

Worcestershire Waste Core Strategy

Representations received to

Publication Document (Regulation 27) consultation

March to May 2011

1761/155

Mr N Dean
Planning Economy and Performance
Worcestershire County Council
County Hall
Spetchley Road
Worcester
WR5 2NP



ME
1. SNOWBERRY CLOSE
LICKHILL
STOURPORT-ON-AVON
25TH APRIL 2011
WORCS

Dear Mr Dean

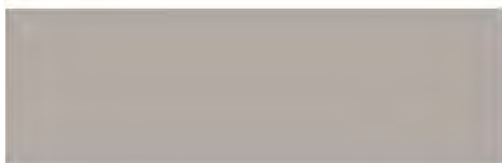
RESPONSE TO WORCESTERSHIRE COUNTY COUNCIL WASTE CORE STRATEGY DOCUMENT

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I feel that the Waste Core Strategy is not sound and have great concerns over its implementation.

Yours sincerely



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County Hall
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1760/9256
THE SANCTUARY
7, THE ACRE,
DEFFORD
WR8 9BZ

25TH APRIL 2011

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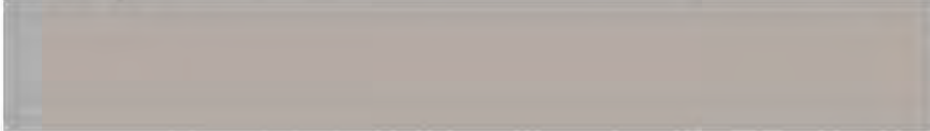
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1759/0357
Mr N D Jukes.
115 HARBURY ROAD
KIDDERMINSTER
WORES.
DY11 5AW.

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1758/458

St Martin
Old Leicester Rd
Huntingdon DY11 7XG

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1757/459
ST. MARTINS
OLD WORCESTER RD.
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DY11 7XQ

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1756/46 60
Mrs T Walkden
79 Waresley Park
Hartlebury
DY11 7XF

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1755/61
14 Tunnel Hill
Worcester
WR3 8QJ

3rd May 2011

Mr N Dean
Planning, Economy and Performance
Worcestershire County Council
County Hall
Spetchley Road
Worcester
WR5 2NP



Dear Mr Dean

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.

Yours sincerely

A rectangular grey box used to redact the signature of Neil Laurenson.

Neil Laurenson

Mr N Dean
Planning Economy and Performance
Worcestershire County Council
County Hall
Spetchley Road
Worcester
WR5 2NP



1754/4862

S. Derricutt
77 Waresley Park
Hartlebury
NR KIDDERMINSTER
WORCS. DY11 7XF

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1753/1753
MR & MRS G.R. KNOWLES,
62, WARELEY PARK,
HARTLEBURY,
63 NR KIDDERMINSTER,
WORCS
DY11 7XE

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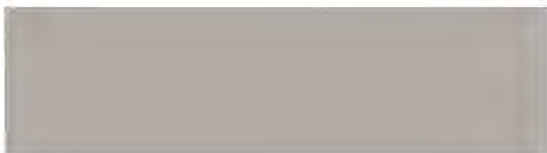
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1752/564
72, WARELEY PARK

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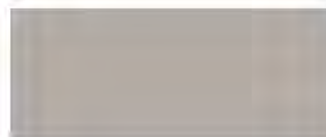
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A grey rectangular box used to redact the signature of the sender.

Mr N Dean
Planning Economy and Performance
Worcestershire County Council
County Hall
Spetchley Road
Worcester
WR5 2NP



25TH APRIL 2011

Dear Mr Dean

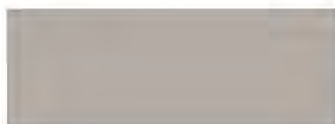
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1750/8866
1) FLEW BERRY CLOSE
LICKHILL
STOURPORT.
WORCS
DY138TF.

