D Holdstock Entec UK Ltd on	<b>Part:</b> General comments <b>Legally compliant:</b> Not	I can confirm that National Grid has no specific comments on the consultation document. I would however be grateful if you could clarify whether the County	<b>No changes proposed.</b> Representation <b>1717/34 a</b> contained general information about National Grid and their general planning concerns but no specific reference to the Waste Core Strategy Publication



Respondent	Representation	Verbatim comment	Action
behalf of National Grid	specified <b>Sound:</b> Not specified <b>Wish to participate at EiP:</b> Not specified	Council are intending to produce a site specific document which allocates waste sites?	Document (Regulation 27). Mr Holdstock was contacted to clarify National Grid's position and representation <b>1717/34 b</b> was received in response.  <i>We informed Mr Holdstock that "we don't intend to produce a site specific DPD, but the Inspector could of course direct us to. If that happens, you are on our consultation list and will be consulted throughout."</i>
<b>740/35</b> Mr M Watt Cotswold Conservation Board	<b>Part:</b> Not specified <b>Legally compliant:</b> Yes <b>Sound:</b> Not specified <b>Wish to participate at EiP:</b> Not specified	No comments.	<b>No changes proposed.</b>
<b>800/36</b> Mr T Richards Herefordshire and Worcestershire Earth Heritage Trust	<b>Part:</b> Not specified <b>Legally compliant:</b> Yes <b>Sound:</b> Not specified <b>Wish to participate at EiP:</b> Yes	No comments.	<b>No changes proposed.</b>
<b>1656/37</b> Mrs P Rogers	<b>Part:</b> Not specified <b>Legally</b>	I have not the aptitude or time to winkle out tiny details of paragraphs etc, this is designed to put people off! I believe that	<b>No changes proposed.</b>  The Publication Document (Regulation 27) is written as the final version of the Waste Core Strategy which we intend to submit to

Respondent	Representation	Verbatim comment	Action
	<b>compliant:</b> No <b>Sound:</b> No <b>Reason:</b> not justified, not effective, not consistent <b>Wish to participate at EiP:</b> Not specified	<p>the policy incorporates incineration, this is out-dated technology which is a disincentive to reduction of waste and recycling as the plant requires plenty of waste to make lots of money for the owners. There is no current agreed use of heat generated by incineration or use for the ash, I believe the ash from Dudley currently goes into landfill at Hartlebury! Incineration is not a 'green' option and Worcs County Council should be ashamed to be considering it. The cost will weigh so heavy around the necks of the voters for years to come, Worcs CC are considering all sorts of measures to save money, such as stopping free school transport, which the council itself has tried so hard to provide. Why oh why go ahead with this dinosaur to the detriment of us all?</p>	<p>the Secretary of State for examination. Subject to any changes recommended by the Planning Inspector following this consultation and the Examination in Public, this is the document which will become the adopted Development Plan Document and form part of the Development Plan for Worcestershire, and therefore needs to be fit for purpose to provide planning policy for both decision makers and developers to utilise. This statutory consultation focuses on issues of soundness and legal compliance of the document, therefore it was not appropriate to produce a summary version. The response form was designed to focus comments on the issues of soundness and legal compliance.</p> <p>The Waste Core Strategy is not technology or site specific. In line with the vision and WO3 it seeks to promote the management of waste at the highest appropriate level of the waste hierarchy. This will be implemented in particular through policies WCS1, WCS2, WCS3 and WCS14.</p> <p>See response to 1665/7 in relation to the current application for an Energy from Waste facility at Hartlebury Trading Estate.</p>
<b>1682/38</b> Mr N Winter	<b>Part:</b> Not specified <b>Legally compliant:</b> Yes <b>Sound:</b> Yes <b>Wish to participate at EiP:</b> Not specified	No comment.	<b>No changes proposed.</b> Support noted.
<b>547/39</b> Mr D Thomas	<b>Part:</b> EfW at Hartlebury (Pg 79)	Chaddesley Corbett Parish Council supports the campaign against the proposals to build an Energy from Waste	<b>No changes proposed.</b> The Waste Core Strategy is not technology or site specific.

Respondent	Representation	Verbatim comment	Action
Chaddesley Corbett Parish Council	<b>Legally compliant:</b> Yes <b>Sound:</b> No <b>Reason:</b> not justified <b>Wish to participate at EiP:</b> Not specified	facility at Hartlebury. The existing development of the site does not justify such a development in a Green Belt location, and the site is not well located for high volumes of road traffic. If such a facility is required then it should, arguably, be located closer to the County's largest centres of population (i.e. Worcester/Redditch).	<p>Page 79 does not make reference to Energy from Waste at Hartlebury.</p> <p>In line with the vision and WO3 it seeks to promote the management of waste at the highest appropriate level of the waste hierarchy. This will be implemented in particular through policies WCS1, WCS2, WCS3 and WCS14. The spatial strategy is to direct development to those areas with the highest levels of arising, greatest resource demand, onward treatment facilities, connections to the strategic transport network and potential for future development of waste management facilities.</p> <p>See response to 1665/7 in relation to the current application for an Energy from Waste facility at Hartlebury Trading Estate.</p>
<b>716/40 a</b> Ms A Smith English Heritage	<b>Part:</b> The objectives, page 32 <b>Legally compliant:</b> Not specified <b>Sound:</b> Yes <b>Wish to participate at EiP:</b> Not specified	English Heritage welcomes and supports the broad intentions of Objective WO2 and its explicit recognition of protecting and enhancing the County's environmental and cultural assets and the character and amenity of the local area. This flows from and supports the vision as expressed at 2.54 and its environmental aspirations.	<b>No changes proposed.</b> Support noted.
<b>716/40 b</b> Ms A Smith English Heritage	<b>Part:</b> WCS7 <b>Legally compliant:</b> Not specified <b>Sound:</b> Yes <b>Wish to participate at</b>	English Heritage supports the general aims of Policy WCS7 Environmental Assets and in particular is specific consideration of heritage assets under parts (a) and [c] (iv). The development of the policy and explanatory text (5.11) have positively taken account of previous representations submitted by English	<b>No changes proposed.</b> Support noted.

Respondent	Representation	Verbatim comment	Action
	<b>EiP:</b> Not specified	Heritage during earlier consultation stages, which we welcome and support. We fully support the clear references at paragraph 5.11 to the use of locally derived evidence base on the historic environment to inform proposals.	
<b>716/40 c</b> Ms A Smith English Heritage	<b>Part:</b> WCS10 <b>Legally compliant:</b> Not specified <b>Sound:</b> Yes <b>Wish to participate at EiP:</b> Not specified	English Heritage supports the general content and intentions of Policy WCS10 Local Characteristics. In particular we welcome and support the clear referencing in the policy to the County's landscape character assessment and historic landscape characterisation (part a) in conjunction with the explanatory text and its consideration of both the character of the built environment (5.39-40) and landscape character (5.41).	<b>No changes proposed.</b> Support noted.
<b>1444/42</b> Mr P Morgan	<b>Part:</b> Not specified <b>Legally compliant:</b> No <b>Sound:</b> No <b>Reason:</b> not justified, not effective, not consistent <b>Wish to participate at EiP:</b> Not specified	<i>(Not sound)</i> It is not based on sound environmental and economic principles. Carting waste around the county and burning it is not economical or environmentally sound and not compliant with EEC principles and guidance.	<b>No changes proposed.</b>  The Waste Core Strategy objectives and policies take economic and environmental principles into account. In line with the vision, the strategy seeks to promote the management of waste at the highest appropriate level of the waste hierarchy and minimise the distance waste is moved by road.  The waste hierarchy will be implemented in particular through objective WO3 and policies WCS1, WCS2, WCS3 and WCS14, and in the location of waste management facilities to minimise distances will be implemented in particular through objectives WO4 and WO8 and policies WCS1, WCS2, WCS3, WCS5, and WCS6.

Respondent	Representation	Verbatim comment	Action
		<i>(Not legally compliant)</i> EEC Regulations recording best practises.	The council believes that the strategy is compliant with national and European legislation and policy. One of the purposes of the Examination is to test this. Recourse is also possible to the courts to assess its legality and conformity to national and EU policy.
<b>680/43 a</b> Mr M Dunphy Bromsgrove District Council	<b>Part:</b> 2.43 <b>Legally compliant:</b> Yes <b>Sound:</b> Yes <b>Wish to participate at EiP:</b> Not specified	Paragraph 2.43 states that Bromsgrove will need much higher waste water treatment capacity to meet the demands of planned expansion? In relation to this, Bromsgrove District Council will continue to work with Worcestershire County Council, as well as relevant developers/third parties, on all elements of infrastructure provision to support new and existing developments	<b>No changes proposed.</b> Support noted.
<b>680/43 b</b> Mr M Dunphy Bromsgrove District Council	<b>Part:</b> Annex A <b>Legally compliant:</b> Yes <b>Sound:</b> Yes <b>Wish to participate at EiP:</b> Not specified	In terms of the Areas of Search that have been identified within Annex A as being potentially suitable for waste management facilities in the Bromsgrove Zone; the Council have concerns about using prime business park sites for waste management facilities, and would look to ensure that any development that takes place in these locations is in accordance with the Council's emerging Core Strategy, complementary to other businesses, and maximises employment potential.	<b>No changes proposed.</b> Noted. All proposals will be determined in accordance with the development plan, which will include the Waste Core Strategy and City, Borough and District Councils' Development Plan Documents and Local Plans.  It is expected that many modern waste management facilities will be in keeping with other industrial or business uses. We will continue to consult the City, Borough and District Councils about applications within their areas.
<b>688/44</b> Mr I Pumfrey	<b>Part:</b> Not specified	No comments.	<b>No changes proposed.</b> Support noted.

Respondent	Representation	Verbatim comment	Action
Malvern Hills District Council	<b>Legally compliant:</b> Yes <b>Sound:</b> Yes <b>Wish to participate at EiP:</b> Not specified		
<b>1733/45 a</b> Ms R Clare Environment Agency	<b>Part:</b> General comments <b>Legally compliant:</b> Not specified <b>Sound:</b> Yes <b>Wish to participate at EiP:</b> Yes	<p>Thank you for consulting us on the Worcestershire Waste Core Strategy Publication Document. We previously commented on the draft submission document in our letter dated 09 November 2010, our reference SV/2010/103980/CS-03/SB1. In that letter we raised some concerns on the flood risk evidence base, cross-boundary treatment of waste, hazardous waste and landfill policy. We consider that the publication document (along with our discussions and liaison since our previous response) has adequately addressed our previous concerns. We are now in a position to support the document. We also note the changes you have made to the document, in particular the new policies, and we are generally supportive of these. We have made a recommendation for an addition in policy WCS 3: Landfill and disposal if this is possible at this stage, although we do not raise this as a soundness issue.</p> <p>Our comments on the document and how it has address our previous comments is</p>	<b>No changes proposed.</b> Support noted.

Respondent	Representation	Verbatim comment	Action
		set out below:	
<b>1733/45 b</b> Ms R Clare Environment Agency	<b>Part:</b> The Vision <b>Legally compliant:</b> Not specified <b>Sound:</b> Yes <b>Wish to participate at EiP:</b> Yes	<p>We previously commented on the vision and the need to include prevention of waste and a stronger emphasises on the waste hierarchy. We welcome the alterations you have made to the vision, and we feel the reference to homes and businesses producing less waste gives the vision a 'prevention' angle. The tie to the waste hierarchy is also stronger and we welcome the continued inclusion and importance of climate change, particularly the reference to a green and low carbon economy, mitigation and resilience. We also feel that the vision strikes a good balance between local and national issues, with a strong local flavour to it whilst recognising the importance of national issue and how these affect the local area. We therefore welcome and support the vision.</p> <p>We also feel that the waste hierarchy permeates the document as a whole more thoroughly than before, and welcome this.</p>	<b>No changes proposed.</b> Support noted
<b>1733/45 c</b> Ms R Clare Environment Agency	<b>Part:</b> Flood risk <b>Legally compliant:</b> Not specified <b>Sound:</b> Yes <b>Wish to</b>	<p>In our previous response we raised concern about the evidence base and flood risk, as not all Strategic Flood Risk Assessments (SFRAs) for the County had been completed at that point. As you are aware we have had liaison about the matter since then and following the</p>	<b>Changes proposed.</b> <p>The Environment Agency was contacted to confirm that they are satisfied with the following proposed changes (see <i>Appendix 7: Correspondence with Environment Agency</i>). Reply not yet received.</p> <b>Proposed change</b> , insert new paragraph after 5.13:

Respondent	Representation	Verbatim comment	Action
	participate at EIP: Yes	<p>various clarifications and discussions we are now in a position to support the approach to flood risk and the evidence base. (This is as per our letter to you dated 09 February 2011, our reference SV/2010/103980/SF-03/P01-L01 and my further email to you dated 23 March 2011.)</p> <p>We note the changes you have made to the supporting text in paragraphs 5.12 to 5.16. In our previous response we recommended various suggestions for enhancement of the supporting text. Whilst we welcome the attempt to accommodate our recommendations we do not feel that the new paragraphs have covered our previous suggestions in full. However we recognise that it is important to keep the document succinct and we consider that the main points have been covered. Therefore whilst the wording is not as comprehensive as we would like to see, we do not feel this is a soundness issue and would not therefore wish to raise a soundness objection on this matter. It should be noted that we consider the evidence base and policies within the document have covered the issue of flood risk adequately (see comments below on policy WCS8), so the fact that the supporting text is not exactly as we would wish should not be viewed as an overall inadequacy of the document on flood risk as this is not the</p>	<p><i>"In order to remain safe and operational during flood events, waste management facilities should be designed to ensure that materials are stored in a way that would not result in pollution on-site during flooding, and would not allow materials to be washed away and result in pollution problems elsewhere. Safe access for vehicles and pedestrians to the development in the event of flooding should also be considered."</i></p> <p><b>Proposed change</b> to paragraph 5.14:</p> <p><i>"New development can avoid increasing flood risk on the site and elsewhere by incorporating sustainable drainage systems (SuDS)<sup>75</sup>, such as green roofs and permeable car parks, that can cope with high levels of rainfall and improve attenuation of run-off and do not result in either deterioration in water quality or pollution being discharged into local watercourses. There should be no net reduction in flood storage areas and development should not impede flood flow routes."</i></p>



Respondent	Representation	Verbatim comment	Action
		case.	
<b>1733/45 d</b> Ms R Clare Environment Agency	<b>Part:</b> Policies: WCS3, WCS6, WCS7, WCS8, WCS9 <b>Legally compliant:</b> Not specified <b>Sound:</b> Yes <b>Wish to participate at EiP:</b> Yes	<p>We note the changes that have been made to the policies since the previous draft of the document. We feel that by separating out some of the issues and having more policies than previously this adds to the clarity and quality of the policies. We are therefore generally supportive of the new policies. We have the following comments on some specific policies:</p> <p><b>WCS 3: Landfill and disposal</b></p> <p>In our previous response we commented on whether this policy was needed. We note the commentary in the consultation response document:</p> <p><i>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.</i></p> <p>We accept therefore that you have chosen to include the policy still. We note that the criteria for whether landfills will be permitted still refer to various options rather than being a combination of all options (the use of the word “or” rather than “and”). We recognise that you consider this to be necessary to assess proposals if they are brought forward therefore we do not pursue this</p>	<p><b>Changes proposed.</b></p> <p>Change suggested to Policy WCS3 part b) ii).</p> <p>The Environment Agency was contacted to confirm that they are satisfied with the following proposed changes (see <i>Appendix 7: Correspondence with Environment Agency</i>). Reply not yet received.</p> <p>The wording used in WCS6 in the <i>First Draft Submission</i> consultation for protection and enhancement of the local environment in landfill restoration schemes has not been carried through to the new policy WCS 3 as this concept is now covered through Policies WCS7, WCS9 and WCS10. However, for clarity, the following changes are proposed:</p> <p><b>Proposed change</b> to Policy WCS3 part b)ii):</p> <p><i>"a restoration scheme <b>which contributes positively to the objectives of the development plan</b>, with details of aftercare for a minimum period of 5 years."</i></p> <p><b>Proposed change</b> to Paragraph 3.29</p> <p><i>"All proposals for new landfill capacity need to consider the whole life of the landfill site, from engineering through to restoration. The restoration of landfill sites can provide opportunities to create new or enhance existing habitats and provide valuable open space for communities or recreational facilities and should maximise the opportunities to do so. The restoration scheme should be developed taking into account the considerations in Policy WCS 7, <b>and the objectives of relevant city, borough, district, parish and neighbourhood</b></i></p>

Respondent	Representation	Verbatim comment	Action
		<p>argument.</p> <p>We note that the previous policy WCS6 contained wording for protection and enhancement of the local environment in the restoration scheme. This has not been carried through to the new policy WCS 3 and we recommend that this wording alteration is made to the policy if possible at this stage. We do not feel this would be a soundness issue as a document cannot be found 'more sound'. However we feel the alteration would make the policy more effective and therefore seek the alteration if at all possible at this stage.</p> <p><b>WCS6:Site Infrastructure and Access</b></p> <p>We previously commented on transportation issues in relation to the previous policies WCS1 and 2. We note the new policy WCS6 and welcome its approach to transport. This is in the interests of climate change mitigation and in accordance with the proximity principle and therefore we support this new policy. We also note the criteria for safe vehicular and pedestrian access and welcome this as it has a link to flood risk, which was one of our previous recommendations. We also consider that this policy goes some way to addressing our comments in our previous letter under the 'additional capacity</p>	<p><i>plans."</i></p> <p>This will ensure that restoration schemes are in accordance with the Waste Core Strategy, City, Borough and District Core Strategies and parish and neighbourhood plans. This would take into account the protection and enhancement of the local environment, but also allow some flexibility for other schemes which have recreation or other benefits.</p> <p><b>Change proposed.</b></p> <p>Support noted. Change to be made to refer to access in supporting text for policy WCS8 (see above).</p>

Respondent	Representation	Verbatim comment	Action
		<p>requirements' heading in relation to cross-county border matters (Herefordshire), and we do not feel it would be appropriate to raise this as a matter of soundness.</p> <p><b>WCS7: Environmental Assets</b></p> <p>We note this new policy and support it as it gives a strong biodiversity/ecological focus and picks up on the issue of cumulative impact.</p> <p><b>WCS8: Flood Risk and water resources</b></p> <p>We note this new policy and support it. We previously made recommendations on the flood risk aspects of the previous policy WCS2. Our suggestions were quite lengthy and did include an element of mirroring of PPS25. Therefore we recognise that it may not have been suitable to include these in their entirety. We consider the wording of the new policy WCS8 covers the important elements of floods risk and together with the supporting text in section 5 we consider this is adequate to cover the issue (as alluded to in the above flood risk section of this letter). In addition we feel the section in this policy on water resources is a good improvement on the previous version of the document. We therefore support this policy.</p>	<p><b>No changes proposed.</b></p> <p>Support noted.</p> <p><b>No changes proposed.</b></p> <p>Support noted.</p>

Respondent	Representation	Verbatim comment	Action
		<p><b>WCS9: Sustainable Design and Operation of facilities</b></p> <p>We note the new policy WCS9 which draws on some of the aspects of the previous policy WCS2. We strongly support this policy, particularly in relation to its references to climate change, water efficiency, energy efficiency, carbon sinks and the requirement for 10% of energy supply from on-site renewables.</p>	<p><b>No changes proposed.</b></p> <p>Support noted.</p>
<p><b>1733/45 e</b></p> <p>Ms R Clare Environment Agency</p>	<p><b>Part:</b> Hazardous waste</p> <p><b>Legally compliant:</b> Not specified</p> <p><b>Sound:</b> Yes</p> <p><b>Wish to participate at EiP:</b> Yes</p>	<p>In our previous letters we have commented on the issue of hazardous waste. Since our previous response we have liaised on this matter and you have address/clarified matters on this through your correspondence and the revised Hazardous Waste Background Paper. We therefore consider these matters have been addressed and do not consider this to be a soundness issue.</p>	<p><b>No changes proposed.</b></p> <p>Support noted.</p>
<p><b>1733/45 f</b></p> <p>Ms R Clare Environment Agency</p>	<p><b>Part:</b> Concluding comments</p> <p><b>Legally compliant:</b> Not specified</p> <p><b>Sound:</b> Yes</p> <p><b>Wish to participate at EiP:</b> Yes</p>	<p><b>Conclusion</b></p> <p>To conclude, we welcome the changes you have made in light of our previous comments and the efforts you have gone to to address and clarify the aspects we have raised previously. We are supportive of the document and its policies. In particular we welcome the document's treatment of climate change throughout and the improved references to the waste hierarchy. We welcome the</p>	<p><b>No changes proposed.</b></p> <p>Support noted.</p>

Respondent	Representation	Verbatim comment	Action
		<p>new policies. We have made a recommendation for policy WCS 3: Landfill and disposal if this is possible at this stage, although this is not raised as a soundness issue.</p> <p>We would like to attend the Examination in Public so as to represent the environmental matters within our remit should these be discussed at the Examination.</p>	
<b>704/46</b> E Neale Warwickshire County Council	<b>Part:</b> Not Specified <b>Legally compliant:</b> Not specified <b>Sound:</b> Not specified <b>Wish to participate at EiP:</b> Not specified	<p>I would like to thank you for providing Warwickshire County Council with the opportunity to make comments on the above consultation.</p> <p>At this stage we have no further comments to make, however I would appreciate it if you could continue to keep us informed of any progress and wish you all the best with your Waste Core Strategy.</p>	<b>No changes proposed.</b>
<b>707/47</b> D Harris Walsall Council on behalf of Black Country Authorities	<b>Part:</b> Not specified <b>Legally compliant:</b> Yes <b>Sound:</b> Yes <b>Wish to participate at EiP:</b> Not specified	<p>Officers in the Black Country Authorities (Dudley MBC, Sandwell MBC, Walsall Council and Wolverhampton City Council) have reviewed the Publication document, and have not identified any issues of concern with regard to "soundness." The Publication document also appears to be compliant with current national policy guidance and the Waste Framework Directive (WFD).</p>	<b>No changes proposed.</b> Support noted.

Respondent	Representation	Verbatim comment	Action
		From the information available, the Core Strategy appears to have no significant impact on the management of waste arising from the Black Country. As you may be aware, some residual municipal waste from Dudley is currently being sent to the Veolia and Biffa landfill sites at Bromsgrove and Hartlebury respectively. We have not identified anything explicit in the Publication document or in the supporting documents to prevent this from continuing. However, Dudley MBC would object to any proposals that would affect its existing contractual arrangements.	
<b>681/48 a</b> Mr J Brain Malvern Hills District Council	<b>Part:</b> Not specified <b>Legally compliant:</b> Yes <b>Sound:</b> Yes <b>Wish to participate at EiP:</b> Not specified	Please accept this response as qualified support of the Worcestershire Waste Core Strategy – “Test of Soundness”. This response supplements Malvern Hills District Council’s formal response to the Draft Waste Core Strategy submitted 8th November 2010. We welcome and encourage the need to work closely with neighbouring local planning authorities to help facilitate sustainable development and promote healthy and prosperous communities.  The representation is split into the three areas of soundness identified in your guidance notes, namely: justified, effective and consistent with national policy.	<b>No changes proposed.</b>  Support noted.

Respondent	Representation	Verbatim comment	Action
<b>681/48 b</b> Mr J Brain Malvern Hills District Council	<b>Part:</b> 2.21, 2.7, 2.8, 2.17, 2.22, 2.35, Table 7 <b>Legally compliant:</b> Yes <b>Sound:</b> Yes <b>Wish to participate at EiP:</b> Not specified	<p><b>JUSTIFIED</b></p> <p>Overall the document is considered to be founded on robust evidence however there are a number of facts stated throughout the document that require citation. For example Para 2.21 would benefit from referencing Worcestershire's total annual CO<sub>2</sub> emissions exact data source. Other facts that require referencing can be found in the following paragraphs 2.7, 2.8, 2.17, 2.22 and 2.35.</p> <p>Furthermore Table 7 Environmental Assets on page 46 should include the Area of Outstanding Natural Beauty (AONB) to the list of national designated sites. This is a significant national designation enshrined in the 1949 National Parks and Access to the Countryside Act and more recently this designation was further strengthened in the 2000 Countryside and Rights of Way Act.</p> <p>However notwithstanding these issues, it is considered that the Waste Core Strategy is founded on a robust and credible evidence base.</p>	<p><b>Change proposed.</b></p> <p>Malvern Hills District Council was contacted to confirm that they are satisfied with the following proposed changes (see Appendix 8: Correspondence with Malvern Hills District Council). Reply not yet received.</p> <p><b>Proposed change</b> to footnote 20 attached to paragraph 2.21:  <i>"<b>Information on Worcestershire's CO<sub>2</sub> emissions from Worcestershire Partnership Climate Change Strategy (2005-2011).</b> These figures exclude emissions from motorways"</i></p> <p><b>Proposed change</b> to paragraph 2.7:  <i>"Land drainage and flooding issues are important influences on development in Worcestershire. Approximately 10% of the land area of Worcestershire is at risk of flooding <sup>NEW FOOTNOTE</sup>. Flooding affects every town in the county and can significantly affect where waste management development can take place. This will place more limitations on some types of facilities than others: waste water treatment could be suitable on the functional flood plain but other types of facilities would not."</i></p> <p>New footnote text: <i>"<b>Planning for Climate Change in Worcestershire Technical Research Paper Draft: May 2008</b>"</i></p> <p><b>Proposed change</b> to paragraph 2.8:  <i>"71% of the population of Worcestershire live in urban areas, principally Worcester, Redditch and Kidderminster, Stourport on Severn, Bromsgrove, Malvern, Droitwich Spa and Evesham, with over one sixth of the population living in Worcester <sup>NEW FOOTNOTE</sup>. Some smaller towns, notably Bewdley, Pershore, Upton-upon-Severn and Tenbury Wells provide a traditional market town role serving an extensive rural hinterland."</i></p>

Respondent	Representation	Verbatim comment	Action
			<p>New footnote text:</p> <p><i>"<a href="#">Worcestershire County Economic Assessment 2009-2010</a>"</i></p> <p><b>Proposed change</b> to paragraph 2.17:</p> <p><i>"The strategic rail network within Worcestershire has strong links to the north and south of the county. Worcester, Kidderminster, Redditch, Bromsgrove, Droitwich Spa, Malvern, Evesham and Pershore are all connected to the rail network. There is rail capacity for freight movement on most routes in Worcestershire although this is not available at peak times. There are, however, no major rail freight facilities located in the county. The development of new stations or railheads is likely to be challenging. Trainloads generally convey around 1000 tonnes payload meaning that even on a weekly train basis a terminal/waste transfer station would need to have throughput of 52,000 tonnes a year <sup>NEW FOOTNOTE</sup>. There is no evidence to suggest that such a terminal would be economically viable in Worcestershire at present. However the Waste Core Strategy will encourage potential for rail transport to be considered where appropriate."</i></p> <p>New footnote text: <i>"<a href="#">Information provided by Network Rail in response to the Waste Core Strategy First Draft Submission consultation (reference WR25-4 in the 'Consultation Response Document, December 2010')</a>"</i></p> <p><b>Proposed change</b> to paragraph 2.22:</p> <p><i>"The greenhouse gases that make the largest contribution to global warming are carbon dioxide, methane and nitrous oxide. All three can be produced during the management and disposal of wastes. In the UK waste management is estimated to contribute around 2.5% of total greenhouse gas emissions and</i></p>



Respondent	Representation	Verbatim comment	Action
			<p>41% of all methane emissions <sup>NEW FOOTNOTE (A)</sup>. Most of these emissions come from the landfill of biodegradable waste <sup>NEW FOOTNOTE (B)</sup>. Re-using and recycling waste can reduce the greenhouse gas emissions produced as waste decomposes. These activities can also result in a greenhouse gas reduction and energy benefit by recovering energy or recycling materials and reducing the need for virgin materials."</p> <p>New footnote A text: "<a href="#">Stern Review on the Economics of Climate Change s.i.: HM Treasury, 2006. See Waste Core Strategy background document 'Climate change and waste management in Worcestershire'</a>."</p> <p>New footnote B text: "<a href="#">Defra Waste Strategy for England 2007</a>"</p> <p><b>Proposed change</b> to paragraph 2.35:</p> <p>"In Worcestershire, most existing facilities are smaller than 0.5 ha in size (65% of facilities), with only 22% of facilities being over 1 ha in size. There are however some larger sites in the county, with the largest being approximately 13 ha <sup>NEW FOOTNOTE</sup>."</p> <p>New footnote text: "<a href="#">See Waste Core Strategy background document 'Waste sites in Worcestershire'</a>."</p> <p>Areas of Outstanding Natural Beauty (AONB) have not been included in Table 7 as they are considered separately in policy WCS 10. <b>Proposed change</b> to paragraph 5.5:</p> <p>"International, National and Local designated sites, habitats, species and heritage assets are listed in Table 7 <sup>NEW FOOTNOTE</sup>."</p> <p>New footnote text: "<a href="#">Areas of Outstanding Natural Beauty and Green Belt are considered in policy WCS 10 Local</a></p>

Respondent	Representation	Verbatim comment	Action
			<i>Characteristics".</i>
<b>681/48 c</b> Mr J Brain Malvern Hills District Council	<b>Part:</b> Chapter 8 <b>Legally compliant:</b> Yes <b>Sound:</b> Yes <b>Wish to participate at EiP:</b> Not specified	<b>EFFECTIVE</b> Based against background evidence papers and the subsequent assumptions found in table nine it is considered the Waste Core Strategy is deliverable. At the time of publication, several local planning authorities across Worcestershire have yet to locally determine future housing and employment provision. It will be vitally important to ensure that any future housing and employment growth is carefully monitored so as to ensure sufficient infrastructure capacity exists during the life of the Waste Core Strategy. It is argued that insufficient emphasis has been made in Chapter 8 as a possible impact to delivery. Notwithstanding these points, it is generally considered that the indicators, their targets and the policy review process are appropriate and flexible enough for the effective delivery of the Waste Core Strategy.	<b>Issues identified - action on going</b> Malvern Hills District Council was contacted to confirm that they are satisfied with the following proposed changes (see Appendix 8: Correspondence with Malvern Hills District Council). Reply not yet received.  <b>Proposed change</b> to paragraph 8.27:  <i>"8.27 The capacity gap and therefore the land requirements identified in</i> <b>Error! Reference source not found. Table 3</b> <i>nd</i> <b>Appendix 4</b> <i> are based on the following assumptions:</i> <ul style="list-style-type: none"> <li><b>•Estimates of projections based on the assumptions in Table 9.</b></li> </ul> <i>In practice however these projections are likely to be above actual levels of waste arisings. They are already higher than the figures for actual waste arisings for comparable years as set out in the Waste Data Interrogator (WDI). The WDI shows a 28% decrease in the amount of HCI waste managed in Worcestershire between 2007-2009 and a 21% decrease in waste managed in England over the same period.</i>  <i>The projections make no allowance for the possibility that fiscal and regulatory policies and national and local initiatives will themselves foster more efficient industrial practices and further reductions in waste production. In the short term at least the current economic downturn has already led to reduced output and it is possible that both will remain lower for some years to come.</i>