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174CV/5867
67, WARELEY PARK,
HARTHERBURY,
NR KIDDERMINSTER
WORS.
DY117KF.
25TH APRIL 2011

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67, WARESLEY PARK
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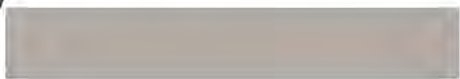
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1740/5670

32 Waresley Park
Hartlebury
WORCS
DY11 7XE

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1744/5873
66 Waresley PK
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DY11 7XE

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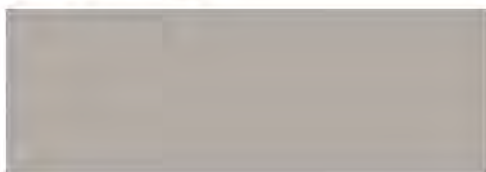
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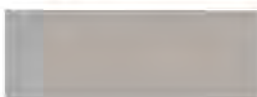
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Yours sincerely



Mr N Dean
Planning Economy and Performance
Worcestershire County Council
County Hall
Spetchley Road
Worcester
WR5 2NP



1739 / 0377
32 Warsley Park
Hartlebury
Worcs
DY11 7XE

25TH APRIL 2011

Dear Mr Dean

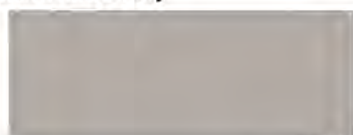
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Sophie Brookes

line 130
Mr N Dean
Planning Economy and Performance
Worcestershire County Council
County Hall
Spetchley Road
Worcester
WR5 2NP



1738/1478

32 Waverley Park
Hartlebury
Dy 11 7XE.
WORCS

26/04/2011

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Yours sincerely



ANDREW BROOKES

Mr N Dean
Planning Economy and Performance
Worcestershire County Council
County Hall
Spetchley Road
Worcester
WR5 2NP



1737/6579
Rangsiya Wrench
44 Round Hill Wharf
Kidderminster
Worcs
DY11 6US

29TH APRIL 2011

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A rectangular area where the signature of Rangsiya Wrench has been redacted with a solid grey box.

Rangsiya Wrench

1736/6680

Mr N Dean
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Worcestershire County Council
County Hall
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Worcester
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24 Round Hill Wharf
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DY11 6US

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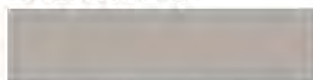
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Michael Wrench

1735/16781



38 Waresley Park
Hartlebury
Worcs. DY11 7XE
2 May 2011

Mr Nicholas Dean
Planning Economy and Performance
Worcestershire County Council
County Hall, Spetchley Road
Worcester WR5 2NP

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Green belt

The Waste Core strategy seems to make **selective provision** for protection of the Green Belt, offering no protection to the local area or amenity.

- 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.
- Livestock is farmed, as well as high grade, high intensity arable farming.
- 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.
- Perception alone could be economically detrimental to local farms, and therefore the local economy.
- 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.
- **Sustainability** should also refer to the local production of good quality food . The WCS seems to also over look this very important point.

Noise mitigation

- 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.
- Reference is made to the construction of bunds, embankments, and features for noise attenuation and landscaping for noise mounds.
- 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.

Consultation

- 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 community views have shaped the WCS

It is with regret that for all the concerns raised we conclude that the **Waste Core Strategy proposed by Worcestershire County Council is not sound.**

Yours sincerely



Trevor Mackender

✓ 82
1734/68

Worcestershire County Council Waste Core Strategy

Development Plan Document: Publication Document Consultation (Regulation 27) Response Form

Please return to: Minerals and Waste Policy, Planning Environment and Economy, County Hall,
Spetchley Road, Worcester, WR5 2NP

22nd March 2010 to 5.30pm on Wednesday 4th May 2010



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1. Who are you?

Title MR First name: MATTHEW Last name: GREATBATCH

Organisation (where relevant): _____

Job title (where relevant): student

Address: FORGE HOUSE.

OLD FORGE GARDENS, INN LANE.

HARTLEBURY

Post code: DY11 7TA

Telephone number: _____

Email address: _____

Part B: Your representation

Please use a separate sheet for each representation

For office use only. Ref:

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Name or Organisation _____ Representation ____ of ____

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If you wish to make representations on more than one aspect of the Waste Core Strategy please complete a separate form for each.

Paragraph number: WCS1
Policy number: _____
Other (eg table, figure) _____

Sustainability Appraisal: _____
Habitats Reg. Assessment: _____

3. Do you consider that the Waste Core Strategy is:

a) Legally compliant? Yes ☒ No ☐
b) Sound? Yes ☐ No ☒ (also answer Q4)

If you think the identified part of the Waste Core Strategy is not legally compliant and is unsound and therefore want to answer 'No' to both parts of this question, please fill in two separate forms, indicating which representation relates to legal compliance and which relates to soundness.

Please refer to the guidance notes for details of what is meant by 'legally compliant' and 'sound'.

4. If you consider the DPD is unsound please specify why:

a) It is not justified
b) It is not effective
c) It is not consistent with national policy

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Please refer to the attached guidance notes for details of each of these 'tests of soundness'.

5. Please give details of why you consider that the Waste Core Strategy is/is not legally compliant or is unsound.

If appropriate give details of any changes that you think could address this.

Please refer to the attached guidance notes for details of the information you should include in this section.

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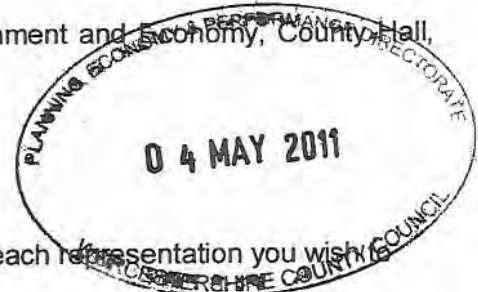
Please continue on separate sheet(s) if necessary, headed with your name/organisation number and the representation which it relates to (ie representation ____ of ____).

1632/83

**Worcestershire County Council Waste Core Strategy
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1. Who are you?

Title MR. First name: MIKE Last name: NATTRASS

Organisation (where relevant): _____

Job title (where relevant): MEMBER OF THE EUROPEAN PARLIAMENT

Address: 123 NEW JOHN ST.
BIRMINGHAM

Post code: B6 4LD

Telephone number: 0121 333 7787

Email address: _____

Part B: Your representation

Please use a separate sheet for each representation

For office use only. Ref:

Your representation should cover all of the evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage. After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation MIKE NITTRASS MEP Representation 1 of 2

2. To which part of the Waste Core Strategy does this representation relate?
If you wish to make representations on more than one aspect of the Waste Core Strategy please complete a separate form for each.

Paragraph number: 5.45 ff. Sustainability Appraisal:
Policy number: Habitats Reg. Assessment:
Other (eg table, figure)

3. Do you consider that the Waste Core Strategy is:

a) Legally compliant?	Yes ☒	No ☐
b) Sound?	Yes ☐	No ☒ (also answer Q4)

If you think the identified part of the Waste Core Strategy is not legally compliant and is unsound and therefore want to answer 'No' to both parts of this question, please fill in two separate forms, indicating which representation relates to legal compliance and which relates to soundness.

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If appropriate give details of any changes that you think could address this.

Please refer to the attached guidance notes for details of the information you should include in this section.

PLEASE SEE ATTACHED DOCUMENT 1.

Please continue on separate sheet(s) if necessary, headed with your name/organisation number and the representation which it relates to (ie representation of).

A Representation by Mike Nattrass MEP

relating to

the Worcestershire County Council Waste Core Strategy

I consider the WCS to be **UNSOUND** for the following reason:

CONSULTATION

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.

Part B: Your representation

Please use a separate sheet for each representation

For office use only. Ref:

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Name or Organisation MIKE NATTRASS MEP Representation 2 of 2

2. To which part of the Waste Core Strategy does this representation relate?
If you wish to make representations on more than one aspect of the Waste Core Strategy please complete a separate form for each.

Paragraph number: 5.60 Sustainability Appraisal:
Policy number: Habitats Reg. Assessment:
Other (eg table, figure)

3. Do you consider that the Waste Core Strategy is:

a) Legally compliant? Yes ☒ No ☐
b) Sound? Yes ☐ No ☒ (also answer Q4)

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c) It is not consistent with national policy ☐

Please refer to the attached guidance notes for details of each of these 'tests of soundness'.

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PLEASE SEE ATTACHED DOCUMENT 2.

Please continue on separate sheet(s) if necessary, headed with your name/organisation number and the representation which it relates to (ie representation of).

A Representation by Mike Nattrass MEP

relating to

the Worcestershire County Council Waste Core Strategy

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 circumstances exist which would allow such a development.