Respondent	Representation	Verbatim comment	Action
			<p><i>The projections of MSW, clinical waste and C&amp;D waste arisings are based on household growth targets set out in the proposed RSS phase two revision. However the proposed revision has not been adopted and the Secretary of State has expressed his intention to revoke the existing RSS. At the time of publication the only planning authority in Worcestershire with an adopted Core Strategy is Wyre Forest District Council and several local planning authorities across Worcestershire have yet to locally determine future housing and employment provision. This will need to be monitored and any impacts on the projections and the deliverability of the Waste Core Strategy will be considered in the Annual Monitoring Report.</i></p> <ul style="list-style-type: none"> <li>• <b>All existing facilities will continue to operate at their current capacity<sup>98</sup> and increased capacity will be realised through new facilities:</b> This is important as it allows for adequate capacity to be planned for, however in practice it is very possible that some additional capacity will be provided through the intensification of existing sites..."</li> </ul> <p><b>Proposed change</b> to paragraph 8.39:  "8.39 In Worcestershire many existing waste management operations currently take place on industrial estates. <i>This trend and the findings of the Industrial Estates Study indicate that this element of the Waste Core Strategy will be deliverable. However at the time of publication local planning authorities across Worcestershire, with the exception of Wyre Forest, have yet to locally determine future provision of employment provision. Development plan</i></p>

Respondent	Representation	Verbatim comment	Action
			<i>documents will need to be monitored as they emerge, to ensure that the Waste Core Strategy remains deliverable in the medium to long-term."</i>
<b>681/48 d</b> Mr J Brain Malvern Hills District Council	<b>Part:</b> Not specified <b>Legally compliant:</b> Yes <b>Sound:</b> Yes <b>Wish to participate at EiP:</b> Not specified	<b>CONSISTENT</b>  The waste core strategy is believed to be consistent with national policy and it is further considered the DPD provides clear and convincing reasoning to justify the prescribed approaches.	<b>No changes proposed.</b>  Support noted.
<b>681/48 e</b> Mr J Brain Malvern Hills District Council	<b>Part:</b> Not specified <b>Legally compliant:</b> Yes <b>Sound:</b> Yes <b>Wish to participate at EiP:</b> Not specified	In conclusion we believe the Worcestershire Waste Core Strategy meets the tests of soundness and that it is legally compliant.	<b>No changes proposed.</b>  Support noted.
<b>1679/49 a</b> Mr N Roberts Axis on behalf of Mercia Waste Management	<b>Part:</b> 2.39-2.43, Appendix 4, Tables 2, 3 and 10 <b>Legally compliant:</b> Not specified <b>Sound:</b> No <b>Reason:</b> not	We continue to fail to understand in detail how the capacity gap has been calculated. The figures appear to differ significantly from the First Draft Submission of the Worcestershire Core Strategy (Sept 2010). In respect of Appendix 4, we believe the MSW 'other recovery' gap is fundamentally incorrect but cannot understand how these figures	<b>Changes proposed.</b>  Axis was contacted on 6 <sup>th</sup> June 2011 (see Appendix 9: Correspondence with Axis (on behalf of Merica Waste Management) ) to confirm that they are satisfied with the following proposed changes. An initial reply has been received and the Council are arranging to meet with the representor.  Full details of how the capacity gap for all waste streams has been calculated are given in the background document

Respondent	Representation	Verbatim comment	Action																														
	justified, not effective  <b>Wish to participate at EiP: Yes</b>	have been derived. The capacity gap assessment needs to be simplified, use common headings and present a clearer picture over the full plan period.	<p>"<i>Arisings and capacity</i>".</p> <p>Some of the figures were re-addressed following the <b>First Draft Submission</b> consultation in order to take into account concerns which were expressed by a number of respondents regarding some of the data used and to address the capacity gap in a way which more closely reflects the Waste Hierarchy.</p> <p>However, with regard to Municipal Solid Waste (MSW) arisings and projections, the figures have not changed since the <b>First Draft Submission</b> consultation and remain the same projections used in the JMWMS. The version of the "<i>Arisings and capacity</i>" document published alongside the <b>First Draft Submission</b> consultation, dated September 2010, makes the following assumptions in <b>Table 15 (MSW Projections; tonnes p.a. (Worcestershire and Herefordshire combined))</b>:</p> <table><tr><td></td><td><b>2007 (baseline)</b></td><td><b>2010</b></td><td><b>2015</b></td><td><b>2020</b></td><td><b>2025</b></td><td><b>2034</b></td></tr><tr><td>MSW arisings per year (tonnes)</td><td>395,993</td><td>405,139</td><td>421,817</td><td>438,496</td><td>455,175</td><td>485,197</td></tr></table> <p>and the version published alongside the <b>Publication Document</b> (Regulation 27) consultation, dated 9<sup>th</sup> March 2011, repeats these with the addition of the 5 year interval for 2030 in <b>Table 34 (MSW Projections; tonnes p.a. (Worcestershire and Herefordshire combined))</b>:</p> <table><tr><td></td><td><b>2007 (baseline)</b></td><td><b>2010</b></td><td><b>2015</b></td><td><b>2020</b></td><td><b>2025</b></td><td><b>2030</b></td><td><b>2034</b></td></tr><tr><td>MSW arisings per year (tonnes)</td><td>395,993</td><td>405,139</td><td>421,817</td><td>438,496</td><td>455,175</td><td>471,854</td><td>485,197</td></tr></table> <p>Following government thinking that there should be closer integration in planning for all waste streams, the capacity gaps for all waste streams have been combined in Tables 2, 3 and 10 in the <b>Publication Document</b>. The full details of how these have been worked out are set out in the "<i>Arisings and capacity</i>"</p>		<b>2007 (baseline)</b>	<b>2010</b>	<b>2015</b>	<b>2020</b>	<b>2025</b>	<b>2034</b>	MSW arisings per year (tonnes)	395,993	405,139	421,817	438,496	455,175	485,197		<b>2007 (baseline)</b>	<b>2010</b>	<b>2015</b>	<b>2020</b>	<b>2025</b>	<b>2030</b>	<b>2034</b>	MSW arisings per year (tonnes)	395,993	405,139	421,817	438,496	455,175	471,854	485,197
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Respondent	Representation	Verbatim comment	Action
			<p>document. Appendix 4 in the WCS <b>Publication Document</b> has been included to show the proportions from each waste stream and the predicted source of arisings in more detail.</p> <p>The 'other recovery' capacity gap for all waste streams detailed in Appendix 4 of the <b>Publication Document</b> is based on:</p> <ul style="list-style-type: none"> <li>• C&amp;I waste - achieving targets of 55% re-use and recycling, 20% recovery, 25% landfill</li> <li>• Hazardous waste - achieving targets of 55% re-use and recycling, 20% recovery, 25% landfill</li> <li>• MSW – achieving targets of 50% re-use and recycling (including composting), 23% recovery, 22% landfill, with provision for the remaining 5% as either re-use and recycling or recovery (making the totals 55% and 28% respectively).</li> </ul> <p>This is set out in Section 4 of the March 2011 "<i>Arisings and capacity</i>" document and Objective WO3 in the Waste Core Strategy <b>Publication Document</b>.</p> <p>The targets used in the Waste Core Strategy for MSW have considered the JMWMS, but do differ from them by setting a more demanding target for 2020. These are in line with national targets for household waste. The range of targets considered, the options chosen and a risk assessment of the approach are shown on pages 74-79 of the March 2011 "<i>Arisings and capacity</i>" document.</p> <p>To summarise the differences: the reviewed JMWMS contains a variety of targets, which reflect the Waste Strategy for England 2007 in Target 3 and Best Practicable Environmental Option assessment in Target 5, although these are difficult to compare as target 3 relates to <b>household</b> waste and target 5 to <b>municipal waste</b></p>

Respondent	Representation	Verbatim comment	Action
			<p>The Waste Core Strategy targets are to recover value from 78% of MSW by 2020, made up of:</p> <ul style="list-style-type: none"> <li>• 50% re-use and recycling (including composting)</li> <li>• 23% recovery (With 22% as landfill/disposal)</li> </ul> <p>However, this means the remaining 5% could be managed by re-use, recycling or recovery. Therefore, to ensure all possible scenarios are enabled, in calculating capacity requirements, we have made provision for the additional 5% to be managed by either re-use and recycling or recovery, calculating:</p> <ul style="list-style-type: none"> <li>• the re-use and recycling capacity requirement at 55% and</li> <li>• the recovery requirement at 28%. (With 22% as landfill/disposal).</li> </ul> <p>These targets have formed the basis for the MSW capacity gap for 're-use and recycling' and 'other recovery' and as such have informed our calculations of land requirements and assessment of deliverability of the Waste Core Strategy.</p> <p>Having considered your comments we agree that the wording of the target in objective WO3 is not as clearly expressed as it could be, and for clarification we propose the changes as follows:</p> <p><b>Proposed change</b> to objective WO3:  <b>"WO3 To make driving waste up the waste hierarchy the basis for waste management in Worcestershire.</b>  <i>The following minimum targets for re-use and recycling, (including composting) and 'other recovery' have been set in relation to this objective<sup>47</sup>:</i>  <i>C&amp;I incl Hazardous and Agricultural waste - 75%</i>  <i>C&amp;D - 75%</i></p>

Respondent	Representation	Verbatim comment	Action
			MSW - 78%, with a target of 50% <b>re-use and recycling and composting</b> by 2020, <b>23% 'other recovery'</b> and a maximum of 22% landfill/ <b>disposal And (the remainder remaining 5% as either re-use and recycling or 'other recovery') energy recovery.</b> "
<b>1679/49 b</b> Mr N Roberts Axis on behalf of Mercia Waste Management	<b>Part:</b> 2.39-2.44, Appendix 4, Tables 2, 3 and 11 <b>Legally compliant:</b> No <b>Sound:</b> Not specified <b>Wish to participate at EiP:</b> Yes	The calculation of the capacity gap has not had regard to the information contained in the Joint Municipal Waste Management Strategy 1st Review. It presents inconsistent figures, particularly in respect of future MSW capacity requirements for 'other recovery'.	See response to 1679/49 a.
<b>1679/49 c</b> Mr N Roberts Axis on behalf of Mercia Waste Management	<b>Part:</b> Figure 14 <b>Legally compliant:</b> Not specified <b>Sound:</b> No <b>Reason:</b> not effective <b>Wish to participate at EiP:</b> Yes	Annex A Figure 19 shows the identified areas of search for suitable sites for most waste management developments. This lists Hartlebury Trading Estate in the Geographic Hierarchy Level 1 (The Kidderminster Zone). Detailed analysis of Figure 14 indicates that the map is in error by not encompassing Hartlebury Trading Estate within the Level 1 area. Consultation with Worcestershire County Council Planners has indicated this is an error. Nevertheless, the Waste Core Strategy is internally inconsistent and Figure 14 should be revised in order for the Waste Core Strategy to be effective.	<b>No changes proposed.</b>  Figure 14: Key Diagram: Geographic Hierarchy provides a diagrammatic representation of the spatial strategy. Hartlebury Trading Estate is not identified specifically on this diagram, nor are any other industrial estates. Annex A Figure 19 outlines the zones into which the Council considers the listed industrial estates to fall and specifies Hartlebury Trading Estate as being in Geographic Hierarchy level 1 "Kidderminster zone".



Respondent	Representation	Verbatim comment	Action
<b>1679/49 d</b> Mr N Roberts Axis on behalf of Mercia Waste Management	<b>Part:</b> 2.58, 3.8, WCS1, WCS4, Annex A, Figure 13, Figure 14  <b>Legally  compliant:</b> Not specified  <b>Sound:</b> No  <b>Reason:</b> not justified, not effective  <b>Wish to  participate at  EiP:</b> Yes	The Waste Core Strategy in defining its Geographical Hierarchy fails to give due regard to the environmental constraints/needs with certain types of waste facility specifically open windrow composting (OWC). The national evidence base (manifested through the Environment Agency Position Statement Nov 2010) restricts OWC development within 250 meters of any sensitive receptor (including places of work, gardens etc). The basis of defining the Geographic Hierarchy and the sites listed in Annex A fail to take regard to this position and cannot be justified. In addition, the Waste Core Strategy is not effective as it is not based on sound infrastructure delivery planning, nor reflects this national regulatory barrier to delivery. The Waste Core Strategy should treat OWC differently in terms of the Geographical Hierarchy and thus Policies WCS1 and WCS 4 should be amended. In particular we note that active landfill sites and mineral workings should be compatible land uses, as should greenfield sites. This would reflect the fact that the County's major OWC facility is located on a landfill within Level 3 and many OWC facilities throughout the UK are similarly located on landfills or greenfield sites.	<b>No changes proposed.</b>  The geographic hierarchy is defined based on levels of waste arisings, resource demand, onward treatment facilities, connections to the strategic transport network and potential for future development of waste management facilities and is designed to direct development to the most appropriate areas of the county. The zones within the geographic hierarchy cover urban and surrounding areas. However, the Waste Core Strategy should be considered as a whole. Policy WCS4 sets out compatible land uses and policy WCS11 considers the potential impacts from waste management development on amenity.  Policy WCS11 and paragraph 5.46-5.50 consider the potential impacts from waste management facilities on amenity, including consideration of bioaerosols and the Environment Agency's requirement for bioaerosol risk assessments for development managing biodegradable waste within 250 metres of sensitive receptors.  Policy WCS4 identifies redundant agricultural or forestry buildings or their curtilage and sites with current use rights for waste management purposes as compatible land uses. In addition, active mineral workings and landfill sites are identified as a compatible land use for open windrow composting where a clear operational relationship is demonstrated. This is to reflect the temporary nature of these types of activities and links closely to the justification for policy WCS 5.  Waste water treatment facilities, open windrow composting and landfill are the only land uses identified as compatible with greenfield land, however these must be strongly justified due to the potential impact of hard-standings and other associated infrastructure.

Respondent	Representation	Verbatim comment	Action
			Section 8 considers the deliverability of the Strategy, including whether it is realistic to expect facilities to be delivered on the land types identified in policy WCS4. The range of locations suitable for open windrow composting may be limited and where this is the case, this may support an application for open windrow composting in lower levels of the geographic hierarchy.
<b>1679/49 e</b> Mr N Roberts Axis on behalf of Mercia Waste Management	<b>Part:</b> WCS2 <b>Legally compliant:</b> Not specified <b>Sound:</b> No <b>Reason:</b> not justified <b>Wish to participate at EiP:</b> Yes	The quoting of stack heights in Policy WCS2 Part b. has no meaningful purpose and is not derived from a robust/credible evidence base. They are meaningless in terms of defining locations and wholly ignore other factors that influence stack height. They appear to be derived from the Habitat Regulations Assessment, but have no place in this policy. The emissions from a 250,000tpa facility are dictated by numerous factors and thus there is no definition of what typically would be emitted from a 250,000tpa facility with an 80m stack.	<p><b>Changes proposed.</b></p> <p>Axis was contacted on 6<sup>th</sup> June 2011 (see <i>Appendix 9: Correspondence with Axis (on behalf of Merica Waste Management)</i> ) to confirm that they are satisfied with the following proposed changes. An initial reply has been received and the Council are arranging to meet with the representor.</p> <p>The quoted stack heights in Policy WCS2 part b are derived from the Waste Core Strategy Habitats Regulations Assessment (the HRA). As stated in paragraph 3.19, the limits set represent the findings of the HRA modelling assessment and the level at which it was indicated that there would be no likely significant effects on the Lyppard Grange Ponds Special Area of Conservation (SAC). This part of the policy is intended to protect the SAC. To clarify the assumptions behind these throughputs and stack heights and enable assessment of the impact of any proposals, we propose the following change:</p> <p><b>Proposed change</b> to policy WCS2 part b:</p> <p><i>"b) where they are located at the highest appropriate level of the geographic hierarchy and it is demonstrated that:</i></p> <p><i>i. in level 1a and level 2:</i></p> <ul style="list-style-type: none"> <li>the <b><i>impact of emissions</i></b> will be the same as or less than a thermal treatment facility with a throughput of 250,000 tpa and a stack height of 80 metres <b><i>(as assessed in the Waste Core</i></b></li> </ul>

Respondent	Representation	Verbatim comment	Action
			<p><i>Strategy Habitats Regulations Assessment).</i></p> <p>ii. in level 1b:</p> <ul style="list-style-type: none"> <li>the <i>impact of emissions</i> will be the same as or less than a thermal treatment facility with a throughput of 150,000 tpa and a stack height of 80 metres (as assessed in the Waste Core Strategy Habitats Regulations Assessment)." </li> </ul>
<p><b>1679/49 f</b></p> <p>Mr N Roberts</p> <p>Axis on behalf of Mercia Waste Management</p>	<p><b>Part:</b> 5.32, 5.33, WCS9</p> <p><b>Legally compliant:</b> Yes</p> <p><b>Sound:</b> Yes</p> <p><b>Wish to participate at EiP:</b> Yes</p>	<p>Whilst the Waste Core Strategy is not unsound or legally compliant it is unrealistic to expect all types of waste facility to be able to provide 10% of their energy supply from renewable resources. As an example a Material Recycling Facility (MRF) or Mechanical Biological Treatment (MBT) plant will use significant quantities of energy in recycling waste or potentially making a renewable fuel. Both activities contribute to wider energy savings/climate change objectives. It would be inappropriate to hinder such development through this policy requirement where sourcing 10% of the energy need from renewables is either impractical or makes the development non-viable. As such it is suggested that Policy WCS9 criterion d. should have the following caveat: "unless it can be demonstrated that wider sustainable development objectives would be met by the proposal and the provision of renewable energy supply is either not practical or makes the scheme non-</p>	<p><b>Changes proposed.</b></p> <p>Axis was contacted on 6<sup>th</sup> June 2011 (see <i>Appendix 9: Correspondence with Axis (on behalf of Merica Waste Management)</i> )to confirm that they are satisfied with the following proposed changes. An initial reply has been received and the Council are arranging to meet with the representor.</p> <p>We do not consider that the first part of your suggested wording "unless it can be demonstrated that wider sustainable development objectives would be met by the proposal" is appropriate as this would effectively exclude the majority of facilities managing waste at the higher levels of the waste hierarchy (i.e. re-use, recycling, composting and potentially also energy recovery).</p> <p>However, we propose the following changes:</p> <p><b>Proposed change</b> to policy WCS 9 d:</p> <p>"all new built development or significant alterations to buildings which create a gross building footprint of 1000 square metres or more gaining at least 10%<sup>78</sup> of energy supply annually from on-site renewable sources. <i>Where it is demonstrated that this is not practicable, this should be achieved through off-site solutions</i>; and"</p> <p><b>Proposed change</b> to Paragraph 5.33:</p>

Respondent	Representation	Verbatim comment	Action
		viable.”	<i>"The suitability <b>and viability</b> of particular methods will depend on the type of development and the proposed location. The design and operation of proposals for renewable energy provision should address potential amenity and environmental effects in line with the requirements of the Development Plan."</i>
<b>1679/49 g</b> Mr N Roberts Axis on behalf of Mercia Waste Management	<b>Part:</b> WCS10 <b>Legally compliant:</b> Not specified <b>Sound:</b> No <b>Reason:</b> not consistent <b>Wish to participate at EIP:</b> Yes	Policy WCS10 criterion c. makes the provision that waste facilities would not be permitted where they constitute inappropriate development in the Green Belt. This is inconsistent with national policy (e.g. PPS10 paragraph 3 and PPG2) where inappropriate development can be permitted if very special circumstances can be demonstrated. Indeed paragraphs 5.44 and 5.45 of the Waste Core Strategy explicitly recognises this fact. As a consequence criterion c. of Policy WCS 10 should have the following wording added: “unless very special circumstances can be demonstrated”.	<b>Changes proposed.</b> Axis was contacted on 6 <sup>th</sup> June 2011 (see <i>Appendix 9: Correspondence with Axis (on behalf of Merica Waste Management)</i> ) to confirm that they are satisfied with the following proposed changes. An initial reply has been received and the Council are arranging to meet with the representor. <b>Proposed change</b> to policy WCS10 part c: <i>"do not constitute inappropriate development in areas designated as Green Belt<sup>83</sup> <b>or where very special circumstances are demonstrated which justify such inappropriate development</b>"</i> In accordance with PPS 10, this allows for the Waste Core Strategy to "protect green belts but recognise the particular locational needs of some types of waste management facilities ...in determining planning applications, that these locational needs, together with the wider environmental and economic benefits of sustainable waste management, are material considerations that should be given significant weight in determining whether proposals should be given planning permission" (PPS 10).
<b>1679/49 h</b> Mr N Roberts Axis on behalf of Mercia Waste	<b>Part:</b> WCS10 <b>Legally compliant:</b> No <b>Sound:</b> Not	Policy WCS10 criterion c. makes the provision that waste facilities would not be permitted where they constitute inappropriate development in the Green Belt. This is inconsistent with national	See response to 1679/49 g.

Respondent	Representation	Verbatim comment	Action
Management	specified <b>Wish to participate at EiP:</b> Yes	policy (e.g. PPS10 paragraph 3 and PPG2) where inappropriate development can be permitted if very special circumstances can be demonstrated. Indeed paragraphs 5.44 and 5.45 of the Waste Core Strategy explicitly recognises this fact. As a consequence criterion c. of Policy WCS 10 should have the following wording added: “unless very special circumstances can be demonstrated”.	
<b>1679/49 i</b> Mr N Roberts Axis on behalf of Mercia Waste Management	<b>Part:</b> WCS2, WCS11 <b>Legally compliant:</b> No <b>Sound:</b> Not specified <b>Reason:</b> not consistent <b>Wish to participate at EiP:</b> Yes	We believe that the final paragraph in both Policies WCS2 and WCS11 sets the wrong test in terms of national planning policy. The use of the word exceptional sets the highest possible test for approving a proposal that is contrary to development plan policy. The appropriate test is that a proposal which is not located in accordance with WCS2 or has unacceptable adverse impacts on local amenity should only be approved if material considerations indicate that the overall benefit of the scheme outweighs its harm. As a consequence the last paragraph of both policies should be amended to read: “Where the proposal would not accord with the objectives of this policy, schemes will only be permitted where it is demonstrated that the benefits of the development at the proposed site clearly outweigh any unacceptable adverse impacts.” Such an	<b>Changes proposed.</b> Axis was contacted on 6 <sup>th</sup> June 2011 (see <i>Appendix 9: Correspondence with Axis (on behalf of Merica Waste Management)</i> ) to confirm that they are satisfied with the following proposed changes. An initial reply has been received and the Council are arranging to meet with the representor. We agree that 'exceptional' may set the wrong test, although we consider that a stringent test is necessary. We therefore propose the following changes. <b>Proposed change</b> to policy WCS2 final paragraph: " 'Other recovery' facilities will not be permitted in levels 3, 4 or 5 unless <b>exceptional circumstances are clearly demonstrated it is demonstrated that the benefits of the development in the proposed location clearly outweigh any unacceptable adverse impacts on local amenity.</b> " <b>Proposed change</b> to policy WCS11 final paragraph: <del>"Where these are not demonstrated, exceptional circumstances must be clearly justified by the applicant.</del> <b>Where these criteria are not met, waste management facilities will only be permitted where it is demonstrated</b>

Respondent	Representation	Verbatim comment	Action
		approach would be entirely consistent with the final paragraph of Policy WCS7.	<i>that the benefits of the development in the proposed location clearly outweigh any unacceptable adverse impacts on local amenity."</i>
4/50 B Morgan Network Rail	<b>Part:</b> Not specified <b>Legally compliant:</b> Not specified <b>Sound:</b> Not specified <b>Wish to participate at EiP:</b> Not specified	Thank you for providing us with this opportunity to comment on this Planning Policy document.  Upon the review of this document, Network Rail has no comments to make.	<b>No changes proposed.</b>
717/52 a Mr A Muller Natural England	<b>Part:</b> Not specified <b>Legally compliant:</b> Yes <b>Sound:</b> Yes <b>Wish to participate at EiP:</b> Not specified	Overview  Overall, Natural England welcomes the publication document (the WCS document). For the purposes of our remit we believe the WCS document to be sound and legally compliant.  The text reflects the dialogue held so far between Worcestershire County Council and Natural England on the subject of Habitats Regulations Assessment (see below). While broadly supportive of the WCS document we agree with the findings of the Sustainability Appraisal regarding further improvements that should be made in order to produce an optimally robust final WCS DPD.	<b>No changes proposed.</b>  Support noted.

Respondent	Representation	Verbatim comment	Action
<b>717/52 b</b> Mr A Muller Natural England	<b>Part:</b> Habitats Regulations Assessment  <b>Legally compliant:</b> Yes <b>Sound:</b> Yes <b>Wish to participate at EiP:</b> Not specified	<p>Habitats Regulations Assessment (HRA)</p> <p>We note the conclusions regarding ‘Area of search’ sites 3, 6, 7 and 8 i.e. that at this development plan document level of spatial planning ‘likely significant effect’ on the Lyppard Grange Ponds SAC cannot be entirely ruled out. Consistent with our previous discussions regarding HRA we view this as a case of ‘implementation uncertainty’, namely a situation where there are risks that significant adverse impacts upon a European Site (or sites) may occur but that in practice these will depend upon the precise nature and scale of the project or proposal. We acknowledge that the HRA has assumed a ‘worst case scenario’ in order to fully test the assessment process. This is consistent with the Habitats Regulations adherence to the ‘precautionary principle’.</p> <p>Natural England therefore welcomes the WCS document’s use of criteria based policies WCS 1 ‘Re-use and Recovery’ and WCS 2 ‘Other recovery’ (each supported by WCS7 Environmental Assets) to address this implementation uncertainty. In this way the plan has been adapted to avoid adverse impacts upon European Sites. Natural England concludes that the document appears compliant with the Habitats Regulations.</p>	<b>No changes proposed.</b>  Support noted.



Respondent	Representation	Verbatim comment	Action						
717/52 c Mr A Muller Natural England	<p><b>Part:</b> Sustainability Appraisal and Strategic Environmental Assessment</p> <p><b>Legally compliant:</b> Yes</p> <p><b>Sound:</b> Yes</p> <p><b>Wish to participate at EiP:</b> Not specified</p>	<p>Sustainability Appraisal (SA incorporating Strategic Environmental assessment or SEA)</p> <p>This letter is provided as Natural England’s formal response to your consultation under Directive 2001/42/EC (the Strategic Environmental Assessment Directive) at the Environmental Report stage for this plan or programme.</p> <p>Natural England notes and welcomes the findings of the SA document.</p> <p>We support the ‘mitigation recommendations’ set out in Table 8.3. and believe suitable text dealing with these improvements should be incorporated into the final, adopted DPD.</p> <p>We support the range of subject areas identified as potential indicators for monitoring the WCS. It will be important to ensure this ‘platform’ produces indicators that link through to the WCS and SA objectives.</p> <p>This opinion is based on the information provided by Worcestershire County Council and for the avoidance of doubt does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the plan or programme which is the subject of this consultation, and</p>	<p><b>Changes proposed.</b></p> <p>Natural England was contacted on 6<sup>th</sup> June 2011 (see <i>Appendix 10: Correspondence with Natural England</i>) to confirm that they are satisfied with the following proposed changes. Reply not yet received.</p> <p>In response to the mitigation recommendations set out in Table 8.3 of the Sustainability Appraisal:</p> <table><tr><th>No.</th><th>SA Recommendation</th><th>Our Response</th></tr><tr><td>1</td><td>Stronger incentives should be given to prioritise recycling and composting over residual waste treatment, for example by requiring applicants for recovery facilities to demonstrate that reuse and recycling have been “maximised” rather than “optimised” in policy WCS2 and by adopting a recycling target for C&amp;I waste.</td><td><p>The First Draft Submission version of the Waste Core Strategy used the term 'maximised' (previous policies WCS2 and WCS5). This was changed to 'optimised' in response to concerns from a number of consultees that 'optimise' would provide a more realistic and achievable requirement.</p><p><b>Proposed change to objective WO3:</b></p><p><b>"WO3 To make driving waste up the waste hierarchy the basis for waste management in Worcestershire.</b></p><p><i>The following minimum targets for re-use and</i></p></td></tr></table>	No.	SA Recommendation	Our Response	1	Stronger incentives should be given to prioritise recycling and composting over residual waste treatment, for example by requiring applicants for recovery facilities to demonstrate that reuse and recycling have been “maximised” rather than “optimised” in policy WCS2 and by adopting a recycling target for C&I waste.	<p>The First Draft Submission version of the Waste Core Strategy used the term 'maximised' (previous policies WCS2 and WCS5). This was changed to 'optimised' in response to concerns from a number of consultees that 'optimise' would provide a more realistic and achievable requirement.</p> <p><b>Proposed change to objective WO3:</b></p> <p><b>"WO3 To make driving waste up the waste hierarchy the basis for waste management in Worcestershire.</b></p> <p><i>The following minimum targets for re-use and</i></p>
No.	SA Recommendation	Our Response							
1	Stronger incentives should be given to prioritise recycling and composting over residual waste treatment, for example by requiring applicants for recovery facilities to demonstrate that reuse and recycling have been “maximised” rather than “optimised” in policy WCS2 and by adopting a recycling target for C&I waste.	<p>The First Draft Submission version of the Waste Core Strategy used the term 'maximised' (previous policies WCS2 and WCS5). This was changed to 'optimised' in response to concerns from a number of consultees that 'optimise' would provide a more realistic and achievable requirement.</p> <p><b>Proposed change to objective WO3:</b></p> <p><b>"WO3 To make driving waste up the waste hierarchy the basis for waste management in Worcestershire.</b></p> <p><i>The following minimum targets for re-use and</i></p>							



Respondent	Representation	Verbatim comment	Action		
		which may despite SA/SEA have adverse effects on the environment.			<p>recycling, (including composting) and 'other recovery' have been set in relation to this objective<sup>47</sup>: C&amp;I incl Hazardous and Agricultural waste - 75%, <b>with a minimum of 55% re-use and recycling</b> C&amp;D - 75%</p> <p>MSW - 78%, with a target of 50% recycling and composting by 2020, a maximum of 22% landfill and the remainder as energy recovery."</p>
			2	The WCS should give explicit support to the recycling of construction and demolition waste onsite in development projects in policy WCS14.	<p>Noted. It is conventional practice for on-site recycling of construction and demolition waste to take place under Permitted Development rights (up to 28 days in any calendar year, under the Town and Country Planning (General Permitted Development) Order 1995, Schedule 2, Part 4, Class B) or as an ancillary activity in the development. There is no evidence to suggest that this is a problem in Worcestershire. Statutory nuisance legislation exists</p>

Respondent	Representation	Verbatim comment	Action		
					<p>to protect amenity.</p> <p>Having considered this, we <b>propose a change</b> to paragraph 5.27:</p> <p><i>"Design and construction of new buildings where the re-use of existing buildings is not appropriate and any alterations to existing buildings should consider resource efficiency. Minimising the use of virgin materials could be done in part by re-using materials or using recycled materials where appropriate. <b>On-site recycling enables management of waste at source, reducing waste miles.</b>"</i></p>
			3	<p>Policies should require planning applications to demonstrate how a facility will be located to minimise waste miles, for example in policy WCS6.</p>	<p>The waste management industry operates in the free market and reflects the normal working of the economy. Instead of including specific policies on waste miles, which would not be enforceable, the spatial strategy has been developed to guide waste management</p>

Respondent	Representation	Verbatim comment	Action		
					facilities towards areas with the highest levels of waste arisings and resource demand, amongst other considerations.
			4	The supporting text to policy WCS9 should include reference to the role of waste transport in increasing energy efficiency and reducing greenhouse gas emissions.	<p>This is not considered to be an appropriate amendment. Policy WCS9 relates to the sustainable <b>design</b> and <b>operation</b> of the waste management facility itself. Waste transport is considered in policy WCS6. However, a reference could be added to the explanatory text to policy WCS6 in paragraph 4.9.</p> <p>Proposed change to paragraph 4.9:</p> <p><i>"All developments must take into account local movement and transportation policies in the adopted Local Transport Plan, Local Plans and Local Development Frameworks. <b>They and</b> should aim to minimise the impact of the development by reducing</i></p>

Respondent	Representation	Verbatim comment	Action		
					<i>the need for visitors and the workforce to travel <b>and the need to transport waste. These measures can increase energy efficiency and reduce greenhouse gas emissions associated with the waste management facility.</b>"</i>
			5	Applications for waste development should clearly show how impacts on flood risk, air quality, biodiversity, historic assets, residential amenity and open space will be avoided or enhancements delivered, for those sites in areas of search with constraints.	Applicants for waste management facilities are required to consider these issues through policies WCS8 (flood risk), WCS11 (air quality, residential amenity), WCS7 (biodiversity, historic assets) and policy WCS4 protects open space by preventing development of waste management facilities on greenfield land except for waste water treatment, open windrow composting and landfill where strongly justified.
			6	The WCS should promote flood risk reduction and water quality enhancement where practicable (WCS8).	Policy WCS8 addresses these issues and has been supported by the Environment Agency.