This language is couched in the imperative.

However:

- i. No definition of 'very exceptional circumstances' is given.
Without such a definition, it becomes impossible to quantify, to rationalise or indeed to challenge the circumstances of a proposed development in the Green Belt.
- 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 contractor be so minded.

- iii. On Page 34 'Managing Waste as a Resource':
The picture above Policy 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 proposed 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.

1664/2084

**Worcestershire County Council Waste Core Strategy
Development Plan Document:
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1. Who are you?

Title MRS First name: CHRISTINE Last name: GREATBATCH

Organisation (where relevant): _____

Job title (where relevant): _____

Address: FORGE HOUSE

OLD FORGE GARDENS INN LANG

HARTLEBURY

Post code: DY11 7TA

Telephone number: _____

Email address: _____

Part B: Your representation

Please use a separate sheet for each representation

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Other (eg table, figure) _____

Sustainability Appraisal: _____
Habitats Reg. Assessment: _____

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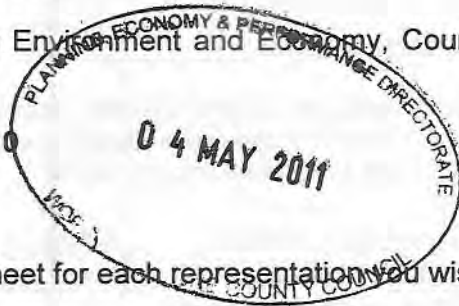
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1664/1785

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1. Who are you?

Title MR First name: CHRISTOPHER Last name: GREATBATCH

Organisation (where relevant): _____

Job title (where relevant): _____

Address: FORGE HOUSE

OLD FORGE GARDENS, INN LAKE
HARTHEBURY

Post code: DY11 7TA

Telephone number: _____

Email address: _____

Part B: Your representation

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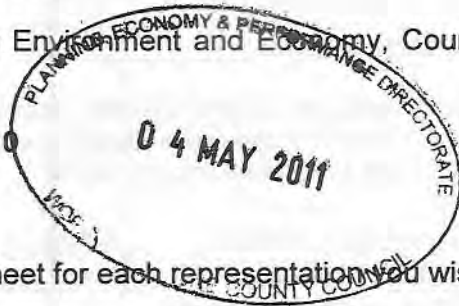
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Organisation (where relevant): _____

Job title (where relevant): _____

Address: FORGE HOUSE

OLD FORGE GARDENS, INN LAKE
HARTHEBURY

Post code: DY11 7TA

Telephone number: _____

Email address: _____

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Please continue on separate sheet(s) if necessary, headed with your name/organisation number and the representation which it relates to (ie representation ____ of ____).



1661/7886

38 Waresley Park
Hartlebury
Worcs. DY11 7XE
2 May 2011

Mr Nicholas Dean
Planning Economy and Performance
Worcestershire County Council
County Hall, Spetchley Road
Worcester WR5 2NP

Dear Mr Dean,

RESPONSE TO WORCESTERSHIRE COUNTY COUNCIL WASTE CORE STRATEGY DOCUMENT.

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.

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.

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 effects on employment or bring economical benefits to the county. The reverse to all these may be true.

Objectives of the Waste Core strategy ' TO REDUCE GREEN HOUSE EMISSIONS, SUSTAINABLE DEVELOPMENT AND DRIVE WASTE UP THE HIERARCHY.'

Carbon Emissions

- 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.
- Increased waste miles will add to the carbon footprint, (some waste will travel 70 miles.)
- 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.
- 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.

Energy recovery

- Paragraph 3.20 refers to incineration without energy recovery. Why is this?
- 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

- 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.
- 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.
- Wychavon District Council does not consider incineration of waste to be renewable energy.

Waste Arisings

- 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.
- Autoclaving and Anerobic 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.
- Paragraph 1.8, states that **predicted waste arisings are based on the best available data**. As waste is falling everywhere else, it is difficult to understand the assumption that waste will increase so dramatically in the coming years when it has also fallen consistently in Worcestershire, and Herefordshire. How accurate is the data?
- 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?
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- 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.

The claim 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.

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EXTENDING EXISTING SEWERS

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- 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?