Respondent	Representation	Verbatim comment	Action		
			7	WCS10 should require the avoidance or minimisation of effects on landscape character and the quality of the built environment, and enhancement where practicable.	Proposed change to policy WCS10 part a: "a) <i>protect and enhance</i> <del>take account of</del> <i>local characteristics, through consideration of:...</i> "
1668/53 a Ms K Dowty	<b>Part:</b> Not specified <b>Legally compliant:</b> Not specified <b>Sound:</b> Not specified <b>Wish to participate at EiP:</b> Yes	<p>On the consultation document itself</p> <p>1. It is far too lengthy (117 pages) without any summary in PLAIN ENGLISH</p> <p>2. In order to comment on the document, I believe it is essential to read the majority of background documents. These background documents range from a substantial 35 pages to a whopping 115 pages and there are in excess of 50 documents. None of these documents are cross referenced to the strategy document or summarised, therefore leaving the reader confused and constantly going too and fro between</p>	<p><b>No changes proposed.</b></p> <p>The Publication Document (Regulation 27) is written as the final version of the Waste Core Strategy which we intend to submit to the Secretary of State for examination. Subject to any changes recommended by the Planning Inspector following this consultation and the Examination in Public, this is the document which will become the adopted Development Plan Document and form part of the Development Plan for Worcestershire. It therefore needs to be fit for purpose to provide planning policy which both developers and decision makers can utilise. This statutory consultation focuses on issues of soundness and legal compliance of the document, therefore it was not appropriate to produce a summary version.</p> <p>The background documents form the evidence base from which the Waste Core Strategy has been developed.</p> <p>In order to keep the Waste Core Strategy <b>Publication Document</b> as succinct as possible, whilst ensuring that the assumptions made and evidence base are transparent it has been necessary to include some of the supporting evidence in background documents. The <b>Publication Document</b> is intended to be read as a stand-alone document, with the background documents providing supplementary information for those who are interested in specific issues. Paragraph 1.14 of the <b>Publication Document</b> lists the background documents</p>		

Respondent	Representation	Verbatim comment	Action
		<p>documents. I therefore feel that this cannot be classed as a fair consultation and would like to register a formal complaint about the manner in which this supposed "consultation" has taken place. We, the general public, whilst intelligent, are not waste specialists or technical authors. I believe that the majority of residents across Worcestershire do not have the excessive amounts of time required to read all of these documents and the complexity of this extensive library of documents I would say is above the normal level of understanding from ordinary members of the public. I also feel that by making this overly complex, it reduces the amount of people who respond and it could also be argued that those who do take time to respond may not fully understand the documents to sufficiently comment. I feel that it shows that the consultation is not representative of the residents in Worcestershire and feel that the County Council are obviously bombarding the residents with all this technical jargon and complex documents to try and deter a proper response. Waste Core Strategy should have been taken on roadshows at supermarkets and village halls and published in newspapers in the same way as other consultations as it affects every resident in Worcestershire and it is important that every resident</p>	<p>which have been prepared (totalling 26) and their titles are intended to give a good indication of their subject matter. References are made within the Waste Core Strategy Publication Document to the background documents wherever this was considered to be useful (for example footnote 21 on page 11).</p> <p>We note that the respondent would like to register a formal complaint. An initial response was sent on 18<sup>th</sup> May 2011 (see <i>Appendix 6: Correspondence with Ms K Dowty</i>)</p> <p>The Waste Core Strategy has been subject to a number of previous consultations. The Emerging Preferred Options and the First Draft Submission consultations were both prepared with summary documents to facilitate understanding. As explained above, this Publication Document (Regulation 27) statutory consultation focuses on issues of soundness and legal compliance of the document, therefore it was not appropriate to produce a summary version.</p> <p>A public notice was placed in all County Newspapers and press releases were also sent, however the Council has no control over the stories which the media carry. The consultation was also advertised on the Council's website, twitter and facebook. Documents were available at all libraries, hub customer contact centres and on our website. Parish Councils, interest groups and individuals who had previously shown an interest were also contacted directly by mail or email.</p> <p>During early stages of the preparation of the Waste Core Strategy workshops were held; however interest and attendance rates were low, with a total of 39 people attending the three workshops held at the first stage of the consultation and only 13 attending during the second stage of the consultation. As levels of interest were low and the workshops were costly it was felt that it would be better to focus on other</p>

Respondent	Representation	Verbatim comment	Action
		<p>understands the implications.</p> <p>3. I fail to see how individuals can comment on the "legality" and "soundness" of the document without for example having in depth knowledge and a summary of the legislation and policies that have been applied. Again, For example, in order to comment on the legality of the sustainability appraisal, one of the documents you must read is 90 pages long without any cross referencing or easy summary.</p>	<p>methods of engagement during future consultations.</p> <p>The response form was designed to focus comments on the issues of soundness and legal compliance as these are the matters that will be considered by the Planning Inspector. Matters of soundness and legal compliance are set out in National Policy. We prepared a guidance note summarising these concepts to assist in the completion of the form.</p> <p>The Sustainability Appraisal is required by legislation.</p>
<p><b>1668/53 b</b> Ms K Dowty</p>	<p><b>Part:</b> Not specified <b>Legally compliant:</b> No <b>Sound:</b> No <b>Wish to participate at EiP:</b> Yes</p>	<p>On the Waste Core Strategy- Legal</p> <p>I feel that the WHOLE document is fundamentally flawed and is neither legally compliant or sound. Rather than list each individual area (for which I do not have time to do at this stage), I would like to comment on the entire document.</p> <p>I feel the Strategy is not legally compliant for the following reasons:</p> <p>1) Insufficient regard has been taken of the sustainability and habitat appraisals and these are incomplete. For example- it seems that there has been blatant disregard for sites of special scientific interest in Hartlebury (wilden marshes), Hartlebury Common protected heathland with rich biodiversity, no direct communication with RSPB with regards to protection of birds such as barn owls</p>	<p><b>Changes proposed.</b></p> <p>The Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA) have been taken into account in the preparation of the Waste Core Strategy. Examples of this can be seen in the Monitoring Schedule in Section 8 which includes the SA objectives alongside the Waste Core Strategy objectives, and the existence of Worcester zone b in the geographic hierarchy and spatial strategy which is a direct consequence of the findings of the HRA, although these are not the only instances of their influence on the Waste Core</p>

Respondent	Representation	Verbatim comment	Action
		<p>and wood larks and general lack of concern to protect the environment when considering the effects of landfill or proposed energy from waste plant in Hartlebury.</p> <p>2) I do not feel that sustainable objectives have been met and addressed correctly in this strategy document and feel that therefore the strategy is not legally sound e.g. objective to manage the waste in accordance with the waste hierarchy - reduce, re-use, recycling and composting, recovery and disposal. How can this be achieved if all district councils in Worcestershire are not operating consistent policies in their collection, sorting and disposal of waste e.g. some councils do not collect plastics or garden waste while other councils e.g. Wychavon collect food waste yet every second week the segregated food waste gets tipped straight in with the black bin rubbish which goes to landfill. How can</p>	<p>Strategy.</p> <p>The Habitats Regulations Assessment is required to consider the potential effects of the Waste Core Strategy on 'European sites', meaning Special Areas of Conservation, Special Protection Areas and Ramsar sites. It is not required to assess impacts on national sites such as SSSIs. However, these have been considered and policy WCS7 is designed to protect these assets, as well as species and habitats.</p> <p>The RSPB has been consulted alongside other consultees at each stage in the preparation of the Waste Core Strategy but has not responded. Other consultees with an environmental remit, including Worcestershire Wildlife Trust and Natural England, have responded and their responses taken into account in developing the Waste Core Strategy.</p> <p>In line with the vision and WO3 the Waste Core Strategy seeks to promote the management of waste at the highest appropriate level of the waste hierarchy. This will be implemented in particular through policies WCS1, WCS2, WCS3 and WCS14.</p> <p>Any decision regarding the methods used for the management of Municipal Waste are separate from the Waste Core Strategy which is related to the planning issues. 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.</p> <p>The JMWMS deals with how municipal waste should be managed. The Waste Core Strategy must set the policy framework by which all waste management facility developments must be assessed, including those brought forward from the JMWMS. Any application for planning permission will be determined on its merits, judged on the basis</p>



Respondent	Representation	Verbatim comment	Action
		<p>the strategy address the need for reduced CO2 and methane emissions if residents are confused as to what can be recycled and not consistent across the patch. As landfill consists of around 50% Commercial and Industrial waste (much of which is identical in composition to municipal solid waste), it seems that the council is wasting vast sums by not segregating out the commercial waste (especially food) and just automatically tipping in landfill. Why are the targets for recycling so low? If Lawrence's(the council recent partner for commercial waste) can recycle in excess of 80% of all its waste , why can't the council apply this across Worcestershire?</p> <p>From looking at the composition of municipal solid waste currently being landfilled around 86% of it can be recycled in some way shape or form (your own documents show the composition to include food, organic waste, paper, card, plastics, glass) with by far the greatest percentage being organic food waste which could either be composted or treated by anaerobic digestion rather than recovery by energy from waste plant. This organic waste if treated by means of anaerobic digestion can generate RENEWABLE energy. Energy from waste plants do not produce renewable energy in the truest sense-it is classed as renewable as it is burning</p>	<p>of the Development Plan, of which the Waste Core Strategy will form part.</p> <p>The targets set out in objective WO3 are based on the best available evidence. The options considered for setting targets for each of the waste streams are set out in the background document "<i>Arisings and capacity</i>", available on our website <a href="http://www.worcestershire.gov.uk/wcs">www.worcestershire.gov.uk/wcs</a>.</p> <p>See response to 1665/7 in relation to the current application for an Energy from Waste facility at Hartlebury Trading Estate.</p>

Respondent	Representation	Verbatim comment	Action
		<p>food waste and needs food waste to give the right calorific value.</p> <p>It seems to me that the legality is called into question again when you look at the apparent "need" for other recovery, particularly energy from waste as the documents clearly estimated the need for 0.5 of an efw facility which deals with 300,000 tonnes of waste per year. In reality the proposed incinerator (1.0) will only deal with 200,000 tonnes if it goes ahead. This suggests to me that the council does not have enough waste to burn in an incinerator and that it will not have sufficient capacity therefore resulting in a significant proportion of commercial and industrial waste being burnt. The strategy states that no new landfill is required however where are the 50,000 tonnes of ash going to be landfilled from the incinerator if it goes ahead?</p> <p>3) How can the strategy conform with the regional Spatial Strategy particularly on housing as this has been scrapped by the current government. The country is in a recession and the estimated volumes of new houses and population increase is simply now incorrect and out of date.</p>	<p>A capacity gap has been identified to ensure that sufficient provision is made for facilities to manage the amount of waste arising in Worcestershire. This does not impose a cap on development. The scale and operation of specific proposals will be brought forward by waste management operators and assessed against the policy framework of the development plan, including the Waste Core Strategy.</p> <p>Policy WCS2 part a iii and paragraph 3.15 require any residues from 'other recovery' facilities to be satisfactorily managed and disposed of.</p> <p>Whilst the government has stated its intention to revoke the Regional Spatial Strategies and there has been some uncertainty around its status over recent months, following a number of court judgements it remains part of the Development plan until it is formally revoked. In the absence of other national or local information, it is still the best available information on likely levels of development.</p> <p>This will be monitored as the situation changes. We propose to make changes to clarify this further (see response to 681/48 c).</p>

Respondent	Representation	Verbatim comment	Action
		<p>4) The strategy again breaches legal compliance with the Statement of Community Involvement and sustainability objective of participation by all. This has been breached due to lack of community involvement in the consultation process and all its predecessors without a representative and large enough sample from residents across Worcestershire. All of these consultations are not published in villages and people are not given the opportunity to comment and no explanations of policies and documents are given- I feel this shows that the council are trying to hide things or push things through quickly, with disregard to the community.</p> <p>5)The waste strategy has not adequately considered effects on human health of the waste proposals e.g. proposed energy from waste plant-it is well known that in areas around incinerators there is a much higher incidence of asthma and other respiratory ailments.</p> <p>6) The waste core strategy breaches national policy about developments in the Green Belt.</p>	<p>Each stage of development of the Waste Core Strategy has been advertised on the council's consultation portal, in the county's newspapers and all parish, town, city, borough and district councils have been consulted, as well as everyone who requested to be included on the Waste Core Strategy consultation database. The parish councils were advised in advance of the start of the Publication Document (Regulation 27) consultation to enable them to incorporate the consultation into their meeting schedules.</p> <p>The Emerging Preferred Options and the First Draft Submission consultations were both prepared with summary documents to facilitate understanding and responses from the general public. As explained above, this Publication Document (Regulation 27) statutory consultation focuses on issues of soundness and legal compliance of the document, therefore it was not appropriate to produce a summary version.</p> <p>Policy WCS8 protects amenity, including consideration of air quality, fumes, dust and bioaerosols. Emissions are regulated by the Environment Agency and will vary depending on the technology used and types of waste managed.</p> <p>Policy WCS10 part c and paragraphs 5.44 and 5.45 reflect national policy on Green Belt.</p> <p>Minor amendments are proposed to make more explicit reference to 'very special circumstances' as set out in national policy (see response to 1679/49g).</p>
1668/53 c	Part: Not	On the Waste Core Strategy- Soundness	<b>No changes proposed.</b>

Respondent	Representation	Verbatim comment	Action
Ms K Dowty	<p>specified</p> <p><b>Legally compliant:</b> Not specified</p> <p><b>Sound:</b> No</p> <p><b>Reason:</b> not justified, not effective, not consistent</p> <p><b>Wish to participate at EiP:</b> Not specified</p>	<p>The whole waste core strategy is fundamentally flawed and is neither justified, effective or consistent with national policy.</p> <p>1) The baseline data used in the calculations is inaccurate, out of date, has been re-classified in some cases so it is difficult to offer valid comparisons and is fundamentally flawed. It is this data that is being used to predict future requirements. The data used to construct the wcs did not take into account advancements such as the recycling plant at Norton nor the fact that recycling is significantly up since the original figures. The document clearly shows that there is an immense capacity gap for recycling facilities in the future yet this does not marry with the council's proposed recycling level. Surely if there is a shortage of recycling facilities anticipated in the future, the expectation is that recycling will be significantly increasing. In fact analysis of the data in differnt documents shows inconsistencies again and again.</p> <p>2) If the validity of the data is called into question, this invalidates the entire strategy document making it very definitely NOT sound. The council cannot "pick and choose" which data it wishes to use just merely because they feel some</p>	<p>The baseline data used is the best available. The alternatives considered and risk assessments of the approaches chosen are given in the background document Arisings and capacity gap <a href="http://www.worcestershire.gov.uk/wcs">www.worcestershire.gov.uk/wcs</a>.</p> <p>That document did take into account the capacity at the EnviroSort MRF at Norton. The alternatives considered and risk assessments for targets for re-use and recycling are also given in that document.</p> <p>The "Arisings and capacity gap" background document has been amended to make it easier to follow, however the data and assumptions remain unchanged. This is the most up-to-date data.</p> <p>Several of the background documents informed early stages in the development of the Waste Core Strategy but have not been updated in light of new information. Where this is the case it is clearly stated on the first page of the document.</p> <p>The Waste Core Strategy Publication document is based on the best available data. The Waste Data Interrogator is very useful for some purposes, but is less reliable for others. The background document "<i>Arisings and capacity</i>" states when this information has been used, the alternatives considered and the reasons for the options chosen. The Environment Agency has</p>

Respondent	Representation	Verbatim comment	Action
		<p>is more accurate than others. What authority and qualification does the council have to justify their use of this data? Why do people go to the trouble of producing data from waste data interrogator if it is not reliable? The council needs to use a consistent data source with appropriate caveats. Are the figures not available from Waste Data flow in Defra? How can the general public feel confident in a strategy which is based on inaccuracies and inconsistencies.</p> <p>3) The strategy is not justified if the council's waste contractor, A COMMERCIAL ORGANISATION WHICH IS SIGNIFICANTLY PROFITING FROM THE COUNCIL, is allowed to determine the appropriate technology and location of waste facilities!!!!</p> <p>4) Why does the council have to import waste from South West and East of England? Surely this breaches the core strategies of neighbouring authorities? How can the council prove that this waste</p>	<p>produced guidance notes which highlight some of the reliability issues related to this data. These relate to the way in which data is collected, for example there is no requirement for sites operating under an 'exemption' to provide the same level of data as those which require a licence.</p> <p>The Waste Data Flow figures from Defra have been used, but they only relate to Municipal Solid Waste arisings and therefore other sources must be used to establish the level of Commercial and Industrial, Construction and Demolition and Hazardous Waste arisings.</p> <p>Issues regarding the reliability of waste data are widely acknowledged and have been discussed with the RTAB (Regional Technical Advisory Body for waste) in developing the proposed RSS phase two revision.</p> <p>The Waste Core Strategy Publication document is based on the best available data. A risk assessment has been undertaken for the data used. The advantages, limitations and any assumptions made have been clearly outlined.</p> <p>In order not to stifle innovation and to allow the strategy to remain flexible to emerging technologies, the Waste Core Strategy is not technology specific. It contains policies which allow proposed facilities to be assessed in terms of the appropriateness of the proposed location and any potential impacts. Commercial and Industrial, Construction and Demolition and hazardous wastes are managed by commercial operators, and these principles apply to all waste streams.</p> <p>The Waste Core Strategy provides for commercial and industrial, construction and demolition and hazardous waste, which are mainly managed by private operators, as well as municipal waste which is managed by the council. Some cross boundary movements are inevitable and reflect the normal</p>

Respondent	Representation	Verbatim comment	Action
		<p>is not being double counted in the figures, therefore artificially inflating Worcestershire's waste total and invalidating estimated arisings, the basis for the entire strategy. I do not see sufficient evidence to give me confidence that the council has taken into account the most up to date waste information in basing its decisions.</p> <p>5) The Waste core Strategy is not deliverable or indeed able to be monitored. If there is huge doubt as to the accuracy of the data used in the baseline figures and the availability of key waste data, how can the implementation of the strategy be monitored correctly with consistent, clear evidence which is reliable? I do not believe elements of the WCS can be delivered due to financial and budgetary constraints currently being experienced by the council - in particular the proposed energy from waste plant in Hartlebury will require an amendment to the variation of PFI- unlikely to be approved in this current climate and the audit commission</p>	<p>workings of the economy.</p> <p>In addition some wastes require specialist management. For instance, one of the county's waste management companies performs a national function, reprocessing waste to extract and recycle precious metals. The economies of scale for this type of process are such that it is not feasible for the waste to be managed at a local level.</p> <p>The Waste Core Strategy is not able to impose barriers to the movement of waste. However objective WO5 is based on the achievement of 'equivalent self-sufficiency'. This means planning for facilities to manage the amount of waste equivalent to the county's arisings. In this way it avoids conflicting with neighbouring authorities' strategies.</p> <p>The basis and assumptions for each waste stream are discussed in the background document "<i>Arisings and capacity</i>".</p> <p>Section 8 discusses the implementation, deliverability and monitoring of the strategy. The monitoring schedule and its indicators have been devised to be monitorable.</p> <p>Any decision regarding the methods used for the management of Municipal Waste or the PFI contract are separate from the Waste Core Strategy which is related to the planning issues. 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.</p>

Respondent	Representation	Verbatim comment	Action
		<p>have already raised concerns about value for money and possible fines in the contract if it does not have enough waste to burn.</p> <p>6) I dont feel that the WCS is flexible enough to respond to increasing need to recycle and reduce climate change as many of the waste treatment options e.g. anaerobic digestion, mechanical biological treatment, gasification etc have not been thoroughly explored. I do not see any documents showing a cost /benefit analysis of each of the options within the WCS. This is necessary to enable the public (whose money the council is spending) to identify the best, most efficient and cheapest options in the treatment of waste.</p> <p>Fundamentally as I said I feel the entire strategy document is flawed. it is based on inaccurate ,out of date and incomplete information which in turn invalidates the entire strategy document and makes it neither legally compliant or sound. I would sincerely hope that my comments will be passed on the Inspector in order that he or she can investigate further.</p>	<p>In order not to stifle innovation and to allow the strategy to remain flexible to emerging technologies, the Waste Core Strategy is not technology specific. A cost-benefit analysis of the options would be the responsibility of waste management operators for all waste streams, not only Municipal Solid Waste.</p> <p>All representations will be forwarded to the inspector for consideration.</p>

Respondent	Representation	Verbatim comment	Action
		<p>In terms of what the council should be doing I think that the council should</p> <ol style="list-style-type: none"> <li>1. Segregate ALL food waste, including commercial and industrial and compost ALL or send for MBT /animal feed etc. There should be limited food waste going to landfill.</li> <li>2. Advise the public what CAN be recycled- roadshows at supermarkets etc Specifically plastics are very confusing. Maybe even a leaflet when people get council tax bill</li> <li>3. Financial benefits to residents who recycle more - liaise with Windsor Borough Council as they operate a voucher scheme- the more people recycle the more vouchers they get to spend at local shops. This promotes pride in the community and helps small businesses.</li> <li>4. Actively promote freecycle</li> <li>5. Reduce waste transport miles</li> </ol>	<p>Waste collection methods are beyond the remit of the Waste Core Strategy. Any decision regarding the methods used for the management of Municipal Waste are separate from the Waste Core Strategy which is related to the planning issues. 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. The Joint Municipal Waste Management Strategy is currently focusing on a waste minimisation programme, see their website <a href="http://www.letswasteless.com">www.letswasteless.com</a>.</p> <p>This is beyond the remit of the Waste Core Strategy, however freecycle and other projects and companies that enable the re-use of furniture and other items are promoted by the council through its other functions.</p> <p>The spatial strategy in the Waste Core Strategy is designed to aid a reduction in waste miles by guiding waste management development to zones with the highest levels of arisings or resource demand. Policy WCS6 also promotes the use of alternatives to road transport.</p>



Respondent	Representation	Verbatim comment	Action
		<p>6. Work with Lawrences and other recycling companies to get best practice as to how to recycle more (alternatively ask Lawrences to take over the entire waste contract)</p> <p>7. Don't use a single company for all waste collection and disposal. tender out to get the best price as I dont believe you are getting value for money from Severn Waste.</p> <p>8. Incentivise supermarkets to produce biodegradable plastic bags and to reduce food packaging e.g. discount off their business rates?</p> <p>I really hope you can take my comments on board.</p>	<p>Any decision regarding the methods used for the management of Municipal Waste or the PFI contract are separate from the Waste Core Strategy which is related to the planning issues. 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.</p> <p>This is beyond the remit of the Waste Core Strategy.</p> <p>All representations will be forwarded to the inspector for consideration.</p>
<p><b>1668/54 a</b> Mr N Dowty</p>	<p><b>Part:</b> Not specified <b>Legally compliant:</b> Not specified <b>Sound:</b> Not specified <b>Wish to participate at EiP:</b> Not specified</p>	<p>Firstly I lose count of how many of these consultations have been carried out now. It must be wasting WCC thousands and thousands of pounds, when surely there are better things to use the money on in these hard economic times. I am a financial director and company secretary of a very successful local family business, so like to think I can think through things in a logical manner but I am trying very hard to respond to your Waste Core Strategy document however not only is it EXCEPTIONALLY confusing but it is also extremely time consuming to even read. The document itself has 117</p>	<p><b>No changes proposed.</b></p> <p>The Waste Core Strategy has been prepared and consulted on in accordance with statutory requirements. Whilst it is important to be mindful of the cost of conducting the consultations, it is also important to conduct the consultations properly and allow people the opportunity to contribute to the development of the strategy.</p> <p>The Emerging Preferred Options and the First Draft Submission consultations were both prepared with summary documents to facilitate understanding and responses from the general public. The Publication Document (Regulation 27) is written as the final version of the Waste Core Strategy which we intend to submit to the Secretary of State for examination. Subject to any changes recommended by the Planning Inspector following this</p>

Respondent	Representation	Verbatim comment	Action
		<p>pages not to mention the plethora of background documents , the majority of which I feel need to be read in order to adequately comment on the strategy document. Each of the background documents has a minimum of around 35 pages with one having ANOTHER 115 pages !</p> <p>I dread to think what Joe public at large think about all these documents and I fail to understand how you expect community involvement and responses to a very important issue if you bombard the reader with such volume and fail to summarise IN PLAIN ENGLISH, not technical jargon, the key points of the strategy, what information you have used and why in reaching your draft document. Why through out all this very long winded process have their never been any forms of road shows or events, or if there have been they have been very poorly promoted? I can remember, in the not too distant past when WCC have been looking at transport there have been some form of events held, but with waste NOTHING! Its almost as though you want it like this so that it's all swept in, "under the carpet". I am presuming that some of the elected Councillors are meant to understand these documents. After seeing the fiasco at the planning meeting on the 1st March regarding the</p>	<p>consultation and the Examination in Public, this is the document which will become the adopted Development Plan Document and form part of the Development Plan for Worcestershire. It therefore needs to be fit for purpose to provide planning policy which both developers and decision makers can utilise. This statutory consultation focuses on issues of soundness and legal compliance of the document, therefore it was not appropriate to produce a summary version.</p> <p>In order to keep the Waste Core Strategy Publication Document as succinct as possible, whilst ensuring that the assumptions made and evidence base are transparent it has been necessary to include some of the supporting evidence in background documents. The Publication Document is intended to be read as a stand-alone document, with the background documents providing supplementary information for those who are interested in specific issues. Paragraph 1.14 of the Publication Document lists the background documents which have been prepared (totalling 26) and their titles are intended to give a good indication of their subject matter. References are made within the Waste Core Strategy Publication Document to the background documents wherever this was considered to be useful (for example footnote 21 on page 11).</p>

Respondent	Representation	Verbatim comment	Action
		incinerator I have some big doubts.	
1668/54 b Mr N Dowty	<b>Part:</b> Not specified <b>Legally compliant:</b> Not specified <b>Sound:</b> Not specified <b>Wish to participate at EiP:</b> Not specified	In order to comment on specific areas of the document rather than in general terms, the user has to have the entire printed document in front of them and have already read it in full to decide which policy number/paragraph /section to comment on.	<b>No changes proposed.</b>  All documents were available to view online, or printed copies were available on request. This statutory consultation focuses on issues of soundness and legal compliance of the document, therefore it was necessary to ask for reference to specific parts of the Strategy with issues of soundness or legal compliance.
1668/54 c Mr N Dowty	<b>Part:</b> Not specified <b>Legally compliant:</b> Not specified <b>Sound:</b> Not specified <b>Wish to participate at EiP:</b> Not specified	In order for the reader to comment on the legality or soundness of the paper- the guidelines need to be clear and help the reader easily pinpoint the areas in which they believe the document is sound or legal or not i.e. I would expect a list of relevant legislation that has been considered along with a summary of that legislation to assist the reader in making an informed decision as to whether they feel that the strategy document is compliant. I do not feel it is appropriate to list significant documents and expect the reader to read "blind" without linking it to the Waste Core Strategy. How, for example , can I comment on "participation" evidence if I do not know how many people and where they are located who are commenting on the	<b>No changes proposed.</b>  The response form was designed to focus comments on the issues of soundness and legal compliance as these are the matters that will be considered by the Planning Inspector. Matters of soundness and legal compliance are set out in National Policy. We prepared a guidance note summarising these concepts to assist in the completion of the form.  Summaries of the most relevant legislation and guidance are set out in the background documents relating to 'waste streams', 'waste management facilities' and where relevant those background documents that address the 'key themes'. In these documents the key points related to the topic of the background document are set out. Details of how these have been considered in the preparation of the Waste Core Strategy are also given. We appreciate that it may have improved clarity if this assessment of legislation and guidance had been consolidated into one document, however this would be a lengthy document and could lead to some confusion if the comments were read out of the context of the background

Respondent	Representation	Verbatim comment	Action
		waste core strategy.	documents which addressed the topics as a whole.
<b>1668/54 d</b> Mr N Dowty	<b>Part:</b> Figures <b>Legally compliant:</b> Not specified <b>Sound:</b> Not specified <b>Wish to participate at EiP:</b> Not specified	Through out a lot of the documentation it is acknowledged that the figures used from the waste interrogator are inaccurate. This beggars the question, why are the WCC using some inaccurate figures as a starting point, thereby making any future assumptions inaccurate. Through out all reports and background information all the tables used have some fundamental flaws in them.	<b>No changes proposed.</b>  The baseline data used is the best available. The alternatives considered and risk assessments of the approaches chosen are given in the background document " <i>Arising and capacity</i> " available on our website <a href="http://www.worcestershire.gov.uk/wcs">www.worcestershire.gov.uk/wcs</a> .  See response to 1668/53c for further details.
<b>1668/54 e</b> Mr N Dowty	<b>Part:</b> Not specified <b>Legally compliant:</b> Not specified <b>Sound:</b> Not specified <b>Wish to participate at EiP:</b> Not specified	We currently have a Conservative/ Lib Dem led government who pride themselves on being greener, more environmentally friendly, recycle/ reuse etc. Why are WCC hell bent on wanting an incinerator when there are far better, cheaper ways of dealing with waste. Just look at what other countries are doing. I think the answer behind a lot of this stems from the fact that WCC have got on the "recycling band wagon" years too late and now have to do something quickly to save having to pay unnecessary fines from the EU.	<b>No changes proposed.</b>  In line with the vision and objective WO3, the Waste Core Strategy seeks to promote the management of waste at the highest appropriate level of the waste hierarchy. This will be implemented in particular through policies WCS1, WCS2, WCS3 and WCS14.  See response to 1665/7 in relation to the current application for an Energy from Waste facility at Hartlebury Trading Estate.
<b>1668/54 f</b> Mr N Dowty	<b>Part:</b> Not specified <b>Legally compliant:</b> Not	There is one point in one of the many background documents where WCC basically say that it will leave it to its waste contractor to decide the location and technology of how to deal with the	<b>No changes proposed.</b>  In order not to stifle innovation and to allow the strategy to remain flexible to emerging technologies, the Waste Core Strategy is not technology specific. It contains policies which allow proposed facilities to be assessed in terms of the

Respondent	Representation	Verbatim comment	Action
	specified <b>Sound:</b> Not specified <b>Wish to participate at EiP:</b> Not specified	waste. Why are WCC wasting all this money on producing all these substantial documents when it is obviously set on letting Mercia do what it wants. This again was obvious at the WCC planning meeting regarding the incinerator when the planning committee asked Mercia questions for about half an hour and all the other objectors no questions at all.	appropriateness of the proposed location and any potential impacts. Commercial and Industrial, Construction and Demolition and hazardous wastes are managed by commercial operators, and these principles apply to all waste streams, not just Municipal Solid Waste.
<b>1668/54 g</b> Mr N Dowty	<b>Part:</b> Not specified <b>Legally compliant:</b> Not specified <b>Sound:</b> No <b>Reason:</b> not justified <b>Wish to participate at EiP:</b> Not specified	The WCS is not justified. It is not founded on a credible evidence base. As already mentioned there are flaws everywhere in it. To only have this amount of time to comment on it is far too short for a full comprehensive response. There has been no participation from the local community . How can there be when the documents are so complex. The research / fact finding seems to be based on inaccurate figures, as the reports acknowledge several times.	<b>No changes proposed.</b>  The baseline data used is the best available. The alternatives considered and risk assessments of the approaches chosen are given in the background document " <i>Arisings and capacity</i> " available on our website <a href="http://www.worcestershire.gov.uk/wcs">www.worcestershire.gov.uk/wcs</a> .  See response to 1668/53c for further details.  Each stage of development of the Waste Core Strategy has been advertised on the council's consultation portal, in the county's newspapers and all parish, town, city, borough and district councils have been consulted, as well as everyone who requested to be included on the Waste Core Strategy consultation database. The parish councils were advised in advance of the start of the Publication Document (Regulation 27) consultation to enable them to incorporate the consultation into their meeting schedules. The consultation was listed on the council's online consultation portal a month in advance.
<b>1668/54 h</b> Mr N Dowty	<b>Part:</b> Not specified <b>Legally compliant:</b> Not specified	The WCS is not effective, deliverable or flexible. A lot of it seems to be left to WCC waste contractors to decide (that is the way its worded anyway). I forget how many years this has been looked at (far too long). I would suggest for it to be	<b>No changes proposed.</b>  In order not to stifle innovation and to allow the strategy to remain flexible to emerging technologies, the Waste Core Strategy is not technology specific. It contains policies which allow proposed facilities to be assessed in terms of the appropriateness of the proposed location and any potential

Respondent	Representation	Verbatim comment	Action
	<b>Sound:</b> No <b>Reason:</b> not effective <b>Wish to participate at EiP:</b> Not specified	flexible now the starting point for the base year assumptions need to be moved to more recent rather than using the out of date waste interrogator figures. after all in the current climate recycling has improved no end from the early years. Again in various parts of the report this seems an area WCC are not concerned about, the projections don't show increased recycling compared to other areas.	<p>impacts. Commercial and Industrial, Construction and Demolition and hazardous wastes are managed by commercial operators, and these principles apply to all waste streams, not just Municipal Solid Waste.</p> <p>The baseline data used is the best available. The alternatives considered and risk assessments of the approaches chosen are given in the background document "<i>Arising and capacity</i>" available on our website <a href="http://www.worcestershire.gov.uk/wcs">www.worcestershire.gov.uk/wcs</a>. The most up to date information has been used wherever possible. For example, the baseline data for C&amp;I waste has been updated to use the ADAS study 2009 rather than SWMA 2002/3 as in previous drafts of the strategy (see background document "<i>Arising and capacity</i>" for discussion of this), although MSW arising data from the Defra Waste Data Flow are available for 2008/9, the assumptions in the Waste Core Strategy are based on 2007/8 data to align with the JMWMS calculations.</p>
<b>1668/54 i</b> Mr N Dowty	<b>Part:</b> Monitoring <b>Legally compliant:</b> Not specified <b>Sound:</b> No <b>Reason:</b> not effective <b>Wish to participate at EiP:</b> Not specified	The WCS appears to be unmonitorable. After having first hand experience in some local landfill issues WCC appear very incapable of monitoring. It proves hard work to get the answers needed or to get issues sorted out.	<b>No changes proposed.</b> <p>Section 8 discusses the implementation, deliverability and monitoring of the Waste Core Strategy. The monitoring schedule and its indicators have been devised to be monitorable. This will be tested by the Inspector at examination.</p>
<b>1668/54 j</b> Mr N Dowty	<b>Part:</b> Not specified <b>Legally compliant:</b> Not	I feel that the whole of the WCS is inconsistent with national policy, especially some of the latest press releases which have not long been	<b>No changes proposed.</b> <p>The Waste Core Strategy is not technology specific. In line with the Waste Framework Directive, and the Waste Core Strategy's vision and objective WO3, the Waste Core Strategy seeks to</p>

Respondent	Representation	Verbatim comment	Action
	<p>specified</p> <p><b>Sound:</b> No</p> <p><b>Reason:</b> not consistent</p> <p><b>Wish to participate at EiP:</b> Not specified</p>	<p>issued to local planning authorities. Again there are some very big errors. For example the government is all about recycle/ reuse etc. It appears to be moving away from incineration for example; the opposite to what WCC are proposing.</p>	<p>promote the management of waste at the highest appropriate level of the waste hierarchy. This will be implemented in particular through policies WCS1, WCS2, WCS3 and WCS14.</p> <p>The Waste Core Strategy is in accordance with the Waste Strategy for England 2007 and Planning Policy Statement PPS10, which set out current national policy for waste.</p> <p>See response to 1665/7 in relation to the current application for an Energy from Waste facility at Hartlebury Trading Estate.</p>
<p><b>1668/54 k</b></p> <p>Mr N Dowty</p>	<p><b>Part:</b> Not specified</p> <p><b>Legally compliant:</b> Not specified</p> <p><b>Sound:</b> Not specified</p> <p><b>Wish to participate at EiP:</b> Not specified</p>	<p>To summarise the WCS seems to make selective provision for the protection of the green belt, offering no protection to the local area or local amenity in and around a large incinerator. There is already a huge decline in landfill. Our local landfills already say they have seen a huge decline in waste to landfill. This says one thing recycling is on the increase. It is also claimed that no new landfill capacity will be needed. Policy WCS3 states that there will be no more landfill except for when there is waste which cannot be recovered or recycled. One question, is this for the 50,000 tonnes of ash to be produced from incineration.</p>	<p><b>No changes proposed.</b></p> <p>Policy WCS10 protects the Green Belt in line with national policy. WCS 11 protects amenity from unacceptable adverse impacts from any type of waste management development.</p> <p>Minor amendments are proposed to make more explicit reference to 'very special circumstances' as set out in national policy (see response to 1679/49g).</p> <p>Our calculations of landfill requirement over the lifetime of the Waste Core Strategy (see background documents "<i>Arisings and capacity</i>" and "<i>Landfill</i>") show that there is no capacity gap for landfill and therefore no requirement for locations for new landfill sites to be identified in the Waste Core Strategy. This is based on current landfilling levels. We consider this to be a worst-case assessment because the rate of landfilling is actually declining, as you rightly observe. However, policy WCS3 acknowledges that there may be cases where landfilling is still necessary, and sets out limited circumstance where new landfill sites may be allowed. Policy WCS 2 requires proposals for 'other recovery' facilities must demonstrate that any residues can be satisfactorily managed or disposed of.</p>
<b>1668/54 l</b>	<b>Part:</b> Not specified	If I had more time I could have gone into more depth on this, but I do hope when	<p><b>No changes proposed.</b></p> <p>The Secretary of State will appoint an independent Planning</p>

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Mr N Dowty	<b>Legally compliant:</b> Not specified <b>Sound:</b> Not specified <b>Wish to participate at EiP:</b> Not specified	your report goes to the Secretary Of State, he gives it the full scrutiny it deserves and highlights the inaccuracies and difference to national policy. I do have grave concerns for the county of Worcestershire over the WCS over its implementation. I reserve the right to come back in the future with further information should I decide to if the WCS gets implemented.	Inspector to test the soundness and legal compliance of the Waste Core Strategy. The Inspector will consider all representations received and will decide on the matters which are discussed at the examination and who will be called to give evidence. Everyone who made a representation to this consultation will be kept informed throughout the process.
<b>1755/61</b> Mr N Laurenson	<b>Part:</b> Not specified <b>Legally compliant:</b> Not specified <b>Sound:</b> Not specified <b>Wish to participate at EiP:</b> Not specified	I believe that the granting of planning permission for a mass burn "energy from waste" incinerator on Hartlebury Trading Estate indicates that the county council is not serious about minimising carbon emissions. To begin with, increased waste miles will add to the carbon footprint, and I understand that Louise Brookes, a local resident and member of Worcestershire residents Against Incineration & Landfill, has sent you a much more detailed critique, which I hope you take into account.	<b>No changes proposed.</b> The Waste Core Strategy is not technology specific. In line with the vision and WO3 it seeks to promote the management of waste at the highest appropriate level of the waste hierarchy. This will be implemented in particular through policies WCS1, WCS2, WCS3 and WCS14. See response to 1665/7 in relation to the current application for an Energy from Waste facility at Hartlebury Trading Estate. See response below to 1645/87 (L Brookes) and others. All representations will be forwarded to the inspector for consideration.
<b>1738/78</b> Mr A Brookes  <b>1736/80</b> Mr M Wrench	<b>Part:</b> 3.20, 1.8, 2.47, 2.48, 3.26, 2.10, 3.24, WCS3, Pages 36-40, figure 16 <b>Legally compliant:</b> Not specified	The Waste core Strategy is extremely difficult to respond to due to its layout, and content. So I hope this response will be treated with equal importance, to the on line response.	<b>No changes proposed.</b> The Emerging Preferred Options and the First Draft Submission consultations were both prepared with summary documents to facilitate understanding and responses from the general public. The Publication Document (Regulation 27) is written as the final version of the Waste Core Strategy which we intend to submit to the Secretary of State for examination. Subject to any changes recommended by the Planning Inspector following this consultation and the Examination in Public, this is the document



Respondent	Representation	Verbatim comment	Action
<b>1735/81</b> Mr T Mackender  <b>1661/86</b> Ms S Cook  <b>1645/87</b> L Brookes (These respondents all sent a similar letter) (See also L571/90)	<b>Sound:</b> No  <b>Wish to participate at EiP:</b>  1738/78 - Not specified  1736/80 – Not specified  1735/81 – Not specified  1661/86 – Not specified  1645/87 – Not specified	<p>There are many points of concern raised within it, but due to the poor timing of the consultation period which coincides with the Easter, bank holidays and the Royal Wedding, I have do not have enough time go into more detail. There are many contradictory statements e.g. regarding landfill use.</p> <p><b>The whole strategy is unsound due to it being formed by the emerging preferred options report. This was incomplete and out of date. The County acknowledged that it was incomplete.</b></p>	<p>which will become the adopted Development Plan Document and form part of the Development Plan for Worcestershire. It therefore needs to be fit for purpose to provide planning policy which both developers and decision makers can utilise. This statutory consultation focuses on issues of soundness and legal compliance of the document, therefore it was not appropriate to produce a summary version.</p> <p>All representations will be forwarded to the inspector for consideration.</p> <p>Your comments about the consultation period are noted. The consultation was listed on the council's online consultation portal a month in advance and Parish councils were also written to in advance to enable them to arrange meetings to discuss the WCS if they felt this to be necessary.</p> <p>We do not consider there to be any contradictory statements regarding landfill use. Our calculations of landfill requirement over the lifetime of the Waste Core Strategy (see background documents "<i>Arisings and capacity</i>" and "<i>Landfill</i>") show that there is no capacity gap for landfill and therefore no requirement for locations for new landfill sites to be identified in the Waste Core Strategy. However, as policy WCS3 acknowledges, there may be cases where landfilling is still necessary. This policy sets out limited circumstances where landfill maybe allowed.</p> <p>The Waste Core Strategy has been developed in a number of stages, one of which was the Emerging Preferred Options report. The strategy was then developed and updated in response to consultation comments received and consulted on again as the First Draft Submission report. All comments received were taken into account and further development and refinement has resulted in the Publication Document (Regulation 27) consultation report.</p>

Respondent	Representation	Verbatim comment	Action
		<p><b>It cannot be envisaged that the waste core strategy will help the county realise the benefits of sympathetic relevant planning for <u>all of the people</u>, businesses and organisations it has been designed to serve. Or that waste management in the county will be dynamic, or respond to opportunities in other sectors, or that it will have significant beneficial effect on employment or bring economical benefits to the county. The reverse to all these may be true.</b></p> <p><b><u>Objectives of the Waste Core strategy</u></b>  <b><u>"To REDUCE GREEN HOUSE EMISSIONS, SUSTAINABLE DEVELOPMENT AND DRIVE WASTE UP THE HIERARCHY."</u></b></p> <p><b><u>Carbon Emissions</u></b></p> <p><b>The WCS is peppered with reference to climate change and reducing carbon emissions. However the granting of planning permission for a mass burn "energy from waste" incinerator on Hartlebury Trading Estate, indicates that the county council is not serious about minimising carbon emissions. New facilities may not therefore mitigate the effects of climate change, and may increase them greatly.</b></p>	<p>We note your comment, but consider that the policies contained within the Publication Document have been designed to achieve these aims. The issues you mention are set out on page 27 of the Publication Document as part of the vision. The objectives are set out on pages 32-33 and the policies which will contribute towards the delivery on these objectives are set out on table 4.</p> <p>Objective WO7 'To develop a waste management industry that contributes positively to the local economy' is contributed to by WCS4, WCS9, WCS12 and WCS13. Paragraphs 8.45 – 8.47 considers the deliverability of WO7.</p> <p>The Waste Core Strategy is not technology specific.</p> <p>In line with the vision and WO3 the Waste Core Strategy seeks to promote the management of waste at the highest appropriate level of the waste hierarchy. This will be implemented in particular through policies WCS1, WCS2, WCS3 and WCS14.</p> <p>See response to 1665/7 in relation to the current application for an Energy from Waste facility at Hartlebury Trading Estate.</p>

Respondent	Representation	Verbatim comment	Action
		<ul style="list-style-type: none"> <li>• Increased waste miles will add to the carbon footprint, (some waste will travel 70 miles.)</li> <li>• The geographical hierarchy appears to be inaccurate, with a facility sited in the north of 2 counties, instead of a location central to waste arisings.</li> <li>• WCS appears not to be technology neutral, contrary to the claim that it is. Many parameters seem to fit around the proposed Hartlebury incinerator facility and site. Stack height and emissions are referred to, along with other site features eg. Within pages 36-40 and throughout the WCS.</li> </ul> <p>Energy recovery</p> <ul style="list-style-type: none"> <li>• Paragraph 3.20 refers to incineration without energy recovery. Why is this?</li> </ul>	<p>The spatial strategy in the Waste Core Strategy is designed to aid a reduction in waste miles by guiding waste management development to zones with the highest levels of arisings or resource demand and Policy WCS6 also promotes the use of alternatives to road transport.</p> <p>The geographic hierarchy considers concentration of waste arisings, resource demand, onward treatment facilities, connections to the strategic transport network and potential for future development of waste management facilities. These factors have been used to identify broad areas, which are illustrated on Figure 14. Figure 14 does not identify specific sites.</p> <p>The facilities shown in Figure 6 are existing sites and have been checked against records of planning permissions and Environment Agency records.</p> <p>The references to stack height and emissions in policy WCS2 reflect the findings of the Habitats Regulations Assessment (the HRA). As stated in paragraph 3.19, the limitations represent the findings of the HRA modelling assessment at a level which shows no likely significant effects on the Lyppard Grange Ponds Special Area of Conservation which is a European designated site.</p> <p>Paragraph 3.20 refers to incineration without energy recovery to clarify what is regarded as 'disposal' for the purposes of the Waste Core Strategy. Incineration <u>with</u> energy recovery would be classed as 'other recovery' in accordance with the Waste Framework Directive.</p>

Respondent	Representation	Verbatim comment	Action
		<ul style="list-style-type: none"> <li>• Autoclaving and Anaerobic Digestion, both cheaper methods of creating energy from waste and further up the waste hierarchy than burning, are not specifically included in the WCS. Autoclaving and especially Anaerobic Digestion could deal with the "in county" biodegradable waste, producing energy and useful by products</li> <li>• It is suggested that new developments may include AD facilities within their proximity. Thus demonstrating the flexibility and cost effectiveness of such facilities is recognised by the council. Yet for some reason not considered on a larger scale.</li> <li>• The cost of gate fees for various waste disposal methods is included in Fig 16 but incineration is not included in this table. AD is much cheaper than other options and yet is not being specifically considered. Failing to include all technologies, especially those that have already been chosen, lacks transparency and fails to demonstrate value for money for the tax payer.</li> <li>• Wychavon District Council does not consider incineration of waste to be renewable energy.</li> </ul>	<p>The Waste Core Strategy is not technology specific and therefore inclusion or exclusion of any specific technology in the text carries no significance. Anaerobic Digestion is classed as recycling in the Waste Core Strategy (see Recycling in the Glossary on page 101). Autoclaving, if it recovered energy from the process, could be considered as 'other recovery'.</p> <p>Figure 16 is reproduced from a regional study by Advantage West Midlands, "<i>Waste – Future Resource for Business</i>" (2008) The report does not include equivalent information for other treatment methods and this information is not readily available elsewhere. It is intended to indicate relative costs across various waste management options. Although we recognise that Incineration or Energy from Waste facilities are not shown in Figure 16, we do not have the information available to supplement this study, and as the figure is intended to be indicative and the Waste Core Strategy is not technology specific, this is not considered to be an issue of soundness.</p> <p>This issue is addressed explicitly in the report to Planning and Regulatory Committee – 1 March 2011, regarding the Energy from Waste application at Hartlebury Trading Estate (available on the council's website</p>

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			<p><a href="http://www.worcestershire.gov.uk/cms/environment-and-planning/planning-applications/energy-from-waste-facility.aspx">http://www.worcestershire.gov.uk/cms/environment-and-planning/planning-applications/energy-from-waste-facility.aspx</a>) part of which explains :</p> <p>"222. The proposed EnviRecover Facility would recover approximately 15.5 MW of electricity; approximately 2MW would be required to run the operations with 13.5MW exported to the national grid. The applicant states that 60% of the energy output would be classed as renewable energy, relating to the proportion of the waste treated at the facility that is classed as biomass, i.e. from a renewable source, such as wood and food waste. The Landfill Directive notes that up to 68% of household waste is biodegradable.</p> <p>223. It is appropriate to consider how much of the energy recovered by the EnviRecover Facility will be classified as <b>renewable energy</b>. Those wastes that are not classed as biomass (eg plastics from fossil fuels) will not contribute to renewable energy, unless high quality heat is exported from the plant. However, this proportion might be expected to change over time, as waste generation, separation and collection systems evolve. Further, EfW facilities that meet the rWFD efficiency threshold (as the proposed facility does) are recognised in policy as contributing to the supply of renewable energy sought.</p> <p>224. As such, the Director of Planning, Economy and Performance is satisfied that the energy recovered by the proposed EnviRecover Facility will make a useful contribution to the renewable energy supplies sought by national policy and the Worcestershire Climate Change Strategy 2009 and enable future targets to be met. Using waste as the fuel, the EnviRecover Facility will also contribute to achieving climate change emissions reduction targets, particularly reducing the generation of methane contrary to concerns raised by W.A.I.L.</p>

Respondent	Representation	Verbatim comment	Action
		<p>Waste Arisings</p> <ul style="list-style-type: none"> <li>• The waste hierarchy is being disregarded as a "saved policy". Failing to adhere to it is difficult to reconcile with the Worcestershire objective of sustainable development and driving waste up the hierarchy. So cannot be considered sound.</li> <li>• Autoclaving and Anaerobic Digestion could deal with the "in county" biodegradable waste, the only part of the waste which would attract the extra landfill tax (LATS) when waste is sent to landfill. Yet this has not been made clear in the WCS and could mislead people into thinking the landfill tax would be paid on the total amount of waste ie 200.000 tonnes. When it will not be.</li> </ul> <p>Paragraph 1.8, states that <b>predicted waste arisings are based on the best available data</b>. Waste is falling dramatically and consistently, recycling is only at half potential capacity, so it is</p>	<p>and local residents."</p> <p>See response to 1665/7 in relation to the current application for an Energy from Waste facility at Hartlebury Trading Estate.</p> <p>The Waste Hierarchy is set out in European directives and national policy. Previously this was included as a policy in the Worcestershire Structure Plan. The Structure Plan will, in part, be replaced by the policies in the Waste Core Strategy. Appendix 2 lists the Structure Plan 'saved' policies which will be superseded by the adoption of the Waste Core Strategy. The Waste Hierarchy is an integral part of the Waste Core Strategy. In line with the vision and WO3, the strategy seeks to promote the management of waste at the highest appropriate level of the waste hierarchy. This will be implemented in particular through policies WCS1, WCS2, WCS3 and WCS14.</p> <p>The Waste Core Strategy Publication document does not make specific reference to LATS. Landfill tax is mentioned in paragraph 8.47 as one of the drivers for making provision for the treatment rather than the disposal of waste. The Waste Core Strategy is not technology specific and does not specify what these treatment options might be.</p> <p>However LATS are considered in the background document "Arisings and Capacity" and have informed the MSW targets set out in the Publication Document.</p> <p>Full details of the data options considered and used, as well as risk assessments for the approaches used, are contained in the background document "<i>Arisings and capacity</i>", available on our website <a href="http://www.worcestershire.gov.uk/wcs">www.worcestershire.gov.uk/wcs</a>. Although the most accurate data has been chosen as far as possible, a worst-case</p>

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		<p>difficult to understand the assumption that waste will increase so dramatically in the coming years. For a Waste Strategy to be considered "sound" it must arise from a sound evidence base, and as no sound evidence of an impending jump in arisings is offered, the proposed Strategy cannot be considered "sound" <b>How accurate is the data?</b></p> <ul style="list-style-type: none"> <li>• Paragraph 2.47 states that "cross boundary movement of waste is normal for facilities to remain viable." Are local facilities importing waste to remain viable?</li> <li>• Paragraph 2.48 states that <b>imports of county waste exceed exports</b>. There is also a statement that there will be no limit on the export or import of waste.</li> <li>• Recycling of 70% or more can be achieved, yet Worcestershire as a county only recycles approximately half of this currently. This should be increased to the highest level possible before any long term technology specific commitment is made.</li> </ul>	<p>approach has been taken and therefore potentially overestimates the amount of waste arising over the period of the Waste Core Strategy. This is in order not to constrain development by underestimating the level of need.</p> <p>Waste is similar to any other commodity in that it is influenced by market forces and therefore waste movements across local authority boundaries are inevitable. The Waste Core Strategy is concerned with all waste, including commercial and industrial waste, agricultural waste, construction and demolition waste, hazardous, clinical and radioactive waste, as well as municipal solid waste. Some wastes require specialist management. For instance, one of the county's waste management companies reprocesses waste to extract and recycle precious metals. The economies of scale for this type of process are such that it is not feasible for this to be managed at a local level and this particular facility performs a national function. The Waste Core Strategy is not able to impose barriers to the movement of waste. It employs the concept of 'equivalent self-sufficiency' to take account of this, thereby planning for facilities to manage the amount of waste equivalent to the county's arisings.</p> <p>The targets set in objective WO3 are to re-use, recycle or recover 75% of C&amp;I and C&amp;D waste and 78% of municipal waste. The options considered for setting targets for each of the waste streams are set out in the background document "<i>Arisings and capacity</i>", available on our website <a href="http://www.worcestershire.gov.uk/wcs">www.worcestershire.gov.uk/wcs</a>.</p>

Respondent	Representation	Verbatim comment	Action
		<p>The claims that an "Energy from Waste" incinerator is needed to deal with local waste, after all recyclable waste is removed seem at odds with the above points.</p> <p><b><u>Landfill</u></b></p> <p>The claim that no new landfill capacity will be needed is at odds with <b>POLICY WCS3</b> which states that there will be no more landfill EXCEPT FOR WHEN THERE IS WASTE WHICH CANNOT BE RECOVERED OR RECYCLED.</p> <p>• There is little or no viable market for incinerator bottom ash, so we fear that in spite of claims to the contrary, most of the 50.000 tonnes of ash produced per year will go to landfill, probably locally. Much more waste to landfill than if better recycling was in place, and biodegradable waste was treated with</p>	<p>A capacity gap has been identified for recycling, other recovery and disposals, however the Waste Core Strategy is not technology specific.</p> <p>In line with the vision and WO3 it seeks to promote the management of waste at the highest appropriate level of the waste hierarchy. This will be implemented in particular through policies WCS1, WCS2, WCS3 and WCS14.</p> <p>See response to 1665/7 in relation to the current application for an Energy from Waste facility at Hartlebury Trading Estate.</p> <p>Our calculations of landfill requirement over the lifetime of the Waste Core Strategy (see background documents "<i>Arisings and capacity</i>" and "<i>Landfill</i>") show that there is no capacity gap for landfill and therefore no requirement for locations for new landfill sites to be identified in the Waste Core Strategy. This is based on current landfilling levels and projections set out in the background documents "<i>Arisings and capacity</i>" and "<i>Landfill</i>". Policy WCS3 sets out circumstances where landfill may be allowed, these are where re-use, recycling and energy recovery are not practicable for the type of waste to be managed, where there is a shortfall in disposal capacity or where the proposal is essential for operational or safety reasons. It also sets the tests which must be met to allow new landfill sites to be developed.</p> <p>Policy WCS2 part a iii and paragraph 3.15 require any residues from 'other recovery' facilities to be satisfactorily managed and disposed of.</p> <p>See response to 1665/7 in relation to the current application for an Energy from Waste facility at Hartlebury Trading Estate.</p>



Respondent	Representation	Verbatim comment	Action
		<p>AD.</p> <ul style="list-style-type: none"> <li>• Local landfills have major and minor aquifers beneath them, there is great risk of contamination not just of surrounding land but of the water table, and drinking water, should any compounds leak into them or the ground.</li> <li>• There have already been major problems with land slippage and leachate contamination with these landfills.</li> </ul> <p>EXTENDING EXISTING SEWERS</p> <ul style="list-style-type: none"> <li>• Are there plans to extending the sewers on Hartlebury Trading estate, which are already at capacity, to take contaminated water from the cooling process of an incinerator? How will this water be discharged? How much will there be?</li> <li>• Are the county council aware of all previous and existing problems pertaining to contaminated water and leachate, are they also aware of the high grade farming land surrounding the site?</li> </ul>	<p>Policy WCS8 considers the potential impacts from any waste management facility on water resources. The Environment Agency is the pollution control authority responsible for issuing environmental permits for landfill sites. They will be consulted on all planning proposals for waste management facilities.</p> <p>Policy WCS9 part e considers land stability and subsidence. Also see above.</p> <p>See response to 1665/7 in relation to the current application for an Energy from Waste facility at Hartlebury Trading Estate.</p>

Respondent	Representation	Verbatim comment	Action
		<p><b><u>Landfill mining</u></b></p> <ul style="list-style-type: none"> <li>• <b>Paragraph 3.26 suggests the mining of historical landfills.</b> Given major past problems with slippage, and thousands of gallons of leachate being taken away in tankers, and also given that those problems took over 2 years to be resolved with little satisfaction, we understand that this activity is not being suggested with our locality in mind. We would also have great concerns should this practice be entertained elsewhere. It would be completely unacceptable.</li> <li>• Locally methane is currently being extracted and fed to the national grid thus creating energy. We could not accept disturbance of this, thus creating further slippage, and all that is entailed.</li> <li>• Mining landfills indicates an anticipated lack of waste, and the need to dispose of large amounts of un-usable incinerator ash. Why is this?</li> <li>• Reference is also made to land filling on land. We are very concerned that there are plans to create an ash mountain, when there is no more landfill capacity.</li> </ul> <p><b><u>Green belt</u></b></p> <p>The Waste Core strategy seems to be</p>	<p>Paragraph 3.26 makes reference to potential future 'landfill mining' proposals. This refers to the potential for materials such as metals to be recovered from historic landfills. It does not indicate an 'anticipated lack of waste' and at present such proposals seem unlikely. The council is aware of the potential hazards such a proposal could bring, and paragraph 3.26 makes clear that the Environment Agency would need to be consulted about any landfill mining proposal.</p> <p>The reference in paragraph 3.20 to the deposit of waste on land is intended to clarify that landraising proposals would be covered by policy WCS3. Landraising is a relatively common practice, for example to improve agricultural land by filling a hollow which impedes working the land, and also as a form of landfill, for example the existing landfill facility at Hill and Moor.</p> <p>Policy WCS10 protects the Green Belt in line with national policy. Policy WCS 11 protects amenity from unacceptable</p>

Respondent	Representation	Verbatim comment	Action
		<p>make <b>selective provision</b> for protection of the Green Belt, offering no protection to the local area or amenity.</p> <ul style="list-style-type: none"> <li>• Paragraph 2.10 states that <b>ONLY 1% OF the West Midlands is Grade 1 agricultural land quality, mostly in Herefordshire and Worcestershire. Much of the land is high grade 1 and 2 agricultural land. Farming</b> is a predominant feature of the area.</li> <li>• Livestock is farmed, as well as high grade, high intensity arable farming.</li> <li>• There are concerns that any dioxins, of which there are no safe limits, and extra traffic pollutants, will be detrimental to the crops and livestock and therefore be detrimental to the local economy. Pollutants can enter the body through ingestion of food.</li> <li>• Perception alone could be economically detrimental to local farms, and therefore the local economy.</li> <li>• There is great concern that the fragile bio diverse area which is being successfully maintained and enhanced by local farmers will be adversely affected by many aspects of the development of an incinerator in the</li> </ul>	<p>adverse impacts from any type of waste management development.</p> <p>Minor amendments are proposed to make more explicit reference to 'very special circumstances' as set out in national policy (see response to 1679/49g).</p> <p>The Environment Agency is the pollution control authority responsible for issuing environmental permits for waste management facilities. They will be consulted on all planning proposals for waste management facilities. Policy WCS11 considers potential impacts on air quality, fumes, dust, odours and bioaerosols.</p> <p>Policy WCS7 protects environmental assets, including designated sites, species, habitats and heritage assets. Policy WCS10 considers local landscape character.</p>

Respondent	Representation	Verbatim comment	Action
		<p>close proximity. It would seem that this has not been taken into account in the WCS.</p> <ul style="list-style-type: none"> <li>• <b>Sustainability should also refer to the local production of good quality food. The WCS seems to also over look this very important point.</b></li> </ul> <p><b><u>Noise mitigation</u></b></p> <ul style="list-style-type: none"> <li>• <b>Paragraph 3.24, again seems to have been written with the Hartlebury incinerator in mind. With reference to the normal excavation of large amounts of soil during the construction process.</b></li> <li>• <b>Reference is made to the construction of bunds, embankments, and features for noise attenuation and landscaping for noise mounds.</b></li> <li>• <b>This is clearly recognition that the incinerator will have a noise impact on the surrounding area. This will not protect amenity, and will adversely affect private property also.</b></li> </ul> <p><b><u>Consultation</u></b></p> <ul style="list-style-type: none"> <li>• <b>This has been poor in the locality with little public engagement, and no public meetings held by the local authority to discuss alternatives to waste management at an early stage, or indeed at any stage. We do not accept that</b></li> </ul>	<p>See above for a response to your previous points. Other agricultural issues are outside of the remit of the Waste Core Strategy.</p> <p>Excavation is a normal part of the construction process in creating foundations for buildings and this paragraph is included to ensure that consideration is given to the appropriate re-use or disposal of this material from all types of development, including the building of homes, shops, offices and industrial facilities.</p> <p>The reference to the construction of bunds, embankments or features for noise attenuation is not an expectation of noise impact (noise impacts are covered by policy WCS11) but rather to indicate that these types of features will be considered against policy WCS3 as a form of landfill and disposal.</p> <p>See response to 1665/7 in relation to the current application for an Energy from Waste facility at Hartlebury Trading Estate.</p> <p>The Waste Core Strategy has been subject to several previous stages of consultation. Each stage of development of the Waste Core Strategy has been advertised on the council's consultation portal, in the county's newspapers and all parish, town, city, borough and district councils have been consulted, as well as everyone who requested to be included on the Waste Core Strategy consultation database.</p>