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The Waste Core strategy seems to make **selective provision** for protection of the Green Belt, offering no protection to the local area or amenity.

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- **Sustainability** should also refer to the local production of good quality food . The WCS seems to also over look this very important point.

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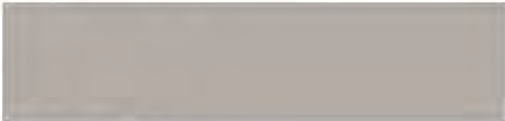
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- This is clearly recognition that the incinerator will have a noise impact on the surrounding area. This will not protect amenity, and will adversely affect private property also.

Consultation

- 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 community views have shaped the WCS

It is with regret that for all the concerns raised we conclude that the **Waste Core Strategy proposed by Worcestershire County Council is not sound.**

Yours sincerely



Sharon Cook

Mr N Dean
Planning Economy and Performance
Worcestershire County Council
County Hall
Spetchley Road
Worcester
WR5 2NP



1645/73 37

32 Waresley Pate
Hartlebury
WORCS
DY11 7XB.

26/04/2011

Dear Mr Dean

RESPONSE TO WORCESTERSHIRE COUNTY COUNCIL WASTE CORE STRATEGY DOCUMENT.

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.

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 eg regarding landfill use.

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.

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 effects on employment or bring economical benefits to the county. The reverse to all these may be true.

Objectives of the Waste Core strategy ' TO REDUCE GREEN HOUSE EMISSIONS, SUSTAINABLE DEVELOPMENT AND DRIVE WASTE UP THE HIERARCHY.'

Carbon Emissions

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.

- Increased waste miles will add to the carbon footprint, (some waste will travel 70 miles.)
- 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.
- 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.

Energy recovery

- **Paragraph 3.20 refers to incineration without energy recovery. Why is this?**
- 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
- 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.
- 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.
- Wychavon District Council does not consider incineration of waste to be renewable energy.

Waste Arisings

- 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.
- 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.
- 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?**
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The claim that no new landfill capacity 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.

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- 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.
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Consultation

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Yours sincerely



(L BROOKES)

1650/ ~~74~~ 88

Mr N Dean
Planning Economy and Performance
Worcestershire County Council
County Hall
Spetchley Road
Worcester
WR5 2NP



St Martins
Old Worcester Rd
Hartlebury
DY11 7XQ

25TH APRIL 2011

Dear Mr Dean

RESPONSE TO WORCESTERSHIRE COUNTY COUNCIL WASTE CORE STRATEGY DOCUMENT

I wish to respond to the above. Your on line 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.

- I am concerned at the timing of the consultation, as 3 weeks of this period are over Easter and the Royal wedding, when many people are away. I am not confident that community views have shaped the Waste Core Strategy.
- 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?
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- 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.

I feel that the Waste Core Strategy is not sound and have great concerns over its implementation.

Yours sincerely



1644/32 89

Mr N Dean
Planning Economy and Performance
Worcestershire County Council
County Hall
Spetchley Road
Worcester
WR5 2NP



Mrs J Hemmings
60 Waresley Park
Hartlebury
Kidderminster
Worcestershire
DY11 7XE



25TH APRIL 2011

Dear Mr Dean

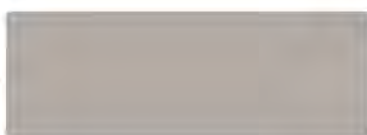
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I feel that the Waste Core Strategy is not sound and have great concerns over its implementation.

Yours sincerely



Joynes, Marianne (PEP, Planning, Policy)

571
L 569/90

From: Elmleylovettpc@aol.com
Sent: 20 May 2011 18:58
To: WCS (PEP)
Cc: [REDACTED]
Subject: Waste core strategy consultation
Attachments: ELMLEYLOVETTPARISHCOUNCIL.docx

I am contacting you as we haven't yet received acknowledgement of our submission of comments to the above consultation. Our comments were posted on Thursday 28th April and should have reached you before the deadline of 4th May.

I have attached an electronic copy of the document for your information.

Regards

Susanna Taylor
Clerk to Elmley Lovett Parish Council



ELMLEY LOVETT PARISH COUNCIL (This one)

RESPONSE TO WORCESTERSHIRE COUNTY COUNCIL WASTE CORE STRATEGY DOCUMENT.