Respondent	Representation	Verbatim comment	Action
		<b>community views have shaped the WCS</b>	<p>Parish councils were advised in advance of the start of the Publication Document (Regulation 27) consultation to enable them to incorporate the consultation into their meeting schedules. All comments received in response to previous rounds of consultation have been considered and our response to those comments published on our website.</p> <p>At each stage of consultation the Council has published response documents outlining how comment will be taken into account and has received positive feedback from several stakeholders regarding the way in which the development of the Waste Core Strategy has responded to these consultation comments.</p>
<b>1734/82</b> Mr M Greatbatch <b>1664/84</b> Mrs C Greatbatch <b>1664/85</b> Mr C Greatbatch	<b>Part:</b> WCS1 <b>Legally compliant:</b> Yes <b>Sound:</b> No <b>Reason:</b> not justified. <b>Wish to participate at EiP:</b> 1734/82 – Not specified 1664/84 – Not specified 1664/85 – Not specified	The increase in recyclable waste has only been since January of this year. Since this time I have noticed a marked decline in "normal waste". I do not think enough data can have been collected to assess future suitable waste needs and thus to make proposed incineration as a viable and cost effective method of waste disposal in the future. There are still more materials that can be recycled.	<b>No changes proposed.</b> The Waste Core Strategy is based on the best available data. See response to consultation comment 1668/53c for further details.
<b>1632/83 a</b>	<b>Part:</b> 5.45ff	I consider the WCS to be UNSOUND for the following reason: CONSULTATION	<b>No changes proposed.</b>

Respondent	Representation	Verbatim comment	Action
Mr M Nattrass, MEP	<b>Legally compliant:</b> Yes <b>Sound:</b> No <b>Reason:</b> not justified <b>Wish to participate at EiP:</b> Not specified	<p>There is no evidence that consultation either with me as a Stakeholder or with my constituents has informed the planning, wording and overall thrust of the Strategy. Public consultation driven by Worcestershire CC has been sketchy. Mercia Waste Management has consulted more widely, but even in this case, has failed to take on board the legitimate and well researched views which, through me, have been expressed by my constituents. For example, I have made the case for the exploration of Anaerobic Digestion as a potentially viable alternative to EfW. Fig 16, however, fails to include reference to or comparison of AD with other technologies. So the comparison is incomplete and not inclusive.</p>	<p>Each stage of development of the Waste Core Strategy has been advertised on the council's consultation portal, in the county's newspapers and all parish, town, city, borough and district councils have been consulted, as well as everyone who requested to be included on the Waste Core Strategy consultation database. The parish councils were advised in advance of the start of the Publication Document (Regulation 27) consultation to enable them to incorporate the consultation into their meeting schedules. All comments received in response to previous rounds of consultation have been considered and our response to those comments published on our website.</p> <p>As a point of clarification, this consultation relates to the Waste Core Strategy. Mercia Waste Management has no role in its preparation other than as a consultee.</p> <p>The Waste Core Strategy is not technology specific.</p> <p>Figure 16 is reproduced from a regional study by Advantage West Midlands, "<i>Waste – Future Resource for Business</i>" (2008) The report does not include equivalent information for other treatment methods and this information is not readily available elsewhere. It is intended to indicate relative costs across various waste management options. Although we recognise that Incineration or Energy from Waste facilities are not shown in Figure 16, we do not have the information available to supplement this study, and as the figure is intended to be indicative and the Waste Core Strategy is not technology specific, this is not considered to be an issue of soundness.</p>
<b>1632/83 b</b> Mr M Nattrass, MEP	<b>Part:</b> 5.6 <b>Legally compliant:</b> Yes	<p>I consider the WCS to be UNSOUND for the following reason: GREEN BELT: Para 5.45 indicates that development within the Green Belt "will not be permitted" unless very exceptional</p>	<p><b>Change proposed.</b></p> <p>This is in accordance with national policy.</p>

Respondent	Representation	Verbatim comment	Action
	<p><b>Sound:</b> No</p> <p><b>Reason:</b> not justified</p> <p><b>Wish to participate at EIP:</b> Not specified</p>	<p>circumstances exist which would allow such a development. This language is couched in the imperative. However:</p> <p>i. No definition of "very exceptional circumstances" is given. Without such as definition, it becomes impossible to quantify, to rationalise or indeed to challenge the circumstances of a proposed development in the Green Belt.</p> <p>ii. In paras 5.47 and 5.48, subsections which address reasons for the amendment or recasting of the Strategy, the language is non-imperative. Eg. "discuss" "Mitigation measures" "Special attention should be given" This dichotomy gives rise to the possibility of variable interpretations of the Strategy's requirements, or indeed to their relatively easy circumvention, should a contactor be so minded.</p> <p>iii. On Page 34 "Managing Waste as a Resource": The picture above policy</p>	<p>"Very special circumstances" reflects the requirements of national policy (PPS2). Minor amendments are proposed to make more explicit reference to 'very special circumstances' as set out in national policy (see response to 1679/49g).</p> <p>Planning applications must be determined in accordance with the development plan, of which the Waste Core Strategy will be part, unless material considerations suggest otherwise. The explanatory text does not give reasons for amending or recasting the Strategy but where relevant draws attention to issues that could be material considerations.</p> <p>Paragraph5.47 encourages applicants to engage with relevant stakeholders when developing proposal (before submitting a planning application) however the Council is not able to <b>require</b> developers to undertaken pre-application consultation. The Council would in any case consult the bodies listed in paragraph5.47 where relevant and would take any representation into account when determining the planning application.</p> <p>The considerations outlined in paragraph5.48 are also considerations under policies WCS7 and WCS10 and are included here to highlight the potential impacts of air emissions. The Waste Core Strategy should be read as a whole and these concerns are felt to be adequately covered by policies WCS7, WCS10 and WCS11.</p> <p>The pictures used throughout the Waste Core Strategy are intended to reflect the county of Worcestershire and the types of</p>

Respondent	Representation	Verbatim comment	Action
		WC1:1 Reuse and recycling is credited to Severn Waste, a company associated with Mercia Waste Management which is currently the preferred contractor for the propose EfW facility at the Hartlebury site. Such an obvious link does nothing to allay the fears of objectors and indeed other tendering companies that transparent procedures and protocols are being observed by WCC.	<p>waste management facilities which might be expected. For this reason, wherever possible we have used photographs of facilities from within Worcestershire. Severn Waste operates household recycling centres, a materials recycling facility and a landfill site in Worcestershire and have allowed us to use their photographs in the Waste Core Strategy. Other waste operators have been contacted and asked to provide photographs and details which we could include as 'case studies' in background documents and in the Waste Core Strategy, however only one of these operators provided details for the case study and none provided photographs.</p> <p><b>Change proposed:</b> photographs of other waste management facilities in Worcestershire to be included.</p>

#### Late responses

Respondent	Representation	Verbatim comment	Action
<p><b>L571/90</b> Ms S Taylor Elmley Lovett Parish Council  (Response received 20th May 2011)</p>	<p><b>Part:</b> 3.20, 1.8, 2.47, 2.48, 3.26, 2.10, 3.24, WCS3, Pages 36-40, Figure 16</p> <p><b>Legally compliant:</b> Not specified</p> <p><b>Sound:</b> No</p> <p><b>Wish to participate at EiP:</b> Not specified</p>	<p>The Waste core Strategy is extremely difficult to respond to due to its layout, and content. There are many points within it to disagree with, but a few key areas are highlighted. Our response is in the format we feel is best to enable us to highlight relevant concerns. There are many contradictory statements eg regarding landfill use.</p>	<p><b>No changes proposed.</b></p> <p>The Emerging Preferred Options and the First Draft Submission consultations were both prepared with summary documents to facilitate understanding and responses from the general public. The Publication Document (Regulation 27) is written as the final version of the Waste Core Strategy which we intend to submit to the Secretary of State for examination. Subject to any changes recommended by the Planning Inspector following this consultation and the Examination in Public, this is the document which will become the adopted Development Plan Document and form part of the Development Plan for Worcestershire. It therefore needs to be fit for purpose to provide planning policy which both developers and decision makers can utilise. This</p>



		<p>The whole strategy is unsound due to it being formed by the emerging preferred options report. This was incomplete and out of date. The County acknowledged that it was incomplete.</p> <p>It cannot be envisaged that the waste core strategy will help the county realise the benefits of sympathetic relevant planning for all of the people, businesses and organisations it has been designed to serve. Or that waste management in the county will be dynamic, or respond to opportunities in other sectors, or that it will have significant beneficial effect on employment or bring economical benefits to the county. The reserve to all these</p>	<p>statutory consultation focuses on issues of soundness and legal compliance of the document, therefore it was not appropriate to produce a summary version.</p> <p>All representations will be forwarded to the inspector for consideration.</p> <p>We do not consider there to be any contradictory statements regarding landfill use. Our calculations of landfill requirement over the lifetime of the Waste Core Strategy (see background documents "<i>Arisings and capacity</i>" and "<i>Landfill</i>") show that there is no capacity gap for landfill and therefore no requirement for locations for new landfill sites to be identified in the Waste Core Strategy. However, as policy WCS3 acknowledges, there may be cases where landfilling is still necessary. This policy sets out limited circumstances where landfill maybe allowed.</p> <p>The Waste Core Strategy has been developed in a number of stages, one of which was the Emerging Preferred Options report. The strategy was then developed and updated in response to consultation comments received and consulted on again as the First Draft Submission report. All comments received were taken into account and further development and refinement has resulted in the Publication Document (Regulation 27) consultation report.</p> <p>We note your comment, but consider that the policies contained within the Publication Document have been designed to achieve these aims. The issues you mention are set out on page 27 of the Publication Document as part of the vision. The objectives are set out on pages 32-33 and the policies which will contribute towards the delivery on these objectives are set out on table 4.</p> <p>Objective WO7 'To develop a waste management industry that contributes positively to the local economy' is contributed to by WCS4, WCS9, WCS12 and WCS13. Paragraphs 8.45 – 8.47 considers the deliverability of WO7.</p>
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		<p>may be true.</p> <p>Objectives of the Waste Core strategy "To REDUCE GREEN HOUSE EMISSIONS, SUSTAINABLE DEVELOPMENT AND DRIVE WASTE UP THE HIERARCHY."</p> <p>Carbon Emissions</p> <p>The WCS is peppered with reference to climate change and reducing carbon emissions. However the granting of planning permission for a mass burn "energy from waste" incinerator on Hartlebury Trading Estate, indicates that the county council is not serious about minimising carbon emissions. New facilities may not therefore mitigate the effects of climate change, and may increase them greatly.</p> <ul style="list-style-type: none"> <li>• Increased waste miles will add to the carbon footprint, (some waste will travel 70 miles.)</li> <li>• The geographical hierarchy appears to be inaccurate, with a facility sited in the north of 2 counties, instead of a location central to waste arisings.</li> </ul>	<p>The Waste Core Strategy is not technology specific.</p> <p>In line with the vision and WO3 the Waste Core Strategy seeks to promote the management of waste at the highest appropriate level of the waste hierarchy. This will be implemented in particular through policies WCS1, WCS2, WCS3 and WCS14.</p> <p>See response to 1665/7 in relation to the current application for an Energy from Waste facility at Hartlebury Trading Estate.</p> <p>The spatial strategy in the Waste Core Strategy is designed to aid a reduction in waste miles by guiding waste management development to zones with the highest levels of arisings or resource demand and Policy WCS6 also promotes the use of alternatives to road transport.</p> <p>The geographic hierarchy considers concentration of waste arisings, resource demand, onward treatment facilities, connections to the strategic transport network and potential for future development of waste management facilities. These factors have been used to identify broad areas, which are</p>
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		<ul style="list-style-type: none"> <li>• WCS appears not to be technology neutral, contrary to the claim that it is. Many parameters seem to fit around the proposed Hartlebury incinerator facility and site. Stack height and emissions are referred to, along with other site features eg. Within pages 36-40 and throughout the WCS.</li> </ul> <p>Energy recovery</p> <ul style="list-style-type: none"> <li>• Paragraph 3.20 refers to incineration without energy recovery. Why is this?</li> </ul> <ul style="list-style-type: none"> <li>• Autoclaving and Anaerobic Digestion, both cheaper methods of creating energy from waste and further up the waste hierarchy than burning, are not specifically included in the WCS. Autoclaving and especially Anaerobic Digestion could deal with the "in county" biodegradable waste, producing energy and useful by products</li> <li>• It is suggested that new developments may include AD facilities within their proximity. Thus demonstrating the flexibility and cost effectiveness of such facilities is recognised by the council. Yet for some reason not considered on a</li> </ul>	<p>illustrated on Figure 14. Figure 14 does not identify specific sites.</p> <p>The facilities shown in Figure 6 are existing sites and have been checked against records of planning permissions and Environment Agency records.</p> <p>The references to stack height and emissions in policy WCS2 reflect the findings of the Habitats Regulations Assessment (the HRA). As stated in paragraph 3.19, the limitations represent the findings of the HRA modelling assessment at a level which shows no likely significant effects on the Lyppard Grange Ponds Special Area of Conservation which is a European designated site.</p> <p>Paragraph 3.20 refers to incineration without energy recovery to clarify what is regarded as 'disposal' for the purposes of the Waste Core Strategy. Incineration <u>with</u> energy recovery would be classed as 'other recovery' in accordance with the Waste Framework Directive.</p> <p>The Waste Core Strategy is not technology specific and therefore inclusion or exclusion of any specific technology in the text carries no significance. Anaerobic Digestion is classed as recycling in the Waste Core Strategy (see Recycling in the Glossary on page 101). Autoclaving, if it recovered energy from the process, could be considered as 'other recovery'.</p>
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		<p>larger scale.</p> <ul style="list-style-type: none"> <li>• The cost of gate fees for various waste disposal methods is included in Fig 16 but incineration is not included in this table. AD is much cheaper than other options and yet is not being specifically considered. Failing to include all technologies, especially those that have already been chosen, lacks transparency and fails to demonstrate value for money for the tax payer.</li> <li>• Wychavon District Council does not consider incineration of waste to be renewable energy.</li> </ul>	<p>Figure 16 is reproduced from a regional study by Advantage West Midlands, "<i>Waste – Future Resource for Business</i>" (2008) The report does not include equivalent information for other treatment methods and this information is not readily available elsewhere. It is intended to indicate relative costs across various waste management options. Although we recognise that Incineration or Energy from Waste facilities are not shown in Figure 16, we do not have the information available to supplement this study, and as the figure is intended to be indicative and the Waste Core Strategy is not technology specific, this is not considered to be an issue of soundness.</p> <p>This issue is addressed explicitly in the report to Planning and Regulatory Committee – 1 March 2011, regarding the Energy from Waste application at Hartlebury Trading Estate (available on the council's website <a href="http://www.worcestershire.gov.uk/cms/environment-and-planning/planning-applications/energy-from-waste-facility.aspx">http://www.worcestershire.gov.uk/cms/environment-and-planning/planning-applications/energy-from-waste-facility.aspx</a>) part of which explains :</p> <p>"222.The proposed EnviRecover Facility would recover approximately 15.5 MW of electricity; approximately 2MW would be required to run the operations with 13.5MW exported to the national grid. The applicant states that 60% of the energy output would be classed as renewable energy, relating to the proportion of the waste treated at the facility that is classed as biomass, i.e. from a renewable source, such as wood and food waste. The Landfill Directive notes that up to 68% of household waste is biodegradable.</p> <p>223. It is appropriate to consider how much of the energy recovered by the EnviRecover Facility will be classified as <b>renewable energy</b>. Those wastes that are not classed as biomass (eg plastics from fossil fuels) will not contribute to renewable energy, unless high quality heat is exported from the</p>
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		<p>Waste Arisings</p> <ul style="list-style-type: none"> <li>• The waste hierarchy is being disregarded as a "saved policy". Failing to adhere to it is difficult to reconcile with the Worcestershire objective of sustainable development and driving waste up the hierarchy. So cannot be considered sound.</li> <li>• Autoclaving and Anaerobic Digestion could deal with the "in county" biodegradable waste, the only part of the waste which would attract the extra</li> </ul>	<p>plant. However, this proportion might be expected to change over time, as waste generation, separation and collection systems evolve. Further, EfW facilities that meet the rWFD efficiency threshold (as the proposed facility does) are recognised in policy as contributing to the supply of renewable energy sought.</p> <p>224. As such, the Director of Planning, Economy and Performance is satisfied that the energy recovered by the proposed EnviRecover Facility will make a useful contribution to the renewable energy supplies sought by national policy and the Worcestershire Climate Change Strategy 2009 and enable future targets to be met. Using waste as the fuel, the EnviRecover Facility will also contribute to achieving climate change emissions reduction targets, particularly reducing the generation of methane contrary to concerns raised by W.A.I.L. and local residents."</p> <p>See response to 1665/7 in relation to the current application for an Energy from Waste facility at Hartlebury Trading Estate.</p> <p>The Waste Hierarchy is set out in European directives and national policy. Previously this was included as a policy in the Worcestershire Structure Plan. The Structure Plan will, in part, be replaced by the policies in the Waste Core Strategy. Appendix 2 lists the Structure Plan 'saved' policies which will be superseded by the adoption of the Waste Core Strategy. The Waste Hierarchy is an integral part of the Waste Core Strategy. In line with the vision and WO3, the strategy seeks to promote the management of waste at the highest appropriate level of the waste hierarchy. This will be implemented in particular through policies WCS1, WCS2, WCS3 and WCS14.</p> <p>The Waste Core Strategy Publication document does not make specific reference to LATs. Landfill tax is mentioned in paragraph 8.47 as one of the drivers for making provision for the treatment rather than the disposal of waste. The Waste</p>
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		<p>landfill tax (LATS) when waste is sent to landfill. Yet this has not been made clear in the WCS and could mislead people into thinking the landfill tax would be paid on the total amount of waste ie 200.000 tonnes. When it will not be.</p> <ul style="list-style-type: none"> <li>• Paragraph 1.8, states that predicted waste arisings are based on the best available data. Waste is falling dramatically and consistently, recycling is only at half potential capacity, so it is difficult to understand the assumption that waste will increase so dramatically in the coming years. For a Waste Strategy to be considered "sound" it must arise from a sound evidence base, and as no sound evidence of an impending jump in arisings is offered, the proposed Strategy cannot be considered "sound" How accurate is the data?</li> <li>• Paragraph 2.47 states that "cross boundary movement of waste is normal for facilities to remain viable." Are local facilities importing waste to remain viable?</li> <li>• Paragraph 2.48 states that imports of county waste exceed exports. There is</li> </ul>	<p>Core Strategy is not technology specific and does not specify what these treatment options might be.</p> <p>However LATS are considered in the background document "Arisings and Capacity" and have informed the MSW targets set out in the Publication Document.</p> <p>Full details of the data options considered and used, as well as risk assessments for the approaches used, are contained in the background document "<i>Arisings and capacity</i>", available on our website <a href="http://www.worcestershire.gov.uk/wcs">www.worcestershire.gov.uk/wcs</a>. Although the most accurate data has been chosen as far as possible, a worst-case approach has been taken and therefore potentially overestimates the amount of waste arising over the period of the Waste Core Strategy. This is in order not to constrain development by underestimating the level of need.</p> <p>Waste is similar to any other commodity in that it is influenced by market forces and therefore waste movements across local</p>
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		<p>also a statement that there will be no limit on the export or import of waste.</p> <p>• Recycling of 70% or more can be achieved, yet Worcestershire as a county only recycles approximately half of this currently. This should be increased to the highest level possible before any long term technology specific commitment is made.</p> <p>The claims that an "Energy from Waste" incinerator is needed to deal with local waste, after all recyclable waste is removed seem at odds with the above points.</p> <p>Landfill</p> <p>The claim that no new landfill capacity</p>	<p>authority boundaries are inevitable. The Waste Core Strategy is concerned with all waste, including commercial and industrial waste, agricultural waste, construction and demolition waste, hazardous, clinical and radioactive waste, as well as municipal solid waste. Some wastes require specialist management. For instance, one of the county's waste management companies reprocesses waste to extract and recycle precious metals. The economies of scale for this type of process are such that it is not feasible for this to be managed at a local level and this particular facility performs a national function. The Waste Core Strategy is not able to impose barriers to the movement of waste. It employs the concept of 'equivalent self-sufficiency' to take account of this, thereby planning for facilities to manage the amount of waste equivalent to the county's arisings.</p> <p>The targets set in objective WO3 are to re-use, recycle or recover 75% of C&amp;I and C&amp;D waste and 78% of municipal waste. The options considered for setting targets for each of the waste streams are set out in the background document "<i>Arisings and capacity</i>", available on our website <a href="http://www.worcestershire.gov.uk/wcs">www.worcestershire.gov.uk/wcs</a>.</p> <p>A capacity gap has been identified for recycling, other recovery and disposals, however the Waste Core Strategy is not technology specific.</p> <p>In line with the vision and WO3 it seeks to promote the management of waste at the highest appropriate level of the waste hierarchy. This will be implemented in particular through policies WCS1, WCS2, WCS3 and WCS14.</p> <p>See response to 1665/7 in relation to the current application for an Energy from Waste facility at Hartlebury Trading Estate.</p> <p>Our calculations of landfill requirement over the lifetime of the Waste Core Strategy (see background documents "<i>Arisings and capacity</i>" and "<i>Landfill</i>") show that there is no capacity gap for</p>
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		<p>will be needed is at odds with POLICY WCS3 which states that there will be no more landfill EXCEPT FOR WHEN THERE IS WASTE WHICH CANNOT BE RECOVERED OR RECYCLED.</p> <ul style="list-style-type: none"> <li>• There is little or no viable market for incinerator bottom ash, so we fear that in spite of claims to the contrary, most of the 50.000 tonnes of ash produced per year will go to landfill, probably locally. Much more waste to landfill than if better recycling was in place, and biodegradable waste was treated with AD.</li> <li>• Local landfills have major and minor aquifers beneath them, there is great risk of contamination not just of surrounding land but of the water table, and drinking water, should any compounds leak into them or the ground.</li> <li>• There have already been major problems with land slippage and leachate contamination with these landfills.</li> </ul> <p>EXTENDING EXISTING SEWERS</p> <ul style="list-style-type: none"> <li>• Are there plans to extending the sewers on Hartlebury Trading estate, which are</li> </ul>	<p>landfill and therefore no requirement for locations for new landfill sites to be identified in the Waste Core Strategy. This is based on current landfilling levels and projections set out in the background documents "<i>Arisings and capacity</i>" and "<i>Landfill</i>". Policy WCS3 sets out circumstances where landfill may be allowed, these are where re-use, recycling and energy recovery are not practicable for the type of waste to be managed, where there is a shortfall in disposal capacity or where the proposal is essential for operational or safety reasons. It also sets the tests which must be met to allow new landfill sites to be developed.</p> <p>Policy WCS2 part a iii and paragraph 3.15 require any residues from 'other recovery' facilities to be satisfactorily managed and disposed of.</p> <p>See response to 1665/7 in relation to the current application for an Energy from Waste facility at Hartlebury Trading Estate.</p> <p>Policy WCS8 considers the potential impacts from any waste management facility on water resources. The Environment Agency is the pollution control authority responsible for issuing environmental permits for landfill sites. They will be consulted on all planning proposals for waste management facilities.</p> <p>Policy WCS9 part e considers land stability and subsidence. Also see above.</p> <p>See response to 1665/7 in relation to the current application for an Energy from Waste facility at Hartlebury Trading Estate.</p>
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		<p>already at capacity, to take contaminated water from the cooling process of an incinerator? How will this water be discharged? How much will there be?</p> <ul style="list-style-type: none"> <li>• Are the county council aware of all previous and existing problems pertaining to contaminated water and lechate, are they also aware of the high grade farming land surrounding the site?</li> </ul> <p>Landfill mining</p> <ul style="list-style-type: none"> <li>• Paragraph 3.26 suggests the mining of historical landfills. Given major past problems with slippage, and thousands of gallons of leachate being taken away in tankers, and also given that those problems took over 2 years to be resolved with little satisfaction, we understand that this activity is not being suggested with our locality in mind. We would also have great concerns should this practice be entertained elsewhere. It would be completely unacceptable.</li> <li>• Methane is currently being extracted and fed to the national grid thus creating energy. We could not accept disturbance of this, thus creating further slippage, and all that is entailed.</li> <li>• Mining landfills indicates an anticipated lack of waste, and the need to dispose of large amounts of un-usable incinerator ash. Why is this?</li> </ul>	<p>Paragraph 3.26 makes reference to potential future 'landfill mining' proposals. This refers to the potential for materials such as metals to be recovered from historic landfills. It does not indicate an 'anticipated lack of waste' and at present such proposals seem unlikely. The council is aware of the potential hazards such a proposal could bring, and paragraph 3.26 makes clear that the Environment Agency would need to be consulted about any landfill mining proposal.</p>
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		<ul style="list-style-type: none"> <li>• Reference is also made to land filling on land. We are very concerned that there are plans to create an ash mountain, when there is no more landfill capacity.</li> </ul> <p>Green belt</p> <p>The Waste Core strategy seems to be make selective provision for protection of the Green Belt, offering no protection to the local area or amenity.</p> <ul style="list-style-type: none"> <li>• Paragraph 2.10 states that ONLY 1% OF the West Midlands is Grade 1 agricultural land quality, mostly in Herefordshire and Worcestershire. Much of the land around Elmley Lovett is high grade 1 and 2 agricultural land. Farming is a predominant feature of the area.</li> <li>• Livestock is farmed, as well as high grade, high intensity arable farming.</li> <li>• There are concerns that any dioxins, of which there are no safe limits, and extra traffic pollutants, will be detrimental to the crops and livestock and therefore be detrimental to the local economy. Pollutants can enter the body through ingestion of food.</li> <li>• Perception alone could be economically detrimental to local farms, and therefore the local economy.</li> </ul>	<p>The reference in paragraph 3.20 to the deposit of waste on land is intended to clarify that landraising proposals would be covered by policy WCS3. Landraising is a relatively common practice, for example to improve agricultural land by filling a hollow which impedes working the land, and also as a form of landfill, for example the existing landfill facility at Hill and Moor.</p> <p>Policy WCS10 protects the Green Belt in line with national policy. Policy WCS 11 protects amenity from unacceptable adverse impacts from any type of waste management development.</p> <p>Minor amendments are proposed to make more explicit reference to 'very special circumstances' as set out in national policy (see response to 1679/49g).</p> <p>The Environment Agency is the pollution control authority responsible for issuing environmental permits for waste management facilities. They will be consulted on all planning proposals for waste management facilities. Policy WCS11 considers potential impacts on air quality, fumes, dust, odours and bioaerosols.</p>
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		<ul style="list-style-type: none"> <li>• There is great concern that the fragile bio diverse area which is being successfully maintained and enhanced by local farmers will be adversely affected by many aspects of the development of an incinerator in the close proximity. It would seem that this has not been taken into account in the WCS.</li> <li>• Sustainability should also refer to the local production of good quality food. The WCS seems to also over look this very important point.</li> </ul> <p>Noise mitigation</p> <ul style="list-style-type: none"> <li>• Paragraph 3.24, again seems to have been written with the Hartlebury incinerator in mind. With reference to the normal excavation of large amounts of soil during the construction process.</li> <li>• Reference is made to the construction of bunds, embankments, and features for noise attenuation and landscaping for noise mounds.</li> <li>• This is clearly recognition that the incinerator will have a noise impact on the surrounding area. This will not protect amenity, and will adversely affect private property also.</li> </ul> <p>Consultation</p> <ul style="list-style-type: none"> <li>• This has been poor in the locality with little public engagement, and no public meetings held by the local authority to</li> </ul>	<p>Policy WCS7 protects environmental assets, including designated sites, species, habitats and heritage assets. Policy WCS10 considers local landscape character.</p> <p>See above for a response to your previous points. Other agricultural issues are outside of the remit of the Waste Core Strategy.</p> <p>Excavation is a normal part of the construction process in creating foundations for buildings and this paragraph is included to ensure that consideration is given to the appropriate re-use or disposal of this material from all types of development, including the building of homes, shops, offices and industrial facilities.</p> <p>The reference to the construction of bunds, embankments or features for noise attenuation is not an expectation of noise impact (noise impacts are covered by policy WCS11) but rather to indicate that these types of features will be considered against policy WCS3 as a form of landfill and disposal.</p> <p>See response to 1665/7 in relation to the current application for an Energy from Waste facility at Hartlebury Trading Estate.</p> <p>The Waste Core Strategy has been subject to several previous stages of consultation. Each stage of development of the Waste Core Strategy has been advertised on the council's consultation portal, in the county's newspapers and all parish, town, city,</p>
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		<p>discuss alternatives to waste management at an early stage, or indeed at any stage. We do not accept that community views have shaped the WCS</p> <p>It is regret that for all of the concerns raised we conclude that the Waste Core Strategy proposed by Worcestershire County Council is not sound.</p>	<p>borough and district councils have been consulted, as well as everyone who requested to be included on the Waste Core Strategy consultation database.</p> <p>Parish councils were advised in advance of the start of the Publication Document (Regulation 27) consultation to enable them to incorporate the consultation into their meeting schedules. All comments received in response to previous rounds of consultation have been considered and our response to those comments published on our website.</p> <p>At each stage of consultation the Council has published response documents outlining how comment will be taken into account and has received positive feedback from several stakeholders regarding the way in which the development of the Waste Core Strategy has responded to these consultation comments.</p>
<p><b>L565/91</b></p> <p>Mr J Prior</p> <p>Earls Croome Parish Council</p>	<p><b>Part:</b> Not specified</p> <p><b>Legally compliant:</b> Yes</p> <p><b>Sound:</b> Yes</p> <p><b>Wish to participate at EiP:</b> Not specified</p>	No comments	<p><b>No changes proposed.</b></p> <p>Support noted.</p>
<p><b>L1765/92a</b></p> <p>Mr C Robinson</p> <p>BNP Paribas Real Estate</p>	<p><b>Part:</b> WCS1, WCS2</p> <p><b>Legally compliant:</b> Yes</p> <p><b>Sound:</b> No</p> <p><b>Reason:</b> not consistent</p> <p><b>Wish to</b></p>	<p>It is considered that the DPD is unsound in respect of policies WCS1 and WCS2 for identical reasons - hence the reason why there is one representation in respect of both policies. These policies relate to what is probably the area of greatest growth and demand in respect of new facilities (on the basis that landfill needs to be reduced drastically).</p>	<p><b>No changes proposed.</b></p> <p>Policies WCS1 and WCS2 implement the spatial strategy and guide the development of re-use, recycling and recovery facilities. The spatial strategy and the zones of the geographic hierarchy have been developed to take into account the concentration of waste arisings, resource demand, onward treatment facilities, connections to the strategic transport network, anticipated future development and constraints to and</p>