Possible objections

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.

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.

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It is regret that for all the concerns raised we conclude that the **Waste Core Strategy** proposed by **Worcestershire County Council** is not sound.

**Worcestershire County Council Waste Core Strategy
Development Plan Document:
Publication Document Consultation (Regulation 27)
Response Form**

Please return to: Minerals and Waste Policy, Planning Environment and Economy, County Hall,
Spetchley Road, Worcester, WR5 2NP

22nd March 2010 to 5.30pm on Wednesday 4th May 2010



This form has two parts:

Part A: Your details

Part B: Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part C: About You. This section is for monitoring purposes only. It will be removed from the representation form and analysed separately.

The representations on the Waste Core Strategy and Sustainability Appraisal documents will be considered alongside the submitted Waste Core Strategy documents, which will be examined by a Planning Inspector. The purpose of the examination is to consider whether the Waste Core Strategy complies with the legal requirements and is 'sound'.

A set of guidance notes is available to help you complete this form.

Part A: Your details

For office use only. Ref:

LS65/91

It is not possible for representations to be considered anonymously. Respondents should also note that representations will not be confidential and that they will be published on the Council's web-site and copies will be placed at appropriate venues across the county for public inspection.

Where there are groups who share a common view on how they wish to see the WCS changed, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send in separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

1. Who are you?

Title MR First name: JONATHAN Last name: PEW

Organisation (where relevant): EARLS CROOME PARISH COUNCIL

Job title (where relevant): _____

Address: CHURCH LANE EARLS CROOME
WORCESTERSHIRE

Post code: WR89DE

Telephone number: [REDACTED]

Email address: _____

Part B: Your representation

Please use a separate sheet for each representation

For office use only. Ref:

Your representation should cover all of the evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage. After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation EARLS CRBONE Representation 1 of 1

2. To which part of the Waste Core Strategy does this representation relate?
If you wish to make representations on more than one aspect of the Waste Core Strategy please complete a separate form for each.

Paragraph number: _____

Policy number: _____

Other (eg table, figure) _____

Sustainability Appraisal: _____

Habitats Reg. Assessment: _____

3. Do you consider that the Waste Core Strategy is:

a) Legally compliant?

Yes

☒

No

☐

b) Sound?

Yes

☒

No

☐

(also answer Q4)

If you think the identified part of the Waste Core Strategy is not legally compliant and is unsound and therefore want to answer 'No' to both parts of this question, please fill in two separate forms, indicating which representation relates to legal compliance and which relates to soundness.

Please refer to the guidance notes for details of what is meant by 'legally compliant' and 'sound'.

4. If you consider the DPD is unsound please specify why:

a) It is not justified

☐

b) It is not effective

☐

c) It is not consistent with national policy

☐

Please refer to the attached guidance notes for details of each of these 'tests of soundness'.

5. Please give details of why you consider that the Waste Core Strategy is/is not legally compliant or is unsound.
If appropriate give details of any changes that you think could address this.

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Please continue on separate sheet(s) if necessary, headed with your name/organisation number and the representation which it relates to (ie representation ____ of ____).



**BNP PARIBAS
REAL ESTATE**

176 45 / 92

PRIVATE AND CONFIDENTIAL

Minerals and Waste Policies
County Hall
Spechley Road
Worcester
WR5 2NP

Charles Robinson
BNP Paribas Real Estate
9 Colmore Row
Birmingham B3 2BJ

Tel: +44 (0) 121 237 1216
Switchboard: +44 (0) 121 237 1200
Fax: +44 (0) 121 237 1222
Email: charles.robinson@bnpparibas.com

Our ref: CNR/lc/

06 May 2011

Dear Sir/Madam

Re: Worcestershire County Waste Core Strategy, Development Plan Document: Public Consultation Response

I write with reference to the above and enclose herewith four representations. I acknowledge that the closing date was Wednesday 4th May but trust that you will still accept these representations, which are brief and, it is hoped, helpful.

I look forward to hearing from you.