	<b>participate at</b> <b>EiP:</b> Not specified	Facilities for re-use and recycling/other recovery will be urgently required if targets in terms of reducing (and eventually eliminating) landfill are to be achieved. However, it is not just sufficient to provide additional facilities and it is clear that the principle of achieving a sustainable pattern of development will require appropriate facilities for waste management close to the point of origin and need in order to achieve sustainable patterns of development. We are concerned that the imposition of requirements to simply achieve the higher level locations may not be consistent with the principle of sustainability and proximity to the point of origin/need. Accordingly, it is proposed that this limit is removed and the policy amended to reflect national advice/guidance in terms of ensuring that locations are sustainable in their widest sense - which includes proximity to point of origin and need as well as encouraging, where appropriate, agglomerations of complimentary facilities.	potential for future development of waste management facilities.  However, the policies are designed to guide facilities to the highest <u>appropriate</u> level of the geographic hierarchy, and where proximity to a source of waste arisings or co-location with other facilities are important factors, these can be used as part of the justification for locating a facility in a lower-level zone, (see paragraph 3.8 of the Publication Document).  The waste management industry operates in the free market and reflects the normal working of the economy, with source and destination of waste not being fixed. It is therefore not practical to include specific policies on proximity or waste miles.
<b>L1765/92b</b> Mr C Robinson BNP Paribas Real Estate	<b>Part:</b> WCS4, Table 4  <b>Legally</b> <b>compliant:</b> Yes  <b>Sound:</b> No  <b>Reason:</b> not effective, not	Greenfield and Greenbelt land must not be ruled out for new use of recycling and other recovery facilities national guidance confirms that such locations may be more sustainable than other landfill sites. Achieving sustainable patterns of development is encouraged by Section 5 of the Worcestershire Waste Core Strategy and, therefore, it is not	<b>No changes proposed.</b>  Greenfield and Greenbelt are separate issues and are addressed separately in the Waste Core Strategy Publication Document. Policy WCS4 refers to Greenfield land. Table 5 in Policy WCS4 is based on the compatible land types set out in the West Midlands RSS (Phase 2 revision proposed policy W5). In line with the RSS and PPS7 this policy discourages development on greenfield land and directs it towards other land

	<p>consistent</p> <p><b>Wish to participate at EiP:</b> Not specified</p>	<p>considered that policy WCS4, as drafted, is consistent with national advice or even that set out within the Worcestershire Waste Core Strategy. It is accepted that for, Greenfield and/or Greenbelt locations to be acceptable there would have to be a clear and justifiable case made but such locations should not be excluded simply by location/use. Accordingly, it is recommended Table 4 is amended to show that enclosed "re-use and recycling/other recovery "facilities may be permissible on Greenfield land "where strongly justified".</p>	<p>types indicated in the table.</p> <p>Minor amendments are proposed to WCS10 to make more explicit reference to 'very special circumstances' in the Green Belt as set out in national policy (see response to <b>1679/49g</b>). Paragraphs 5.44 and 5.45 set out explanatory text relating to Green Belt in order to make it clear that some developments in Green Belt may be permitted.</p>
<p><b>L1765/92c</b></p> <p>Mr C Robinson</p> <p>BNP Paribas</p> <p>Real Estate</p>	<p><b>Part:</b> 8.42</p> <p><b>Legally compliant:</b> Not specified</p> <p><b>Sound:</b> Not specified (but ticked not effective and not consistent with national policy)</p> <p><b>Wish to participate at EiP:</b> Not specified</p>	<p>Paragraph 8.42 recognises the benefits of co-location but this should be extended to relate not just to existing facilities but also make clear that new facilities should be encouraged to co-locate wherever possible and appropriate.</p>	<p><b>No changes proposed.</b></p> <p>Paragraph 8.42 is part of a section concerned with identifying whether adequate land is available, and one category of land considered is for co-location opportunities on sites with current use rights for waste management purposes. We agree that encouraging co-location of new facilities could be beneficial and support this in policy WCS4.</p> <p>Policy WCS4 identifies co-location with producers or end users of waste as a compatible land use where operationally related (with the exception of landfill). Examples of such operational relationships are set out in Table 6.</p>
<p><b>L1765/92d</b></p> <p>Mr C Robinson</p> <p>BNP Paribas</p> <p>Real Estate</p>	<p><b>Part:</b> Appendix A</p> <p><b>Legally compliant:</b> Yes</p> <p><b>Sound:</b> Yes</p> <p><b>Wish to</b></p>	<p>It is acknowledged that Appendix A supports Stonebridge Cross Business Park as a potential location for new waste recovery and management facilities. This is supported as it considered that the location is ideal to the</p>	<p><b>No changes proposed.</b></p> <p>Support noted.</p>

	<p><b>participate at</b>  <b>EiP:</b> Not specified</p>	<p>needs of Droitwich and surrounding areas, including Bromsgrove and also potentially larger scale facilities which offer greater economies of scale and which could meet cross border needs. The benefits of this location are that it lies close to both industrial and residential areas. It also offers the potential for waste recycling and other recovery facilities with excellent access to local and wider points of origin without any impact upon residential amenity. Accordingly the acknowledgment of the benefit of this location is welcomed.</p>	
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# Appendix 1: Correspondence with Northamptonshire County Council

Mr Mark Chant  
Head of Planning Services  
Planning Services  
PO Box 163  
County Hall  
Northampton  
NN1 1AX

13th April 2011  
Our ref: SP 8010.11  
Ask for: Nicholas Dean

Dear Mr Chant,

## **Worcestershire Waste Core Strategy Development Plan Document: Publication document (Regulation 27 consultation)**

Thank you for your response to the Waste Core Strategy Publication Document  
**(Regulation 27) consultation.**

Your comments have been duly recorded on our consultation database and will be forwarded to the Secretary of State when we submit the Waste Core Strategy for examination.

I note that your comments relate to the provision for hazardous waste management capacity and would like to take this opportunity to clarify our position and to invite you to meet with us to discuss any concerns you have.

The Waste Core Strategy does not include site specific allocations or proposals relating to specific waste streams, instead it sets out criteria based policies and:

***"It provides for all the following kinds of Directive Waste produced in, or imported into, Worcestershire:***

- ***Commercial and Industrial (C&I) Waste***
- ***Construction and Demolition (C&D) Waste***
- ***Municipal Solid Waste (MSW)***
- ***Hazardous Waste, and***
- ***Waste Water***

***All policies will apply equally to all of these waste streams." (Para 1.9)***

Note; The document states that Hazardous waste includes clinical and radioactive waste.

Objective 5 of the Waste Core Strategy is "to enable equivalent self-sufficiency in Waste Management in the County by addressing the "Capacity Gap" over the plan period..." This applies to all waste streams and hazardous waste capacity and projected arisings have been taken into account in calculating the capacity gap.

The concept of equivalent self-sufficiency allows us to plan for the management of all the volumes and all the types of waste produced in Worcestershire whilst allowing flexibility for cross-boundary movements that will inevitably occur. These movements vary annually; for example the Environment Agency Hazardous Waste Data Interrogator shows that in 2008 approximately 25 tonnes of hazardous waste arising in Worcestershire was exported to Northamptonshire and approximately 1000 tonnes was exported from Northamptonshire to

**Nicholas Dean**  
Minerals and Waste  
Team Leader  
Planning, Economy  
and Performance

County Hall  
Spetchley Road  
Worcester  
WR5 2NP

Worcestershire. In 2009 this varied to approximately 200 tonnes and approximately 1,200 tonnes respectively.

However the principle behind our approach remains the same: hazardous waste arises in Worcestershire and regardless of where it is treated or disposed of we plan to manage at least an equivalent volume within the county itself. Hazardous waste also moves through the county via waste transfer stations and we plan to enable this to continue. We identify a shortfall in existing provision to treat (but not to transfer or dispose of), a "capacity gap" and address it in the same way as we do other waste streams.

The evidence which we have used to calculate the 'capacity gap', along with any assumptions made and the alternatives considered are set out in the background document "Arising and Capacity." I attach a simple summary but more detail is available on the website [www.worcestershire.gov.uk/wcs](http://www.worcestershire.gov.uk/wcs).

In practice Hazardous waste arising from Worcestershire have decreased over the previous 3 years<sup>1</sup>,

2007: 68,402.46t

2008: 46,464.35t

2009: 33,119.42t

However in order to ensure that we give adequate consideration to hazardous waste arisings we have based the Publication Document on much higher projections of **72,379tpa**, as set out in the evidence base for Proposed Phase 2 Revision to West Midlands Regional Spatial Strategy.

As you will note from Worcestershire Waste Core Strategy Publication Document Appendix 4: Capacity Gap the following capacity has therefore been identified for hazardous waste by 2025/6.

	Tonnes per annum
Re-use and recycling capacity gap	40,500
'Other recovery' capacity gap	6,500
Sorting and transfer capacity gap	0
Disposal and landfill capacity gap	0

This has been incorporated into the calculations of land requirements (31 ha total by 2025/26) also set out in Appendix 4: Capacity Gap. In this respect the approach taken to the management of hazardous waste is consistent with that taken to all other major waste streams.

I hope this goes some way towards clarifying our position i.e. to achieve equivalent self-sufficiency for all main waste streams including hazardous waste.

I know that you will understand that I would like to try to resolve as many outstanding issues as possible before the Examination. It would be very helpful if you could reconsider your response in the light of this letter. If not I would be grateful if you could suggest some dates to arrange a meeting to discuss your concerns further. I look forward to hearing from you.

Yours sincerely

**Nicholas Dean**

Tel: 01905 766374

Email: [wcs@worcestershire.gov.uk](mailto:wcs@worcestershire.gov.uk)

<sup>1</sup> Data sourced from hazardous waste data interrogator 2007, 2008 and 2009 using the following selections: arose in planning region 'West Midlands' and sub-region 'Worcestershire', all waste types and recovery methods, reporting arisings by region, show disposal or recovery method as columns and show movements for all consignments. (Table 17 "Arising and Capacity background document.)

Mr Mark Chant  
Head of Planning Services  
Planning Services  
PO Box 163  
County Hall  
Northampton  
NN1 1AX

14<sup>th</sup> June 2011

Our ref: SP 8010.11  
Ask for: Nicholas Dean

Dear Mr Chant,

**Worcestershire Waste Core Strategy Development Plan Document: Publication document  
(Regulation 27 consultation)**

Further to my letter of 13<sup>th</sup> April 2011 regarding your response to the **Waste Core Strategy Publication Document (Regulation 27) consultation** and my follow up email of 13<sup>th</sup> May to [Planning@northamptonshire.gov.uk](mailto:Planning@northamptonshire.gov.uk) I am concerned not to have heard from you. As I stated in my original letter, I know that you will understand that I would like to try to resolve as many outstanding issues as possible before the Examination. The Environment Agency have been specifically consulted on our approach to hazardous waste generally, the specific policies in the Waste Core Strategy and the background paper "Hazardous Waste" listed in the background papers to the Waste Core Strategy on our website [www.worcestershire.gov.uk/wcs](http://www.worcestershire.gov.uk/wcs) and commented in their formal consultation response that their concerns have been addressed in the Waste Core Strategy Publication (Regulation 27) document and the Hazardous Waste background paper and that they consider our approach sound.

Please contact Ruth Clare at:  
Environment Agency  
Newtown Industrial Estate  
Northway Lane  
Tewkesbury  
Glos  
GL20 8J8

If you would like to discuss this matter further with them.

I hope that my letter of 13<sup>th</sup> April and the attached information have also met your concerns. It would be very helpful if you could reconsider your response in the light of this letter. If not I would be grateful if you could suggest some dates to arrange a meeting to discuss your concerns further. I look forward to hearing from you.

I enclose a copy of my original letter and the email follow up for your information.

Yours sincerely

**Nicholas Dean**  
Tel: 01905 766374  
Email: [wcs@worcestershire.gov.uk](mailto:wcs@worcestershire.gov.uk)

# Appendix 2: Correspondence with Upton Town Council

Mr S Yates  
Deputy Mayor  
21 New Street  
Upton upon Severn  
Worcs  
WR8 0HP

21st April 2011  
Our ref: SP 8010.11  
Ask for: Nicholas Dean

Dear Mr Yates

**Worcestershire Waste Core Strategy Development Plan Document:  
Publication document (Regulation 27 consultation)**

Thank you for your response to the Waste Core Strategy Publication Document (Regulation 27) consultation.

Your comments have been duly recorded on our consultation database and will be forwarded to the Secretary of State when we submit the Waste Core Strategy for examination.

I note that your comments relate to the provision of waste facilities on existing industrial estates and would like to take this opportunity to clarify our position and to invite you to meet with us to discuss any concerns you have.

I am concerned that you may have misread the reference to industrial estates in Upton upon Severn. I think that your comments relate to the Upton upon Severn Industrial Estate off Rectory Road. I enclose a plan with the site shown in pink (please ignore the Backfields area on the plan, we have never considered this site as a potential area of search, the plan is from a web search of all industrial estates in Upton.) Although earlier drafts of the strategy did refer to the Upton upon Severn Industrial Estate we have now deleted this site from our list of "Areas of Search" at least partly because it is in the Flood Plain. The current consultation, the Waste Core Strategy Publication document no longer includes this site. The list of "Areas of Search" we now propose (figure 19, page 117) only includes the Upton Business Centre, Welland Road QWR8 0SW as a possible area of search for new waste management facilities the Upton upon Severn area. I enclose a print out of Upton upon Severn Business Centres showing an aerial photo of the site for your information.

**Nicholas Dean**  
Minerals and Waste  
Team Leader  
Planning, Economy  
and Performance

County Hall  
Spetchley Road  
Worcester  
WR5 2NP

The inclusion of sites like the Upton Business Centre does not mean that new waste facilities will be developed there, only that in principle the site appears to be suitable. Any specific proposal would have to be assessed against all the other policies in the strategy before planning permission could be granted. In the same way the exclusion of the Upton upon Severn Industrial Estate does not mean that planning permission for a waste management facility would always be refused, only that in principle the site does not appear to be suitable. Any proposal would have to demonstrate that it was and would also be assessed against all the policies in the plan. Amongst other things those policies are intended to prevent unsuitable development in the flood plain, to prevent pollution harming watercourses, to protect the amenities of local people and to protect important assets, such

as the Cemetery and Chapel of Rest and the qualities e.g. of peace and quiet contemplation which are fundamental to them.

I hope this goes some way towards clarifying our position and will reassure you that the Waste Core Strategy does not refer to, or contain any proposals for the Upton upon Severn Industrial Estate.

I would like to try to resolve as many issues of concern that the public might have before the Examination. It would be very helpful if you could reconsider your response in the light of this letter. If not I would be grateful if you could suggest some dates to arrange a meeting to discuss your concerns further. I look forward to hearing from you.

Yours sincerely

**Nicholas Dean**

Tel: 01905 766374

Email: [wcs@worcestershire.gov.uk](mailto:wcs@worcestershire.gov.uk)

Mr S Yates  
Deputy Mayor  
21 New Street  
Upton upon Severn  
Worcs  
WR8 0HP

14<sup>th</sup> June 2011  
Our ref: SP 8010.11  
Ask for: Nicholas Dean

Dear Mr Yates

**Worcestershire Waste Core Strategy Development Plan Document: Publication document  
(Regulation 27 consultation)**

You may remember that I wrote to you on 21<sup>st</sup> April 2011 regarding your response to the Waste Core Strategy Publication Document (Regulation 27) consultation. I enclose a copy for your information.

I hope that that letter clarifies our position and re assures you that the Waste Core Strategy does not refer to, or contain any proposals for the *Upton upon Severn Industrial Estate* and protects important assets, such as the Cemetery and Chapel of Rest and the qualities e.g. of peace and quiet contemplation which are fundamental to them.

I would like to try to resolve as many issues of concern that the public might have before the Examination. It would be very helpful if you could reconsider your response in the light of this letter and could confirm that your concerns have now been met. If not I would be grateful if you could suggest some dates to arrange a meeting to discuss your concerns further. I look forward to hearing from you.

Please contact me if you would like any further information.  
Yours sincerely

**Nicholas Dean**  
Tel: 01905 766374  
Email: [wcs@worcestershire.gov.uk](mailto:wcs@worcestershire.gov.uk)



# Appendix 3: Correspondence with British Waterways

'Christine.Hemming@britishwaterways.co.uk'  
Sent: Thu 28/04/2011 15:39

Dear Christine,

## **Worcestershire Waste Core Strategy Development Plan Document: Publication document (Regulation 27 consultation)**

Thank you for your response to the **Waste Core Strategy Publication Document (Regulation 27) consultation**.

Your comments have been duly recorded on our consultation database and will be forwarded to the Secretary of State when we submit the Waste Core Strategy for examination.

Where possible I would like to resolve any outstanding issues prior to the examination and submit suggested changes to the Inspector for consideration. Below I suggest changes that I hope will address your concerns, however if these do not adequately address the issues you raised I would welcome a meeting to discuss them further.

In order to address your concerns regarding paragraph 2.16 I will be happy to suggest the following changes:

*"2.16 The canal network is extensive and connects to systems to the north, south and east of the County. Worcester (Worcester & Birmingham canal) and Stourport (Staffordshire & Worcestershire Canal) are placed on the river and canal network and the Droitwich Canals have recently undergone restoration to link to the River Severn and the Worcester & Birmingham Canal. There are however some limitations on vessel size due to the locks on or between the canals. **Though there is and there is** little likelihood of increased freight traffic on the county's canals in the foreseeable future, **there is more potential for the use of the River Severn**. The Waste Core Strategy encourages the consideration of freight transport by water where possible, but recognises that potential is limited."*

Please can you let know whether, in your opinion, this change would make the Waste Core Strategy sound and legally compliant. If this is not the case, or you would prefer different wording please feel free to suggest any changes.

I note your support for paragraph 4.10 and do not propose any changes to this paragraph at this point. I will however contact you should any other consultees raise concerns in relation to this section.

I have considered the comments you made in relation to the management of dredging or canal excavation material and believe that the proposed policy framework is adequate to assess proposals for facilities that manage dredging or canal excavation material should they come forward. Please can you confirm that you are in agreement with this, or alternatively suggest any changes you think necessary.

I look forward to hearing from you and would happy to arrange a meeting to discuss you concerns further if you would find this useful.

Yours sincerely

**Nicholas Dean**

Tel: 01905 766374

Email: [wcs@worcestershire.gov.uk](mailto:wcs@worcestershire.gov.uk)

---

**Sent:** 24 May 2011 14:45

**To:** 'christine.hemming@britishwaterways.co.uk'

Dear Christine,

We sent you the email below on 28<sup>th</sup> April with suggested changes following your response to the Waste Core Strategy Publication Document (Regulation 27) consultation. We have not yet heard from you to confirm whether you are in agreement with the proposed changes.

We would be grateful if you could reply by 3<sup>rd</sup> June, and we would be happy to arrange a meeting to discuss your concerns further if you would find this useful.

Kind regards

**Nicholas Dean**

Tel: 01905 766374

Email: [wcs@worcestershire.gov.uk](mailto:wcs@worcestershire.gov.uk)

---

**From:** Christine Hemming [mailto:Christine.Hemming@britishwaterways.co.uk]

**Sent:** 24 May 2011 15:52

**To:** WCS (PEP)

**Subject:** RE: Worcestershire Waste Core Strategy Development Plan Document: Publication document (Regulation 27 consultation)

Sorry Nicolas

I agree your wording and raise no further objection.

Kind regards

Chris

Christine Hemming BSc (Hons) MRTPI MInstLM

---

**Area Planner, Midlands and Wales (Central Shires and Wales)**

**Cynlluniwr Ardal, Canolbarth Lloegr a Chymru (Siroedd Canolbarth Lloegr a Chymru)**

**Fazeley Office**

T. 01827252 026

M. 07956 985644

# Appendix 4: Correspondence with Entec on behalf of National Grid

**From:** WCS (PEP)  
**Sent:** 03 May 2011 11:05  
**To:** damien.holdstock@entecuk.co.uk  
**Subject:** RE: National Grid: Worcestershire Waste Core Strategy Publication

Dear Damien

Thank you for your response, a formal acknowledgement will follow.

I attach an earlier comment from one of your predecessors for your information.

The central idea behind the current consultation is that it is the version we intend to submit to the Secretary of State. Whilst your comments will be reported to the Inspector for the Examination of the Strategy, they are very general and we are aware of them, there is still just time if you wished to submit any more specific comments.

Yours sincerely

Nick Dean

**From:** WCS (PEP)  
**Sent:** 04 May 2011 11:07  
**To:** damien.holdstock@entecuk.co.uk  
**Subject:** RE: National Grid: Worcestershire Waste Core Strategy Publication

Dear Damien

Thanks, we don't intend to produce a site specific DPD, but the Inspector could of course direct us to. If that happens, you are on our consultation list and will be consulted throughout. We will of course be happy to meet you at any time.

Yours sincerely

Nick Dean

# Appendix 5: Correspondence with Mr A Jones

Mr A Jones

12 May 2011

Our ref: SP8010.11 (1653/30)

Ask for: Nicholas Dean

Dear Mr Jones

Firstly, please accept my apologies for the delay in responding individually to your letter, although you should have received a standard acknowledgment letter. I am sure you can appreciate that we have had to prioritise collating and recording the responses to the Waste Core Strategy Publication Document (Regulation 27) consultation.

With regard to your letter of 1<sup>st</sup> November 2010, this was recorded as a response to the Waste Core Strategy First Draft Submission consultation and given reference number WR7-1653. We then sent you a letter dated 21<sup>st</sup> December 2010 to inform you that a *Consultation Response Document* and a summary of that document were available online or on request. I enclose a copy of that letter.

The points which you raised in your letter of 1<sup>st</sup> November 2010 were considered in the *Consultation Response Document*. For your convenience, I have reproduced below your points and our responses to them, as they were contained within the *Consultation Response Document*:

Reference	Name/ Organisation	Summary of comments	Initial officer response
WR7-1653 & WR9(also PQ24) - 1645 & WR21- 1664	Mr A Jones & Mrs L Brookes & Mr and Mrs C Greatbatch	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:  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.  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.  WO3: The concept of incineration is totally at the opposite end of the scale	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.  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.

Reference	Name/ Organisation	Summary of comments	Initial officer response
		<p>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 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>	

I hope this satisfies your request for our response to your original letter of 1<sup>st</sup> November 2010.

With regard to your representations to the Publication Document (Regulation 27) consultation, a copy of your representation and a summary of all responses received will be forwarded to the Secretary of State when we submit the Waste Core Strategy for examination. It is anticipated that

this will be in July 2011. Your comments will also be made available at libraries, hub customer contact centres and on our website [www.worcestershire.gov.uk/wcs](http://www.worcestershire.gov.uk/wcs).

The Secretary of State will appoint an Inspector to examine the 'soundness' of the Waste Core Strategy. The Inspector will take account of any comments made on this consultation and will then choose which matters to discuss and who to invite to participate in the examination.

As requested in the standard acknowledgement letter, please could you contact me on 01905 766374 or at [wcs@worcestershire.gov.uk](mailto:wcs@worcestershire.gov.uk) or by letter to the above address to say if, in principle, you would, or would not, like to speak at the Examination. This does not commit you but will help the Inspector to decide who he invites.

Full details of the examination will be sent to you once the document has been submitted to the Secretary of State.

Please contact me if you need any further information.

Yours faithfully

**Nicholas Dean**

Tel: 01905 766374

Email: [wcs@worcestershire.gov.uk](mailto:wcs@worcestershire.gov.uk)

# Appendix 6: Correspondence with Ms K Dowty

Mrs K Dowty

18 May 2011

Our ref: ND/HLB

Dear Mrs Dowty

## **Worcestershire Waste Core Strategy**

I am writing to respond to points 1 and 2 in your email of 4<sup>th</sup> May 2011 regarding the above; I hope that you will agree that the following summarises your complaint:

**Point 1-** The strategy is too long and without any summary.

**Point 2 -**

- a) That in order to comment on the document it is necessary to read the majority of the background documents; that these are long and technical;
- b) None of these documents are cross referenced to the strategy document or summarised,
- c) That this is above the level of understanding of the general public.
- d) That the consultation is not representative of the residents of Worcestershire.
- e) That the Core Strategy should have been taken on roadshows and Village Halls and published in newspapers and
- f) Individuals cannot comment on the "legality" or "soundness" of the document without a knowledge of the legislation.

I hope that the following answers your concerns. If it does not please come back to me and I will try to address them more fully. If you are not happy with the answers however the Council has a complaints procedure which you can pursue further; details are on the bottom left of the Council's homepage on its website.

I attach a print out for your information.

## **Point 1**

I agree that the document is long but we have reduced it as much as possible. We were concerned that if it were any shorter we would risk glossing over important details which the public ought to be able to read. If the Inspector finds it too long after the examination he can direct us how and where to reduce it. Other Waste Core Strategies are of comparable length. Gloucestershire County Council's is 191 pages long.

Because the Strategy will be part of the Development Plan, all of it will be relevant when determining planning proposals. A summary would risk confusing the issues by over simplifying details within

the main document, I am not aware of any Core Strategy Publication document where one has been prepared.

2a) The Strategy is a freestanding document and comments were invited on it as such. Unfortunately the issues are very complex. The Government requires us to provide a detailed evidence base in order to justify the proposals. It is not possible for us to prepare the strategy without this level of detail.

This scale of material is unusual. Wyre Forest District Council's Core Strategy, which was found sound, admittedly covered a wider range of subjects than the Waste Core Strategy but submitted 47 documents in its Evidence Base and another 12 in its Preparation History Published Documents. The Planning system is a complex one, subject to legal challenge at every point; unless assertions and proposals can be demonstrated clearly Core Strategies will not be found sound by the Inspectorate and will be open to Judicial Review. This is the Council's second attempt to produce a Waste Core Strategy; the first was withdrawn in 2007 on the advice of the Planning Inspectorate that, amongst other things, there was insufficient evidence to justify the Strategy.

2b) I do not agree that many of the documents are not cross referenced; the Core Strategy contains numerous footnotes referring to individual background documents. It is also not true that the documents do not contain summaries; all of the following do:

- Arisings and capacity
- Links to Districts and neighbouring Local Authorities' plans and strategies
- Agricultural Waste
- Hazardous Waste
- Clinical and radioactive waste
- Landfill
- Resource recovery from Biodegradable Waste, and
- Waste water treatment infrastructure

The others do not because we felt that the nature of the contents did not lend themselves to summary.

All of the previous consultation stages have included summaries as have the reports of the successive consultations.

2c) It is very difficult to get the level of understanding required right. The entire process is directed at a wide range of people from businesses generally and those involved in waste in particular, to statutory national and local specialist bodies, adjoining local authorities, Parish Councils and the general public. We started the process in 2008 with very general reports to make it as easy as possible for laymen to engage. We have supplemented these with background documents to enable the layman to explain particular subjects and how we addressed them, notably;

- Types of facility
- Metal recycling
- Waste transfer stations
- Recovering energy from waste
- Municipal waste
- Commercial and Industrial waste
- Construction and Demolition waste
- Agricultural waste
- Hazardous waste
- Clinical and Radioactive waste
- Landfill
- Resource recovery from Biodegradable waste, and



- Waste water treatment infrastructure

I am not aware of any other way we could have deal with these subjects, no other Councils have done anything very different. I agree that collectively they represent a lot of material but the alternative is to risk concealing our assumptions and the alternatives we considered.

2d) I agree that getting a representative consultation list is difficult. We have refined ours from the initial list developed as part of the Council's Statement of Community Involvement (SCI) in 2006. The SCI was subject to Examination by an Inspector and found sound. It is therefore in accordance with government policy. The initial list has been refreshed twice by asking all the participants if they wish to be removed or to add anyone else. It currently includes 1,457 organisations and businesses, including business organisations, the 100 largest businesses in the county and all others that have asked to be included, every waste management business within 25 miles of Worcester, every amenity, community, faith and interest group we are aware of, every District and Parish council within the county and every one adjoining the county, every individual who has ever expressed an interested or commented at any time on earlier stages of the strategy as it has been developed, and every national body prescribed by government.

2e) Earlier kinds of planning document, such as the County Structure Plan, were taken on roadshows of the kind you suggest, the level of participation was dismal and we have discontinued the practice.

As part of the Best Practicable Environmental Option (for waste) process in 2003 we distributed an information and leaflet via all the free newspapers in the county and (because there are no free newspapers in the Malvern area) in the Malvern Gazette, informing people about the proposal and inviting their views and inviting them to see if they were interested in attending a stakeholder meeting. Public notices were also inserted into every newspaper in the county. We had 1,010 replies. We took this as an indication of all those interested in waste planning issues and they have been the core of the Waste Core Strategy consultation list since. You can imagine that this exercise was very expensive. We could not repeat it, since then our consultations have been based on writing to everyone on the database and putting notices in every newspaper. For the "Evidence Gathering" stage of the Waste Core Strategy in 2004 we held three stakeholder meetings, which were led by independent facilitators, Social Research Associates, to enable free discussion. 80 people attended. Three more workshops were held in 2005 to discuss the "Moving Towards the Identification of Preferred Options" stage. Further workshops were proposed to discuss the (first) Pre-Submission stage in 2006, only 13 people attended a workshop meeting in Worcester, two others were cancelled.

We have also held meetings with the Federation of Small Businesses, Chamber of Commerce, Worcestershire Partnership and used the Citizens Panel (1,000 members).

The circulation list includes every Parish Council in and adjoining the county and although imperfect, this is a way of directing the consultation to the most local level.

As part of the Regulation 27 consultation we wrote to all the Parish Councils on 21<sup>st</sup> January to inform them that we would be holding the consultation from 22<sup>nd</sup> March to 3<sup>rd</sup> May to enable them to ensure that their meeting timetables would enable them to consider the consultation.

2f) I appreciate that it is difficult for individuals to comment on the legality or soundness of the document without a knowledge of the law and statutory procedures. The definitions and tests are set out in statutory regulations and government policy, we have no flexibility in this regard ourselves. These are complex matters and there are no easy solutions. We prepared guidance notes on these matters which were available on our website, sent out with every request for information and available at Libraries and council Hubs, to try to help people frame their responses. I agree that the

terms and definitions are difficult, we have to meet them ourselves and there is almost no guidance from government on how to do so. A special "Regulation 30" report has to be submitted to the Inspector as part of the Examination into the Waste Core Strategy to show how, when and who we consulted. It is currently still being compiled but I attach a copy of the (current) contents page for your information. The final version will be available on our website and at County Hall and the county and district hubs and libraries throughout the county, or from me on request when we submit the Strategy to the Secretary of State. I estimate that this will be in mid July. Please contact me closer to the time if you would like a copy.

I hope that this has helped to meet some of your concerns.

Yours sincerely

**Nick Dean**

# Appendix 7: Correspondence with Environment Agency

Ms Ruth Clare  
Planning Technical Specialist  
Environment Agency  
Midlands Region, West Area  
Riversmeet House  
Newtown Industrial Estate  
Northway Lane  
Tewkesbury  
GL20 8JG

25 May 2011

Our ref: SP 8010.11 (consultation ref. 1733/45)  
Your ref: SV/2010/103980/CS-04/SB1-L01  
Ask for: Nicholas Dean

Dear Ms Clare

## **Worcestershire Waste Core Strategy Development Plan Document: Publication Document (Regulation 27) consultation**

Thank you for your helpful response to the above consultation. Your comments have been duly recorded and will be forwarded to the Secretary of State when we submit the Waste Core Strategy for examination.

Where possible I would like to resolve any outstanding issues prior to the examination and submit suggested changes to the Inspector for consideration. In your response, you suggested some changes you would like to see made to the Waste Core Strategy, although you did not raise these as issues of soundness.

I would like to suggest the following changes to the Waste Core Strategy Publication (Regulation 27) document, I hope that they address your concerns but if they don't I would welcome a meeting to discuss them further.

**In your response regarding the explanatory text to Policy WCS8 Flood risk (recorded by us as response 1733/45c) you suggest that some further explanatory text could be included in line with your response to the First Draft Submission consultation, therefore we propose the following changes:**

Proposed change, insert new paragraph after 5.13:

*"In order to remain safe and operational during flood events, waste management facilities should be designed to ensure that materials are stored in a way that would not result in pollution on-site during flooding, and would not allow materials to be washed away and result in pollution problems elsewhere. Safe access for vehicles and pedestrians to the development in the event of flooding should also be considered."*

Proposed change to paragraph 5.14:

*"New development can avoid increasing flood risk on the site and elsewhere by incorporating sustainable drainage systems (SuDS)<sup>75</sup>, such as green roofs and permeable car parks, that can cope with high levels of rainfall and improve attenuation of run-off and do not result in either deterioration in water quality or pollution being discharged into local watercourses. There*

*should be no net reduction in flood storage areas and development should not impede flood flow routes."*

**In your response regarding Policy WCS3 (recorded by us as response 1733/45d), you request that part b(ii) includes wording from previous policy WCS6 in the *First Draft Submission* document for landfill restoration schemes to protect and enhance the local environment:**

The wording used in policy WCS6 in the *First Draft Submission* consultation for the protection and enhancement of the local environment in landfill restoration schemes has not been carried through to the new policy WCS 3 as this concept is now covered through Policies WCS7, WCS9 and WCS10. However, for clarity, we propose the following changes:

Policy WCS3 part b)ii):

*"a restoration scheme **which contributes positively to the objectives of the development plan, with details of aftercare for a minimum period of 5 years.**"*

Paragraph 3.29:

*"All proposals for new landfill capacity need to consider the whole life of the landfill site, from engineering through to restoration. The restoration of landfill sites can provide opportunities to create new or enhance existing habitats and provide valuable open space for communities or recreational facilities and should maximise the opportunities to do so. The restoration scheme should be developed taking into account the considerations in Policy WCS 7, **and the objectives of relevant city, borough, district, parish and neighbourhood plans.**"*

This will ensure that restoration schemes are in accordance with the Waste Core Strategy, City, Borough and District Core Strategies and parish and neighbourhood plans. This would take into account the protection and enhancement of the local environment, but also allow some flexibility for other schemes which have recreation or other benefits.

It would be very helpful if you could reply to me either by letter or by email to [wcs@worcestershire.gov.uk](mailto:wcs@worcestershire.gov.uk) by 27<sup>th</sup> June 2011, or phone me on 01905 766374 to arrange a meeting.

Yours sincerely,

**Nicholas Dean**

Tel: 01905 766374

Email: [wcs@worcestershire.gov.uk](mailto:wcs@worcestershire.gov.uk)

Reply envelope enclosed

# Appendix 8: Correspondence with Malvern Hills District Council

Mr James Brain  
Assistant Planning Officer  
Malvern Hills District Council  
The Council House  
Avenue Road  
Malvern  
Worcestershire  
WR14 3AF

1 June 2011

Our ref: SP 8010.11 (consultation ref. 681/48)  
Your ref:  
Ask for: Nicholas Dean

Dear Mr Brain

## **Worcestershire Waste Core Strategy Development Plan Document: Publication Document (Regulation 27) consultation**

Thank you for your response to the above consultation. Your comments have been duly recorded and will be forwarded to the Secretary of State when we submit the Waste Core Strategy for examination.

In your response, you suggested some changes you would like to see made to the Waste Core Strategy. Where possible I would like to resolve any outstanding issues prior to the examination and submit suggested changes to the Inspector for consideration.

I suggest the following changes that I hope will address your concerns, however if these do not adequately address the issues you raised I would welcome a meeting to discuss them further.

**Under your heading "Justified" (recorded by us as response 681/48b) you commented that some further citation was required. We therefore propose the following changes:**

Proposed change to footnote 20 attached to paragraph 2.21:

*"**Information on Worcestershire's CO<sub>2</sub> emissions from Worcestershire Partnership Climate Change Strategy (2005-2011).** These figures exclude emissions from motorways"*

Proposed change to paragraph 2.7:

*"Land drainage and flooding issues are important influences on development in Worcestershire. Approximately 10% of the land area of Worcestershire is at risk of flooding <sup>NEW FOOTNOTE</sup>. Flooding affects every town in the county and can significantly affect where waste management development can take place. This will place more limitations on some types of facilities than others: waste water treatment could be suitable on the functional flood plain but other types of facilities would not."*

New footnote text: *"**Planning for Climate Change in Worcestershire Technical Research Paper Draft: May 2008**"*

Proposed change to paragraph 2.8:

*"71% of the population of Worcestershire live in urban areas, principally Worcester, Redditch and Kidderminster, Stourport on Severn, Bromsgrove, Malvern, Droitwich Spa and Evesham, with over*

one sixth of the population living in Worcester<sup>NEW FOOTNOTE</sup>. Some smaller towns, notably Bewdley, Pershore, Upton-upon-Severn and Tenbury Wells provide a traditional market town role serving an extensive rural hinterland."

New footnote text:

**"Worcestershire County Economic Assessment 2009-2010"**

Proposed change to paragraph 2.17:

*"The strategic rail network within Worcestershire has strong links to the north and south of the county. Worcester, Kidderminster, Redditch, Bromsgrove, Droitwich Spa, Malvern, Evesham and Pershore are all connected to the rail network. There is rail capacity for freight movement on most routes in Worcestershire although this is not available at peak times. There are, however, no major rail freight facilities located in the county. The development of new stations or railheads is likely to be challenging. Trainloads generally convey around 1000 tonnes payload meaning that even on a weekly train basis a terminal/waste transfer station would need to have throughput of 52,000 tonnes a year<sup>NEW FOOTNOTE</sup>. There is no evidence to suggest that such a terminal would be economically viable in Worcestershire at present. However the Waste Core Strategy will encourage potential for rail transport to be considered where appropriate."*

New footnote text: **"Information provided by Network Rail in response to the Waste Core Strategy First Draft Submission consultation (reference WR25-4 in the 'Consultation Response Document, December 2010')"**

Proposed change to paragraph 2.22:

*"The greenhouse gases that make the largest contribution to global warming are carbon dioxide, methane and nitrous oxide. All three can be produced during the management and disposal of wastes. In the UK waste management is estimated to contribute around 2.5% of total greenhouse gas emissions and 41% of all methane emissions<sup>NEW FOOTNOTE (A)</sup>. Most of these emissions come from the landfill of biodegradable waste<sup>NEW FOOTNOTE (B)</sup>. Re-using and recycling waste can reduce the greenhouse gas emissions produced as waste decomposes. These activities can also result in a greenhouse gas reduction and energy benefit by recovering energy or recycling materials and reducing the need for virgin materials."*

New footnote A text: **"Stern Review on the Economics of Climate Change s.l.: HM Treasury, 2006. See Waste Core Strategy background document 'Climate change and waste management in Worcestershire'."**

New footnote B text: **"Defra Waste Strategy for England 2007"**

Proposed change to paragraph 2.35:

*"In Worcestershire, most existing facilities are smaller than 0.5 ha in size (65% of facilities), with only 22% of facilities being over 1 ha in size. There are however some larger sites in the county, with the largest being approximately 13 ha<sup>NEW FOOTNOTE</sup>."*

New footnote text: **"See Waste Core Strategy background document 'Waste sites in Worcestershire'."**

**Under your heading "Justified" (recorded by us as response 681/48b) you commented that Table 7 Environmental Assets on page 46 should include Areas of Outstanding Natural Beauty (AONBs) as a national designation:**

Areas of Outstanding Natural Beauty (AONB) have not been included in Table 7 as they are considered separately in policy WCS 10. However, we propose a change to paragraph 5.5:

*"International, National and Local designated sites, habitats, species and heritage assets are listed in Table 7<sup>NEW FOOTNOTE</sup>."*

New footnote text: **"Areas of Outstanding Natural Beauty and Green Belt are considered in policy WCS 10 Local Characteristics".**

Under your heading "Effective" (recorded by us as response 681/48c) you commented on the potential impact of housing and employment changes on delivery of the Waste Core Strategy. We therefore propose the following changes:

Proposed change to paragraph 8.27:

"8.27 The capacity gap and therefore the land requirements identified in **Table 3** and **Appendix 4** are based on the following assumptions:

- **Estimates of projections based on the assumptions in Table 9.**

*In practice however these projections are likely to be above actual levels of waste arisings. They are already higher than the figures for actual waste arisings for comparable years as set out in the Waste Data Interrogator (WDI). The WDI shows a 28% decrease in the amount of HCI waste managed in Worcestershire between 2007-2009 and a 21% decrease in waste managed in England over the same period.*

*The projections make no allowance for the possibility that fiscal and regulatory policies and national and local initiatives will themselves foster more efficient industrial practices and further reductions in waste production. In the short term at least the current economic downturn has already led to reduced output and it is possible that both will remain lower for some years to come.*

*The projections of MSW, clinical waste and C&D waste arisings are based on household growth targets set out in the proposed RSS phase two revision. However the proposed revision has not been adopted and the Secretary of State has expressed his intention to revoke the existing RSS. At the time of publication the only planning authority in Worcestershire with an adopted Core Strategy is Wyre Forest District Council and several local planning authorities across Worcestershire have yet to locally determine future housing and employment provision. This will need to be monitored and any impacts on the projections and the deliverability of the Waste Core Strategy will be considered in the Annual Monitoring Report.*

- **All existing facilities will continue to operate at their current capacity and increased capacity will be realised through new facilities:** This is important as it allows for adequate capacity to be planned for, however in practice it is very possible that some additional capacity will be provided through the intensification of existing sites..."

Proposed change to Paragraph 8.39

"8.39 In Worcestershire many existing waste management operations currently take place on industrial estates. *This trend and the findings of the Industrial Estates Study indicate that this element of the Waste Core Strategy will be deliverable. However at the time of publication local planning authorities across Worcestershire, with the exception of Wyre Forest, have yet to locally determine future provision of employment provision. Development plan documents will need to be monitored as they emerge, to ensure that the Waste Core Strategy remains deliverable in the medium to long-term.*"

I would be grateful if you could reply to me either by letter or by email to [wcs@worcestershire.gov.uk](mailto:wcs@worcestershire.gov.uk) by 15<sup>th</sup> June 2011 to tell me whether you agree with these proposed changes, or phone me on 01905 766374 to arrange a meeting.

Yours faithfully

**Nicholas Dean**

Tel: 01905 766374

Email: [wcs@worcestershire.gov.uk](mailto:wcs@worcestershire.gov.uk)

Reply envelope enclosed





# Appendix 9: Correspondence with Axis (on behalf of Mercia Waste Management)

Nick Roberts  
Planning Consultant  
Axis (on behalf of Mercia Waste Management)  
Camellia House  
76 Water Lane  
Wilmslow  
SK9 5BB

6 June 2011

Our ref: SP.8010/11 (consultation ref 1679/49)  
Ask for: Nicholas Dean

Dear Mr Roberts

## **Worcestershire Waste Core Strategy Development Plan Document: Publication Document (Regulation 27) consultation**

Thank you for your response to the above consultation. Your comments have been duly recorded and will be forwarded to the Secretary of State when we submit the Waste Core Strategy for examination.

Your detailed response contained some concerns and you suggested some changes you would like to see made to the Waste Core Strategy. Where possible I would like to resolve any outstanding issues prior to the examination and submit any suggested changes to the Inspector for consideration.

I have attached a table with our response to each of your points, with further explanation and with some suggested changes that I hope will address your concerns. However if these do not adequately address the issues you raised I would welcome a meeting to discuss them further.

I would be grateful if you could reply to me either by letter or by email to [wcs@worcestershire.gov.uk](mailto:wcs@worcestershire.gov.uk) by 28<sup>th</sup> June 2011 to tell me whether you agree with these proposed changes, or phone me on 01905 766374 to arrange a meeting.

Yours faithfully



**Nicholas Dean**

Tel: 01905 766374  
Email: [wcs@worcestershire.gov.uk](mailto:wcs@worcestershire.gov.uk)

	Representation	Your comment	Our proposed action																														
<b>1679/49 a</b>  Mr N Roberts  Axis on behalf of Mercia Waste Management	<b>Part:</b> 2.39-2.43, Appendix 4, Tables 2, 3 and 10  <b>Legally compliant:</b> Not specified  <b>Sound:</b> No	We continue to fail to understand in detail how the capacity gap has been calculated. The figures appear to differ significantly from the First Draft Submission of the Worcestershire Core Strategy (Sept 2010). In respect of Appendix 4, we believe the MSW ‘other recovery’ gap is fundamentally incorrect but cannot understand how these figures have been derived. The capacity gap assessment needs to be simplified, use common headings and present a clearer picture over the full plan period.	<p>Full details of how the capacity gap for all waste streams has been calculated are given in the background document "<i>Arisings and capacity</i>".</p> <p>Some of the figures were re-addressed following the <b>First Draft Submission</b> consultation in order to take into account concerns which were expressed by a number of respondents regarding some of the data used and to address the capacity gap in a way which more closely reflects the Waste Hierarchy.</p> <p>However, with regard to Municipal Solid Waste (MSW) arisings and projections, the figures have not changed since the <b>First Draft Submission</b> consultation and remain the same projections used in the JMWMS. The version of the "<i>Arisings and capacity</i>" document published alongside the <b>First Draft Submission</b> consultation, dated September 2010, makes the following assumptions in <b>Table 15 (MSW Projections; tonnes p.a. (Worcestershire and Herefordshire combined))</b>:</p> <table><tr><td></td><td><b>2007 (baseline)</b></td><td><b>2010</b></td><td><b>2015</b></td><td><b>2020</b></td><td><b>2025</b></td><td><b>2034</b></td></tr><tr><td>MSW arisings per year (tonnes)</td><td>395,993</td><td>405,139</td><td>421,817</td><td>438,496</td><td>455,175</td><td>485,197</td></tr></table> <p>and the version published alongside the <b>Publication Document</b> (Regulation 27) consultation, dated 9<sup>th</sup> March 2011, repeats these with the addition of the 5 year interval for 2030 in <b>Table 34 (MSW Projections; tonnes p.a. (Worcestershire and Herefordshire combined))</b>:</p> <table><tr><td></td><td><b>2007 (baseline)</b></td><td><b>2010</b></td><td><b>2015</b></td><td><b>2020</b></td><td><b>2025</b></td><td><b>2030</b></td><td><b>2034</b></td></tr><tr><td>MSW arisings per year (tonnes)</td><td>395,993</td><td>405,139</td><td>421,817</td><td>438,496</td><td>455,175</td><td>471,854</td><td>485,197</td></tr></table>		<b>2007 (baseline)</b>	<b>2010</b>	<b>2015</b>	<b>2020</b>	<b>2025</b>	<b>2034</b>	MSW arisings per year (tonnes)	395,993	405,139	421,817	438,496	455,175	485,197		<b>2007 (baseline)</b>	<b>2010</b>	<b>2015</b>	<b>2020</b>	<b>2025</b>	<b>2030</b>	<b>2034</b>	MSW arisings per year (tonnes)	395,993	405,139	421,817	438,496	455,175	471,854	485,197
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	Representation	Your comment	Our proposed action
			<p>Following government thinking that there should be closer integration in planning for all waste streams, the capacity gaps for all waste streams have been combined in Tables 2, 3 and 10 in the <b>Publication Document</b>. The full details of how these have been worked out are set out in the "<i>Arisings and capacity</i>" document. Appendix 4 in the WCS <b>Publication Document</b> has been included to show the proportions from each waste stream and the predicted source of arisings in more detail.</p> <p>The 'other recovery' capacity gap for all waste streams detailed in Appendix 4 of the <b>Publication Document</b> is based on:</p> <ul style="list-style-type: none"> <li>• C&amp;I waste - achieving targets of 55% re-use and recycling, 20% recovery, 25% landfill</li> <li>• Hazardous waste - achieving targets of 55% re-use and recycling, 20% recovery, 25% landfill</li> <li>• MSW – achieving targets of 50% re-use and recycling (including composting), 23% recovery, 22% landfill, with provision for the remaining 5% as either re-use and recycling or recovery (making the totals 55% and 28% respectively).</li> </ul> <p>This is set out in Section 4 of the March 2011 "<i>Arisings and capacity</i>" document and Objective WO3 in the Waste Core Strategy <b>Publication Document</b>.</p> <p>The targets used in the Waste Core Strategy for MSW have considered the JMWMS, but do differ from them by setting a more demanding target for 2020. These are in line with national targets for household waste. The range of targets considered, the options chosen and a risk assessment of</p>

	Representation	Your comment	Our proposed action
			<p>the approach are shown on pages 74-79 of the March 2011 "<i>Arisings and capacity</i>" document.</p> <p>To summarise the differences: the reviewed JMWMS contains a variety of targets, which reflect the Waste Strategy for England 2007 in Target 3 and Best Practicable Environmental Option assessment in Target 5, although these are difficult to compare and utilise as target 3 relates to <b>household</b> waste and target 5 to <b>municipal waste</b>.</p> <p>The Waste Core Strategy targets are to recover value from 78% of MSW by 2020, made up of:</p> <ul style="list-style-type: none"> <li>• 50% re-use and recycling (including composting)</li> <li>• 23% recovery (With 22% as landfill/disposal)</li> </ul> <p>However, this means the remaining 5% could be managed by re-use, recycling or recovery. Therefore, to ensure all possible scenarios are enabled, in calculating capacity requirements, we have made provision for the additional 5% to be managed by either re-use and recycling or recovery, calculating:</p> <ul style="list-style-type: none"> <li>• the re-use and recycling capacity requirement at 55% and</li> <li>• the recovery requirement at 28%. (With 22% as landfill/disposal).</li> </ul> <p>A comparison of the targets and target dates given in the JMWMS and the WCS is shown below:</p>

	Representation	Your comment	Our proposed action					
					2010	2014	2015	2020
			JMWMS	Target 3 Recycling/ Composting <b>household</b> waste (Waste Strategy for England 2007)	40%	(Interim target 43%)	45%	50%
				Target 5 Recovering value from <b>Municipal</b> waste (BPEO)			78% by: <ul style="list-style-type: none"> <li>• Min 33% recycled/com posted,</li> <li>• Max 22% landfilled,</li> <li>• Remainder energy recovery.</li> </ul>	
			WCS	Objective WO3 <b>Municipal</b> waste				78% by: <ul style="list-style-type: none"> <li>• 50% re-use and recycling (incl. composting)</li> <li>• Max 22% Landfilled</li> <li>• 23% 'other recovery'</li> <li>• Remaining 5% either re-use and recycling or 'other recovery'</li> </ul>
			<p>These targets have formed the basis for the MSW capacity gap for 're-use and recycling' and 'other recovery' and as such have informed our calculations of land requirements and assessment of deliverability of the Waste Core Strategy.</p>					

	Representation	Your comment	Our proposed action
			<p>Having considered your comments we agree that the wording of the target in objective WO3 is not as clearly expressed as it could be, and for clarification we propose the changes as follows:</p> <p><b>"WO3 To make driving waste up the waste hierarchy the basis for waste management in Worcestershire.</b></p> <p><i>The following minimum targets for <b>re-use and</b> recycling, (including composting) and 'other recovery' have been set in relation to this objective<sup>47</sup>:</i></p> <p><i>C&amp;I incl Hazardous and Agricultural waste - 75%</i></p> <p><i>C&amp;D - 75%</i></p> <p><i>MSW - 78%, with a target of 50% <b>re-use and</b> recycling <del>and composting</del> by 2020, <b>23% 'other recovery' and</b> a maximum of 22% landfill/<b>disposal</b> <del>And (the remainder remaining 5% as either re-use and recycling or 'other recovery') energy recovery.</del>"</i></p>
<p><b>1679/49 b</b></p> <p>Mr N Roberts</p> <p>Axis on behalf of Mercia Waste Management</p>	<p><b>Part:</b> 2.39-2.44, Appendix 4, Tables 2, 3 and 11</p> <p><b>Legally compliant:</b> No</p> <p><b>Sound:</b> Not specified</p>	<p>The calculation of the capacity gap has not had regard to the information contained in the Joint Municipal Waste Management Strategy 1st Review. It presents inconsistent figures, particularly in respect of future MSW capacity requirements for 'other recovery'.</p>	<p>See above response to 1679/49 a.</p>

	Representation	Your comment	Our proposed action
<b>1679/49 c</b> Mr N Roberts Axis on behalf of Mercia Waste Management	<b>Part:</b> Figure 14 <b>Legally compliant:</b> Not specified <b>Sound:</b> No	Annex A Figure 19 shows the identified areas of search for suitable sites for most waste management developments. This lists Hartlebury Trading Estate in the Geographic Hierarchy Level 1 (The Kidderminster Zone). Detailed analysis of Figure 14 indicates that the map is in error by not encompassing Hartlebury Trading Estate within the Level 1 area. Consultation with Worcestershire County Council Planners has indicated this is an error. Nevertheless, the Waste Core Strategy is internally inconsistent and Figure 14 should be revised in order for the Waste Core Strategy to be effective.	Figure 14: Key Diagram: Geographic Hierarchy provides a diagrammatic representation of the spatial strategy. Hartlebury Trading Estate is not identified specifically on this diagram, nor are any other industrial estates. Annex A Figure 19 outlines the zones into which the Council considers the listed industrial estates to fall and specifies Hartlebury Trading Estate as being in Geographic Hierarchy level 1 "Kidderminster zone".
<b>1679/49 d</b> Mr N Roberts	<b>Part:</b> 2.58, 3.8, WCS1, WCS4, Annex A, Figure	The Waste Core Strategy in defining its Geographical Hierarchy fails to give due	The geographic hierarchy is defined based on levels of waste arisings, resource demand, onward treatment facilities, connections to the strategic transport network and potential for future development of waste

	Representation	Your comment	Our proposed action
Axis on behalf of Mercia Waste Management	13, Figure 14 <b>Legally compliant:</b> Not specified <b>Sound:</b> No	regard to the environmental constraints/needs with certain types of waste facility specifically open windrow composting (OWC). The national evidence base (manifested through the Environment Agency Position Statement Nov 2010) restricts OWC development within 250 meters of any sensitive receptor (including places of work, gardens etc). The basis of defining the Geographic Hierarchy and the sites listed in Annex A fail to take regard to this position and cannot be justified. In addition, the Waste Core Strategy is not effective as it is not based on sound infrastructure delivery planning, nor reflects this national regulatory barrier to delivery. The Waste Core Strategy should treat OWC differently in terms of the Geographical Hierarchy and	management facilities and is designed to direct development to the most appropriate areas of the county. The zones within the geographic hierarchy cover urban and surrounding areas. However, the Waste Core Strategy should be considered as a whole. Policy WCS4 sets out compatible land uses and policy WCS11 considers the potential impacts from waste management development on amenity.  Policy WCS11 and paragraph 5.46-5.50 consider the potential impacts from waste management facilities on amenity, including consideration of bioaerosols and the Environment Agency's requirement for bioaerosol risk assessments for development managing biodegradable waste within 250 metres of sensitive receptors.  Policy WCS4 identifies redundant agricultural or forestry buildings or their curtilage and sites with current use rights for waste management purposes as compatible land uses. In addition, active mineral workings and landfill sites are identified as a compatible land use for open windrow composting where a clear operational relationship is demonstrated. This is to reflect the temporary nature of these types of activities and links closely to the justification for policy WCS 5.  Waste water treatment facilities, open windrow composting and landfill are the only land uses identified as compatible with greenfield land, however these must be strongly justified due to the impact of hard-standing and other associated infrastructure.  Section 8 considers the deliverability of the Strategy, including whether it is realistic to expect facilities to be delivered on the land types identified in policy WCS4. The range of locations suitable for open windrow



	Representation	Your comment	Our proposed action
		thus Policies WCS1 and WCS 4 should be amended. In particular we note that active landfill sites and mineral workings should be compatible land uses, as should greenfield sites. This would reflect the fact that the County's major OWC facility is located on a landfill within Level 3 and many OWC facilities throughout the UK are similarly located on landfills or greenfield sites.	composting may be limited and where this is the case, this may support an application for open windrow composting in lower levels of the geographic hierarchy.
<b>1679/49 e</b> Mr N Roberts Axis on behalf of Mercia Waste Management	<b>Part:</b> WCS2 <b>Legally compliant:</b> Not specified <b>Sound:</b> No	The quoting of stack heights in Policy WCS2 Part b. has no meaningful purpose and is not derived from a robust/credible evidence base. They are meaningless in terms of defining locations and wholly ignore other factors that influence stack height. They appear to be derived from the Habitat Regulations Assessment, but	The quoted stack heights in Policy WCS2 part b are derived from the Waste Core Strategy Habitats Regulations Assessment (the HRA). As stated in paragraph 3.19, the limits set represent the findings of the HRA modelling assessment and the level at which it was indicated that there would be no likely significant effects on the Lyppard Grange Ponds Special Area of Conservation (SAC). This part of the policy is intended to protect the SAC. To clarify the assumptions behind these throughputs and stack heights and enable assessment of the impact of any proposals, we propose the following change:  <b>Change proposed</b> to policy WCS2 part b:  <i>"b) where they are located at the highest appropriate level of the</i>

	Representation	Your comment	Our proposed action
		have no place in this policy. The emissions from a 250,000tpa facility are dictated by numerous factors and thus there is no definition of what typically would be emitted from a 250,000tpa facility with an 80m stack.	<p><i>geographic hierarchy and it is demonstrated that:</i></p> <p><i>iii. in level 1a and level 2:</i></p> <ul style="list-style-type: none"> <li>the <b><i>impact of emissions</i></b> will be the same as or less than a thermal treatment facility with a throughput of 250,000 tpa and a stack height of 80 metres (<b><i>as assessed in the Waste Core Strategy Habitats Regulations Assessment</i></b>).</li> </ul> <p><i>iv. in level 1b:</i></p> <ul style="list-style-type: none"> <li>the <b><i>impact of emissions</i></b> will be the same as or less than a thermal treatment facility with a throughput of 150,000 tpa and a stack height of 80 metres (<b><i>as assessed in the Waste Core Strategy Habitats Regulations Assessment</i></b>)."</li> </ul>
<p><b>1679/49 f</b></p> <p>Mr N Roberts</p> <p>Axis on behalf of Mercia Waste Management</p>	<p><b>Part:</b> 5.32, 5.33, WCS9</p> <p><b>Legally compliant:</b> Yes</p> <p><b>Sound:</b> Yes</p>	<p>Whilst the Waste Core Strategy is not unsound or legally compliant it is unrealistic to expect all types of waste facility to be able to provide 10% of their energy supply from renewable resources. As an example a Material Recycling Facility (MRF) or Mechanical Biological Treatment (MBT) plant will use significant quantities of energy in</p>	<p>We do not consider that the first part of your suggested wording "unless it can be demonstrated that wider sustainable development objectives would be met by the proposal" is appropriate as this would effectively exclude the majority of facilities managing waste at the higher levels of the waste hierarchy (i.e. re-use, recycling, composting and potentially also energy recovery).</p> <p>However, we propose the following changes:</p> <p><b>Change proposed</b> to Policy WCS 9 d:</p> <p><i>"all new built development or significant alterations to buildings which create a gross building footprint of 1000 square metres or more gaining at least 10%<sup>78</sup> of energy supply annually from on-site renewable sources. <b><i>Where it is demonstrated that this is not practicable, this should be</i></b></i></p>

	Representation	Your comment	Our proposed action
		<p>recycling waste or potentially making a renewable fuel. Both activities contribute to wider energy savings/climate change objectives. It would be inappropriate to hinder such development through this policy requirement where sourcing 10% of the energy need from renewables is either impractical or makes the development non-viable. As such it is suggested that Policy WCS9 criterion d. should have the following caveat: “unless it can be demonstrated that wider sustainable development objectives would be met by the proposal and the provision of renewable energy supply is either not practical or makes the scheme non-viable.”</p>	<p><i>achieved through off-site solutions; and"</i></p> <p><b>Change proposed</b> to paragraph 5.33:</p> <p><i>"The suitability <b>and viability</b> of particular methods will depend on the type of development and the proposed location. The design and operation of proposals for renewable energy provision should address potential amenity and environmental effects in line with the requirements of the Development Plan."</i></p>
1679/49 g	<p><b>Part:</b> WCS10</p> <p><b>Legally</b></p>	Policy WCS10 criterion c. makes the provision that	<p><b>Proposed change</b> to policy WCS10 part c:</p> <p><i>"do not constitute inappropriate development in areas designated as</i></p>

	Representation	Your comment	Our proposed action
Mr N Roberts Axis on behalf of Mercia Waste Management	<b>compliant:</b> Not specified <b>Sound:</b> No	waste facilities would not be permitted where they constitute inappropriate development in the Green Belt. This is inconsistent with national policy (e.g. PPS10 paragraph 3 and PPG2) where inappropriate development can be permitted if very special circumstances can be demonstrated. Indeed paragraphs 5.44 and 5.45 of the Waste Core Strategy explicitly recognises this fact. As a consequence criterion c. of Policy WCS 10 should have the following wording added: "unless very special circumstances can be demonstrated".	<i>Green Belt<sup>83</sup> or where very special circumstances are demonstrated which justify such inappropriate development".</i>
<b>1679/49 h</b> Mr N Roberts Axis on behalf of Mercia Waste	<b>Part:</b> WCS10 <b>Legally compliant:</b> No <b>Sound:</b> Not	Policy WCS10 criterion c. makes the provision that waste facilities would not be permitted where they constitute inappropriate	See above response to 1679/49 g.

	Representation	Your comment	Our proposed action
Management	specified	development in the Green Belt. This is inconsistent with national policy (e.g. PPS10 paragraph 3 and PPG2) where inappropriate development can be permitted if very special circumstances can be demonstrated. Indeed paragraphs 5.44 and 5.45 of the Waste Core Strategy explicitly recognises this fact. As a consequence criterion c. of Policy WCS 10 should have the following wording added: "unless very special circumstances can be demonstrated".	
<b>1679/49 i</b> Mr N Roberts Axis on behalf of Mercia Waste Management	<b>Part:</b> WCS2, WCS11 <b>Legally compliant:</b> No <b>Sound:</b> Not specified	We believe that the final paragraph in both Policies WCS2 and WCS11 sets the wrong test in terms of national planning policy. The use of the word exceptional sets the highest possible test for approving a proposal that is	We agree that 'exceptional' may set the wrong test, although we consider that a stringent test is necessary. We therefore propose the following changes.  <b>Proposed change</b> to policy WCS2 final paragraph:  " 'Other recovery' facilities will not be permitted in levels 3, 4 or 5 unless <i>exceptional circumstances are clearly demonstrated it is demonstrated that the benefits of the development in the proposed</i>

	Representation	Your comment	Our proposed action
		<p>contrary to development plan policy. The appropriate test is that a proposal which is not located in accordance with WCS2 or has unacceptable adverse impacts on local amenity should only be approved if material considerations indicate that the overall benefit of the scheme outweighs its harm. As a consequence the last paragraph of both policies should be amended to read: "Where the proposal would not accord with the objectives of this policy, schemes will only be permitted where it is demonstrated that the benefits of the development at the proposed site clearly outweigh any unacceptable adverse impacts." Such an approach would be entirely consistent with the final paragraph of Policy WCS7.</p>	<p><i>location clearly outweigh any unacceptable adverse impacts on local amenity."</i></p> <p><b>Proposed change</b> to policy WCS11 final paragraph:</p> <p><i><del>"Where these are not demonstrated, exceptional circumstances must be clearly justified by the applicant. Where these criteria are not met, waste management facilities will only be permitted where it is demonstrated that the benefits of the development in the proposed location clearly outweigh any unacceptable adverse impacts on local amenity."</del></i></p>







# Appendix 10: Correspondence with Natural England

Mr Antony Muller  
Lead Advisor, Land Use Operations Team  
Natural England  
Block B Government Buildings  
Whittington Road  
Worcester  
WR5 2LQ

6 June 2011

Our ref: SP.8010/11 (consultation ref 717/52)  
Your ref: 19793  
Ask for: Nicholas Dean

Dear Mr Muller

**Worcestershire Waste Core Strategy Development Plan Document:  
Publication Document (Regulation 27) consultation**

Thank you for your response to the above consultation. Your comments have been duly recorded and will be forwarded to the Secretary of State when we submit the Waste Core Strategy for examination.

In your response, you suggested some changes you would like to see made to the Waste Core Strategy in line with the Sustainability Appraisal. Where possible I would like to resolve any outstanding issues prior to the examination and submit suggested changes to the Inspector for consideration.

I have attached a table with our response to each of the points in Table 8.3 of the Sustainability Appraisal, with further explanation and with some suggested changes that I hope will address your concerns. However, if these do not adequately address the issues you raised I would welcome a meeting to discuss them further.

I would be grateful if you could reply to me either by letter or by email to [wcs@worcestershire.gov.uk](mailto:wcs@worcestershire.gov.uk) by 28<sup>th</sup> June 2011 to tell me whether you agree with these proposed changes, or phone me on 01905 766374 to arrange a meeting.

Yours faithfully

**Nicholas Dean**

**Nicholas Dean**  
Minerals and Waste  
Team Leader  
Planning, Economy  
and Performance

County Hall  
Spetchley Road  
Worcester  
WR5 2NP

Tel: 01905 766374  
Email: [wcs@worcestershire.gov.uk](mailto:wcs@worcestershire.gov.uk)

No.	SA Recommendation	Our Response
1	<p>Stronger incentives should be given to prioritise recycling and composting over residual waste treatment, for example by requiring applicants for recovery facilities to demonstrate that reuse and recycling have been “maximised” rather than “optimised” in policy WCS2 and by adopting a recycling target for C&amp;I waste.</p>	<p>The First Draft Submission version of the Waste Core Strategy used the term 'maximised' (previous policies WCS2 and WCS5). This was changed to 'optimised' in response to concerns from a number of consultees that 'optimise' would provide a more realistic and achievable requirement. In response to your and other comments however the following is proposed:</p> <p><b>Proposed change</b> to objective WO3:</p> <p><b><i>"WO3 To make driving waste up the waste hierarchy the basis for waste management in Worcestershire.</i></b>  <i>The following minimum targets for re-use and recycling, (including composting) and 'other recovery' have been set in relation to this objective<sup>47</sup>:</i>  <i>C&amp;I incl Hazardous and Agricultural waste - 75%, with a minimum of 55% re-use and recycling</i>  <i>C&amp;D - 75%</i>  <i>MSW - 78%, with a target of 50% recycling and composting by 2020, a maximum of 22% landfill and the remainder as energy recovery."</i></p>
2	<p>The WCS should give explicit support to the recycling of construction and demolition waste onsite in development projects in policy WCS14.</p>	<p>Noted. It is conventional practice for on-site recycling of construction and demolition waste to take place under Permitted Development rights (up to 28 days in any calendar year, under the Town and Country Planning (General Permitted Development) Order 1995, Schedule 2, Part 4, Class B) or as an ancillary activity in the development. There is no evidence to suggest that this is a problem in Worcestershire. Statutory nuisance legislation exists to protect amenity.</p> <p>Having considered this, we <b>propose a change</b> to paragraph 5.27:</p> <p><i>"Design and construction of new buildings where the re-use of existing buildings is not appropriate and any alterations to existing buildings should consider resource efficiency. Minimising the use of virgin materials could be done in part by re-using materials or using recycled materials where appropriate. On-site recycling enables</i></p>

		<i>management of waste at source, reducing waste miles."</i>
3	Policies should require planning applications to demonstrate how a facility will be located to minimise waste miles, for example in policy WCS6.	The waste management industry operates in the free market and reflects the normal working of the economy. Instead of including specific policies on waste miles, which would not be enforceable, the spatial strategy has been developed to guide waste management facilities towards areas with the highest levels of waste arisings and resource demand, amongst other considerations.
4	The supporting text to policy WCS9 should include reference to the role of waste transport in increasing energy efficiency and reducing greenhouse gas emissions.	<p>This is not considered to be an appropriate amendment. Policy WCS9 relates to the sustainable <b>design</b> and <b>operation</b> of the waste management facility itself. Waste transport is considered in policy WCS6. However, a reference could be added to the explanatory text to policy WCS6 in paragraph 4.9.</p> <p><b>Proposed change</b> to paragraph 4.9:</p> <p><i>"All developments must take into account local movement and transportation policies in the adopted Local Transport Plan, Local Plans and Local Development Frameworks. <b>They and</b> should aim to minimise the impact of the development by reducing the need for visitors and the workforce to travel <b>and the need to transport waste. These measures can increase energy efficiency and reduce greenhouse gas emissions associated with the waste management facility."</b></i></p>
5	Applications for waste development should clearly show how impacts on flood risk, air quality, biodiversity, historic assets, residential amenity and open space will be avoided or enhancements delivered, for those sites in areas of search with constraints.	Applicants for waste management facilities are required to consider these issues through policies WCS8 (flood risk), WCS11 (air quality, residential amenity), WCS7 (biodiversity, historic assets) and policy WCS4 protects open space by preventing development of waste management facilities on greenfield land except for waste water treatment, open windrow composting and landfill where strongly justified.
6	The WCS should promote flood risk reduction and water quality enhancement where practicable (WCS8).	Policy WCS8 addresses these issues and has been supported by the Environment Agency.

7	WCS10 should require the avoidance or minimisation of effects on landscape character and the quality of the built environment, and enhancement where practicable.	<p>Agreed, <b>proposed change</b> to policy WCS10 part a:</p> <p>"a) <i>protect and enhance <del>take account of</del> local characteristics, through consideration of:..."</i></p>
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# Annex 1: Schedule of draft proposed changes to be submitted to the Inspector for consideration

Change	Reason
<b>1. Introduction</b>	
<p><b>Paragraph 1.9:</b></p> <p><i>"It provides for all the following kinds of Directive Waste<sup>4</sup> produced in, or imported into, Worcestershire:</i></p> <ul style="list-style-type: none"> <li>• <i>Commercial and Industrial (C&amp;I) Waste<sup>5</sup>,</i></li> <li>• <i>Construction and Demolition (C&amp;D) Waste,</i></li> <li>• <i>Municipal Solid Waste (MSW)<sup>6</sup>,</i></li> <li>• <i>Hazardous Waste<sup>6a</sup>, and</i></li> <li>• <i>Waste water.</i></li> </ul> <p><i>All policies will apply equally to all of these waste streams. <del>It</del> <b>The Waste Core Strategy</b> does not address non-Directive Agricultural Waste, such as crop residues and animal dung <b>where they are managed on the farm holding where they originated</b>, or mineral waste where this is dealt with within the quarry or gravel pit where it is produced."</i></p>	For clarity.
<b>2. Spatial Portrait</b>	
<p><b>Proposed change to paragraph 2.7</b></p> <p><i>"Land drainage and flooding issues are important influences on development in Worcestershire. Approximately 10% of the land area of Worcestershire is at risk of flooding <sup>NEW FOOTNOTE</sup>. Flooding affects every town in the county and can significantly affect where waste management development can take place. This will place more limitations on some types of facilities than others: waste water treatment could be suitable on the functional flood plain but other types of facilities would not."</i></p> <p>New footnote text: <b>"Planning for Climate Change in Worcestershire Technical Research Paper Draft: May 2008"</b></p>	<p>Change proposed in response to <b>1280/22</b>.</p> <p>Malvern Hills District Council has been contacted to discuss the changes proposed.</p>
<p><b>Proposed change to paragraph 2.8</b></p> <p><i>"71% of the population of Worcestershire live in urban areas, principally Worcester, Redditch and Kidderminster, Stourport on Severn, Bromsgrove, Malvern, Droitwich Spa and Evesham, with over one sixth of the population living in Worcester <sup>NEW FOOTNOTE</sup>. Some smaller towns, notably Bewdley, Pershore, Upton-upon-Severn and Tenbury Wells provide a traditional market town role</i></p>	<p>Change proposed in response to 1280/22.</p> <p>Malvern Hills District Council has been contacted to discuss the changes proposed.</p>

Change	Reason
<p>serving an extensive rural hinterland."</p> <p>New footnote text:</p> <p>"<a href="#">Worcestershire County Economic Assessment 2009-2010</a>"</p>	
<p><b>Proposed change to paragraph 2.16</b></p> <p><i>"The canal network is extensive and connects to systems to the north, south and east of the County. Worcester (Worcester &amp; Birmingham canal) and Stourport (Staffordshire &amp; Worcestershire Canal) are placed on the river and canal network and the Droitwich Canals have recently undergone restoration to link to the River Severn and the Worcester &amp; Birmingham Canal. There are however some limitations on vessel size due to the locks on or between the canals. <del>Though there is</del> <del>and there is</del> little likelihood of increased freight traffic on the county's canals in the foreseeable future, <a href="#">there is more potential for the use of the River Severn</a>. The Waste Core Strategy encourages the consideration of freight transport by water where possible, but recognises that potential is limited."</i></p>	<p>Change proposed in response to <b>1280/22</b>.</p> <p>British Waterways agreed this wording and raise no further objections (24<sup>th</sup> May 2011).</p>
<p><b>Proposed change to paragraph 2.17</b></p> <p><i>"The strategic rail network within Worcestershire has strong links to the north and south of the county. Worcester, Kidderminster, Redditch, Bromsgrove, Droitwich Spa, Malvern, Evesham and Pershore are all connected to the rail network. There is rail capacity for freight movement on most routes in Worcestershire although this is not available at peak times. There are, however, no major rail freight facilities located in the county. The development of new stations or railheads is likely to be challenging. Trainloads generally convey around 1000 tonnes payload meaning that even on a weekly train basis a terminal/waste transfer station would need to have throughput of 52,000 tonnes a year <sup>NEW FOOTNOTE</sup>. There is no evidence to suggest that such a terminal would be economically viable in Worcestershire at present. However the Waste Core Strategy will encourage potential for rail transport to be considered where appropriate."</i></p> <p>New footnote text: "<a href="#">Information provided by Network Rail in response to the Waste Core Strategy First Draft Submission consultation (reference WR25-4 in the 'Consultation Response Document, December 2010'</a> "</p>	<p>Change proposed in response to <b>1280/22</b>.</p> <p>Malvern Hills District Council has been contacted to discuss the changes proposed.</p>
<p><b>Proposed change to footnote 20 attached to paragraph 2.21</b></p> <p><a href="#">"Information on Worcestershire's CO<sub>2</sub> emissions Worcestershire Partnership Climate Change Strategy. These figures exclude emissions from motorways"</a></p>	<p>Change proposed in response to <b>1280/22</b>.</p> <p>Malvern Hills District Council has been contacted to discuss the</p>



Change	Reason
	changes proposed.
<p><b>Proposed change to paragraph 2.22</b></p> <p><i>"The greenhouse gases that make the largest contribution to global warming are carbon dioxide, methane and nitrous oxide. All three can be produced during the management and disposal of wastes. In the UK waste management is estimated to contribute around 2.5% of total greenhouse gas emissions and 41% of all methane emissions <sup>NEW FOOTNOTE A</sup>. Most of these emissions come from the landfill of biodegradable waste <sup>NEW FOOTNOTE B</sup>. Re-using and recycling waste can reduce the greenhouse gas emissions produced as waste decomposes. These activities can also result in a greenhouse gas reduction and energy benefit by recovering energy or recycling materials and reducing the need for virgin materials."</i></p> <p>New footnote A text: "<i>Stern Review on the Economics of Climate Change s.l.: HM Treasury, 2006. For further information see Waste Core Strategy background document 'Climate change and waste management in Worcestershire'.</i>"</p> <p>New footnote B text: "<i>Defra Waste Strategy for England 2007</i>"</p>	<p>Change proposed in response to <b>1280/22</b>.</p> <p>Malvern Hills District Council has been contacted to discuss the changes proposed.</p>
<p><b>Proposed change to paragraph 2.35:</b></p> <p><i>"In Worcestershire, most existing facilities are smaller than 0.5 ha in size (65% of facilities), with only 22% of facilities being over 1 ha in size. There are however some larger sites in the county, with the largest being approximately 13 ha <sup>NEW FOOTNOTE</sup>."</i></p> <p>New footnote text: "<i>See Waste Core Strategy background document 'Waste sites in Worcestershire'.</i>"</p>	<p>Change proposed in response to <b>1280/22</b>.</p> <p>Malvern Hills District Council has been contacted to discuss the changes proposed.</p>
<p><b>Proposed change to objective WO3:</b></p> <p><b><i>"WO3 To make driving waste up the waste hierarchy the basis for waste management in Worcestershire.</i></b></p> <p><i>The following minimum targets for re-use and recycling, (including composting) and 'other recovery' have been set in relation to this objective<sup>47</sup>:</i></p> <p><i>C&amp;I incl Hazardous and Agricultural waste - 75% with a minimum of 55% re-use and recycling</i></p> <p><i>C&amp;D - 75%</i></p> <p><i>MSW - 78%, with a target of 50% re-use and recycling and composting by 2020, 23% 'other recovery' and a maximum of 22% landfill/disposal, and with the remainder remaining 5% as either re-use and recycling or 'other recovery' energy recovery."</i></p>	<p>For clarity in response to <b>1679/49 a</b> and in response to Sustainability Appraisal table 8.3 'Mitigation recommendations' and representation <b>717/52 c</b>.</p> <p>Axis (on behalf of Mercia Waste Management) and Natural England have been contacted to discuss the proposed changes.</p>
<p><b>Proposed change to Figure 14</b></p> <p>Roads, rivers, canals and railways to be overlaid onto levels 1-5.</p>	<p>For clarity</p>

Change	Reason
<b>3. Managing waste as a resource</b>	
<p><b>Proposed change to policy WCS2 part b:</b></p> <p>"b) where they are located at the highest appropriate level of the geographic hierarchy and it is demonstrated that:</p> <p>v. in level 1a and level 2:</p> <ul style="list-style-type: none"> <li>the <b>impact of emissions</b> will be the same as or less than a thermal treatment facility with a throughput of 250,000 tpa and a stack height of 80 metres (as assessed in the Waste Core Strategy Habitats Regulations Assessment).</li> </ul> <p>vi. in level 1b:</p> <ul style="list-style-type: none"> <li>the <b>impact of emissions</b> will be the same as or less than a thermal treatment facility with a throughput of 150,000 tpa and a stack height of 80 metres (as assessed in the Waste Core Strategy Habitats Regulations Assessment)." </li></ul>	<p>Change proposed in response to <b>1679/49 e</b>.</p> <p>Axis (on behalf of Mercia Waste Management) have been contacted to discuss the proposed changes.</p>
<p><b>Proposed change to policy WCS2 final paragraph:</b></p> <p>" 'Other recovery' facilities will not be permitted in levels 3, 4 or 5 unless <del>exceptional circumstances are clearly demonstrated</del> it is demonstrated that the benefits of the development in the proposed location clearly outweigh any unacceptable adverse impacts on local amenity."</p>	<p>Change proposed in response to <b>1679/49 i</b>.</p> <p>Axis (on behalf of Mercia Waste Management) have been contacted to discuss the proposed changes.</p>
<p><b>Proposed change to policy WCS 3: Landfill and Disposal, part b) ii.:</b></p> <p>"a restoration scheme <b>which contributes positively to the objectives of the development plan</b>, with details of aftercare for a minimum period of 5 years."</p> <p>And <b>Paragraph 3.29</b></p> <p>"All proposals for new landfill capacity need to consider the whole life of the landfill site, from engineering through to restoration. The restoration of landfill sites can provide opportunities to create new or enhance existing habitats and provide valuable open space for communities or recreational facilities and should maximise the opportunities to do so. The restoration scheme should be developed taking into account the considerations in Policy WCS 7, and the objectives of relevant city, borough, district, parish and neighbourhood plans."</p>	<p>Change proposed in response to <b>1733/45 d</b>.</p> <p>This will ensure that restoration schemes are in accordance with the Waste Core Strategy, City, Borough and District Core Strategies and parish and neighbourhood plans. This would take into account the protection and enhancement of the local environment, but also allow some flexibility for other schemes which have recreation or other benefits.</p> <p>The Environment Agency have been contacted to discuss the proposed changes.</p>



Change	Reason
<p><b>Proposed change to paragraph 3.24:</b></p> <p><i>"Excavation activities, a normal part of the construction process, can result in considerable arisings of subsoils. It is possible that proposals may be made for schemes which use waste materials, such as subsoil, for other purposes akin to landfill such as flood management schemes, landscaping or noise mounds. These can be used for landscaping levelling of sites, the construction of bunds, embankments or features for noise attenuation, or other purposes. Proposals for this type of development will be considered against <del>this policy</del> Policy WCS3: Landfill and disposal."</i></p>	<p>Change proposed in response to 1727/31, 1728/32, 1729/33, 1644/51, 1761/55, 1760/56, 1759/57, 1758/58, 1757/59, 1756/60, 1754/62, 1750/66, 1749/67, 1748/68, 1747/69, 1740/70, 1746/71, 1745/72, 1744/73, 1743/74, 1742/75, 1741/76, 1739/77, 1738/78, 1737/79, 1650/88, 1644/89, 1640/24, 1679/49 g,</p>
<b>4. Location of new waste management development</b>	
<p><b>Proposed change to paragraph 4.9:</b></p> <p><i>"All developments must take into account local movement and transportation policies in the adopted Local Transport Plan, Local Plans and Local Development Frameworks. <del>They and</del> should aim to minimise the impact of the development by reducing the need for visitors and the workforce to travel <del>and the need to transport waste</del>. These measures can increase the energy efficiency and reduce greenhouse gas emissions associated with the waste management facility."</i></p>	<p>In response to Sustainability Appraisal table 8.3 'Mitigation recommendations' and representation 717/52 c.</p> <p>Natural England have been contacted to discuss the proposed changes.</p>
<b>5. Ensuring sustainable waste management development</b>	
<p><b>Proposed change, insert new paragraph after 5.13</b></p> <p><i>"In order to remain safe and operational during flood events, waste management facilities should be designed to ensure that materials are stored in a way that would not result in pollution on-site during flooding, and would not allow materials to be washed away and result in pollution problems elsewhere. Safe access for vehicles and pedestrians to the development in the event of flooding should also be considered."</i></p>	<p>Change proposed in response to 1733/45 c.</p> <p>The Environment Agency have been contacted to discuss the proposed changes.</p>
<p><b>Proposed change to paragraph 5.14</b></p> <p><i>"New development can avoid increasing flood risk on the site and elsewhere by incorporating sustainable drainage systems (SuDS)<sup>75</sup>, such as green roofs and permeable car parks, that can cope with high levels of rainfall and improve attenuation of run-off <del>and do not result in either deterioration in water quality or pollution being discharged into local watercourses</del>. There should be no net reduction in flood storage areas and</i></p>	<p>Change proposed in response to 1733/45 c.</p> <p>The Environment Agency have been contacted to discuss the proposed changes.</p>

Change	Reason
<i>development should not impede flood flow routes."</i>	
<p><b>Proposed change to paragraph 5.27</b></p> <p><i>"Design and construction of new buildings where the re-use of existing buildings is not appropriate and any alterations to existing buildings should consider resource efficiency. Minimising the use of virgin materials could be done in part by re-using materials or using recycled materials where appropriate. <b>On-site recycling enables management of waste at source, reducing waste miles.</b>"</i></p>	<p>In response to Sustainability Appraisal table 8.3 'Mitigation recommendations' and representation <b>717/52 c</b>.</p> <p>Natural England have been contacted to discuss the proposed changes.</p>
<p><b>Proposed change to Policy WCS 7 c)</b></p> <p><i>"Proposals for waste management facilities:</i></p> <p><i>"c) will <u>not</u> be permitted where they will have a likely significant effect on Internationally designated sites, or an unacceptable adverse impact on International, National and Local designated sites, habitats, species and heritage assets. An assessment of likely impacts <b>from the facility and any associated transport on these features must take into account ..."</b></i></p>	<p>Change proposed in response to <b>1649/29</b> o for consistency with policy WCS11: Amenity</p>
<p><b>Proposed change to policy WCS 9 d)</b></p> <p><i>"all new built development or significant alterations to buildings which create a gross building footprint of 1000 square metres or more gaining at least 10%<sup>78</sup> of energy supply annually from on-site renewable sources. <b>Where it is demonstrated that this is not practicable, this should be achieved through off-site solutions;</b> and"</i></p>	<p>In response to <b>1679/49 f</b>.</p> <p>Axis (on behalf of Mercia Waste Management) have been contacted to discuss the proposed changes.</p>
<p><b>Proposed change to Paragraph 5.33:</b></p> <p><i>"The suitability <b>and viability</b> of particular methods will depend on the type of development and the proposed location. The design and operation of proposals for renewable energy provision should address potential amenity and environmental effects in line with the requirements of the Development Plan."</i></p>	<p>In response to <b>1679/49 f</b>.</p> <p>Axis (on behalf of Mercia Waste Management) have been contacted to discuss the proposed changes.</p>
<p><b>Proposed change to policy WCS10 part a</b></p> <p><i>"a) <b>protect and enhance</b> <del>take account of</del> local characteristics, through consideration of:..."</i></p>	<p>In response to Sustainability Appraisal table 8.3 'Mitigation recommendations' and representation <b>717/52 c</b>.</p> <p>Natural England have been contacted to discuss the proposed changes.</p>
<p><b>Proposed change to policy WCS10 part c</b></p> <p><i>"do not constitute inappropriate development in areas designated as Green Belt<sup>83</sup> <b>or where very special circumstances are</b></i></p>	<p>In response to <b>1679/49 g</b> and <b>1679/49 h</b>.</p> <p>Axis (on behalf of Mercia Waste Management) have</p>

Change	Reason
<i>demonstrated which justify such inappropriate development"</i>	been contacted to discuss the proposed changes.
<p><b>Proposed change to policy WCS11 final paragraph:</b></p> <p><del>"Where these are not demonstrated, exceptional circumstances must be clearly justified by the applicant.</del>  <i>Where these criteria are not met, waste management facilities will only be permitted where it is demonstrated that the benefits of the development in the proposed location clearly outweigh any unacceptable adverse impacts on local amenity."</i></p>	<p>In response to <b>1679/49 i.</b></p> <p>Axis (on behalf of Mercia Waste Management) have been contacted to discuss the proposed changes.</p>
<b>6. Safeguarding existing waste management facilities</b>	
<p><b>Proposed change to paragraph WCS 13: New development proposed on or near to existing waste management facilities</b></p> <p>Existing waste management facilities will be safeguarded from non waste-related uses.</p> <p>a) Development on or adjacent to a site with planning permission or existing use rights for waste management development will be permitted:</p> <ul style="list-style-type: none"> <li>i. where the proposed development does not prevent, hinder or unreasonably restrict the operation of the waste development; or</li> <li>ii. in cases where the proposed development could prevent, hinder or unreasonably restrict the operation of the waste development, where: <ul style="list-style-type: none"> <li>• It can be satisfactorily demonstrated that there is no longer a need for the permitted waste management operation; or</li> <li>• Suitable alternative provision is made for the waste operation at the same or higher level of the geographic hierarchy; <b>or</b></li> <li>• The impacts can be satisfactorily mitigated.</li> </ul> </li> </ul> <p>b) Development within 250 metres of a site with planning permission or existing use rights for waste management that would introduce a new sensitive receptor to the area will be permitted where it is demonstrated that the proposed development would not be unacceptably adversely affected by bio-aerosols or other emissions from the waste management operation.</p> <p>Where this is not the case the County Council will oppose proposals and will expect District Councils to refuse permission on the grounds that it would compromise the achievement of the Waste Core Strategy.</p>	<p>To amend an error made in the publication document.</p>

Change	Reason
Any mitigation required will be the responsibility of the developer of the new proposal <sup>2</sup> .	
<b>7. Considering waste from all new development</b>	
<p>Proposed change to policy WCS14:</p> <p><i>"Proposals for new development will be permitted where:</i></p> <p><i>a) they incorporate facilities into the design that allow occupiers to separate and store waste for recycling and recovery; or</i></p> <p><i>b) developer contributions are made, for proposals where this is more appropriate than provision of on-site facilities; or</i></p> <p><i>c) <b>where</b> the existing provision is adequate."</i></p>	Deletion of a repeated word.
<b>8. Implementation and monitoring framework</b>	
<p><b>Proposed change to paragraph 8.22</b></p> <p><i>"The reviewed Joint Municipal Waste Management Strategy (JMWMS) is <b>already</b> committed to achieving this target for <b>MSW household waste</b> and as such the likelihood of delivery is expected to be high. The <b>revised reviewed</b> JMWMS makes waste minimisation its priority and proposes to increase the % recycled through efficiencies, the adoption of joint collection and disposal systems and the development of new residual treatment processes. It does not identify the kind, number or location/s of facilities needed. The Waste Core Strategy would enable sites to be developed if necessary."</i></p>	For clarity and consistency with JMWMS.
<p><b>Proposed change to paragraph 8.27</b></p> <p><i>"8.27 The capacity gap and therefore the land requirements identified in <b>Table 3</b> and <b>Appendix 4</b> are based on the following assumptions:</i></p> <ul style="list-style-type: none"> <li><i>• <b>Estimates of projections based on the assumptions in Table 9.</b></i></li> </ul> <p><i>In practice however these projections are likely to be above actual levels of waste arisings. They are already higher than the figures for actual waste arisings for comparable years as set out in the Waste Data Interrogator (WDI). The WDI shows a 28% decrease in the amount of HCI waste managed in Worcestershire between 2007-2009 and a 21% decrease in waste managed in England over the same period.</i></p> <p><i>The projections make no allowance for the possibility that fiscal and regulatory policies and national and local initiatives will themselves foster more efficient industrial</i></p>	<p>In response to <b>681/48 c</b></p> <p>Malvern Hills District Council have been contacted to discuss the proposed changes.</p>

<sup>2</sup> Provided that the operator is operating within the terms of the planning permission(s) and licensing permits for the site.

Change	Reason
<p><i>practices and further reductions in waste production. In the short term at least the current economic downturn has already led to reduced output and it is possible that both will remain lower for some years to come.</i></p> <p><i>The projections of MSW, clinical waste and C&amp;D waste arisings are based on household growth targets set out in the proposed RSS phase two revision. However the proposed revision has not been adopted and the Secretary of State has expressed his intention to revoke the existing RSS. At the time of publication the only planning authority in Worcestershire with an adopted Core Strategy is Wyre Forest District Council and several local planning authorities across Worcestershire have yet to locally determine future housing and employment provision. This will need to be monitored and any impacts on the projections and the deliverability of the Waste Core Strategy will be considered in the Annual Monitoring Report.</i></p> <ul style="list-style-type: none"> <li>• <b>All existing facilities will continue to operate at their current capacity<sup>98</sup> and increased capacity will be realised through new facilities:</b> This is important as it allows for adequate capacity to be planned for, however in practice it is very possible that some additional capacity will be provided through the intensification of existing sites..."</li> </ul>	
<p><b>Proposed change to Paragraph 8.39</b></p> <p>"8.39 <i>In Worcestershire many existing waste management operations currently take place on industrial estates. <b>This trend and the findings of the Industrial Estates Study indicate that this element of the Waste Core Strategy will be deliverable. However at the time of publication local planning authorities across Worcestershire, with the exception of Wyre Forest, have yet to locally determine future provision of employment provision. Development plan documents will need to be monitored as they emerge, to ensure that the Waste Core Strategy remains deliverable in the medium to long-term.</b></i>"</p>	<p>In response to <b>681/48 c</b></p> <p>Malvern Hills District Council have been contacted to discuss the proposed changes.</p>
<p><b>Appendices</b></p>	
<p>In order to avoid future confusion postcode details will be added to all areas of search listed in Annex A.</p>	<p>Change proposed in order to provide clarity and avoid confusion (see response to <b>667/14</b>).</p>

Change	Reason
<b>General changes</b>	
Photographs of other waste management facilities in Worcestershire to be included.	In response to <b>1632/83a</b>
<b>Maps</b> Changes need to be made to all the maps and plans in the final document to show the latest OS wording. The layers/themes on Arcview showing Rivers are incorrect; some rivers are shown as canals. (E.g. Fig 15 Leigh Brook and River near Bromsberrow) Layers need changing and new maps to be produced.	To update data and reflect changes to copyright.





## Addendum 20<sup>th</sup> June

Respondent	Representation	Verbatim comment	Action
<b>593/93</b> Ms B Meddings Hindlip, Martin Hussingtree and Salwarpe Parish Council	<b>Part:</b> Areas of Search  <b>Legally compliant:</b> Not answered  <b>Sound:</b> Not answered	<p>Areas of Search - Identification of land potentially suitable for waste management.</p> <p>Specifically Sites 2 and 1 at Shires Business Park, City of Worcester.</p> <p>The Parish Council has particular concerns on the impact of identified sites on its parish of Hindlip that will adversely impact on the rural countryside adjacent to Sites 5 and 4 on the linked Warndon and Berkely Business Parks.</p> <p><b>Hindlip parish is within the Green Belt.</b></p> <p>1) Immediately adjacent the identified sites are located extensive sports and recreational facilities of Worcester Rugby Club at Sixways in addition to amateur youth pitches at Offerton Lane. Along with farm pasturelands in open countryside that include Listed buildings and others of historic importance to the area.</p>	<p><b>No changes proposed.</b></p> <p>The status of the Areas of Search has changed following the <i>First Draft Submission Consultation</i>. In the <i>Publication Document</i> they are now used to assess whether it is likely that adequate suitable land would be available to deliver the strategy. The Areas of Search have been subject to a preliminary high-level assessment but <i>The Waste Core Strategy Publication Document</i> does not seek to direct new development to these areas specifically.</p> <p>It is noted that Hindlip Parish is in the greenbelt, however the Industrial Estates referred to are neither in the greenbelt nor Hindlip Parish.</p> <p>Policy WCS 10 seeks to protect local characteristics. We intend to proposed changes to reinforce this:</p> <p>"a) <b>protect and enhance</b> <del>take account of</del> local characteristics, through consideration of:..."</p> <p>(See representation <b>717/52 c</b>)</p> <p>Listed buildings and other heritage assets are protected through Policy WCS7.</p> <p>Policy WCS 11 considers potential impacts on amenity, including health and air quality.</p>



Respondent	Representation	Verbatim comment	Action
		Strong concerns are expressed on adverse impacts upon the health and air quality of these local recreational amenities by cumulative effects of fumes, dust and odours.	
		(2) There is potential damage or soiling to the facades of the Listed heritage building of Hindlip Hall with its historic parkland forming the Headquarters of West Mercia Police Authority.	Listed buildings and other heritage assets are protected through Policy WCS7.
		(3) Affects are envisaged on the integrity and amenities of the associated local road network and the ensuing traffic movements with their connections to the strategic highways network to and from Junction 6 of the M5 Motorway.  In considering the Waste Core Strategy as part of the Development Plan it is important that any identified sites do not compromise the local characteristics and distinctive cultural assets of the adjoining historic parish of Hindlip..	Policy WCS 6 requires safe and adequate pedestrian and vehicular access to support proposed waste management facilities. Policy WCS 11 considers the potential impacts from "associated transport" on amenity.