Yours faithfully,

**Charles Robinson
Director**



**Worcestershire County Council Waste Core Strategy
Development Plan Document:
Publication Document Consultation (Regulation 27)
Response Form**

Please return to: Minerals and Waste Policy, Planning Environment and Economy, County Hall, Spetchley Road, Worcester, WR5 2NP

22nd March 2010 to 5.30pm on Wednesday 4th May 2010

This form has two parts:

Part A: Your details

Part B: Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part C: About You. This section is for monitoring purposes only. It will be removed from the representation form and analysed separately.

The representations on the Waste Core Strategy and Sustainability Appraisal documents will be considered alongside the submitted Waste Core Strategy documents, which will be examined by a Planning Inspector. The purpose of the examination is to consider whether the Waste Core Strategy complies with the legal requirements and is 'sound'.

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Part A: Your details

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It is not possible for representations to be considered anonymously. Respondents should also note that representations will not be confidential and that they will be published on the Council's web-site and copies will be placed at appropriate venues across the county for public inspection.

Where there are groups who share a common view on how they wish to see the WCS changed, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send in separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

1. Who are you?

Title MR First name: Charles Last name: Robinson

Organisation (where relevant): BNP Paribas Real Estate

Job title (where relevant): Director

Address: 9 Colmore Row
Birmingham

Post code: B3 2BJ

Telephone number: 0121 237 1216

Email address: charles.robinson @ bnpparibas.com

Part B: Your representation

Please use a separate sheet for each representation

For office use only. Ref:

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Name or Organisation BN P Paribas Real Estate Representation 1 of 4

2. To which part of the Waste Core Strategy does this representation relate?
If you wish to make representations on more than one aspect of the Waste Core Strategy please complete a separate form for each.

Paragraph number:

Policy number:

Other (eg table, figure)

WCS 1 + 2

Sustainability Appraisal:

Habitats Reg. Assessment:

3. Do you consider that the Waste Core Strategy is:

a) Legally compliant?

Yes

☒

No

☐

b) Sound?

Yes

☐

No

☒

(also answer Q4)

If you think the identified part of the Waste Core Strategy is not legally compliant and is unsound and therefore want to answer 'No' to both parts of this question, please fill in two separate forms, indicating which representation relates to legal compliance and which relates to soundness.

Please refer to the guidance notes for details of what is meant by 'legally complaint' and 'sound'.

4. If you consider the DPD is unsound please specify why:

a) It is not justified

☐

b) It is not effective

☐

c) It is not consistent with national policy

☒

Please refer to the attached guidance notes for details of each of these 'tests of soundness'.

5. Please give details of why you consider that the Waste Core Strategy is/is not legally compliant or is unsound.

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Please see attached sheet.

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**Worcestershire County Council Waste Core Strategy
Development Plan Document
Representation 1 of 4 – BNP Paribas Real Estate**

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). 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.

Worcestershire County Council Waste Core Strategy Development Plan Document: Publication Document Consultation (Regulation 27) Response Form

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22nd March 2010 to 5.30pm on Wednesday 4th May 2010

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Where there are groups who share a common view on how they wish to see the WCS changed, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send in separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

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Post code: B3 2BJ

Telephone number: 0121 237 1216

Email address: charles.robinson @ bnpparibas.com

Part B: Your representation

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For office use only. Ref:

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Name or Organisation BN P Paribas Real Estate Representation 2 of 4

2. To which part of the Waste Core Strategy does this representation relate?
If you wish to make representations on more than one aspect of the Waste Core Strategy please complete a separate form for each.

Paragraph number:

Policy number:

Other (eg table, figure) WCS 4
(Table 4)

Sustainability Appraisal:

Habitats Reg. Assessment:

3. Do you consider that the Waste Core Strategy is:

a) Legally compliant?

Yes

☒

No

☐

b) Sound?

Yes

☐

No

☒

(also answer Q4)

If you think the identified part of the Waste Core Strategy is not legally compliant and is unsound and therefore want to answer 'No' to both parts of this question, please fill in two separate forms, indicating which representation relates to legal compliance and which relates to soundness.

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4. If you consider the DPD is unsound please specify why:

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☐

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Please see additional sheet.

Please continue on separate sheet(s) if necessary, headed with your name/organisation number and the representation which it relates to (ie representation of).



**Worcestershire County Council Waste Core Strategy
Development Plan Document
Representation 2 of 4 – BNP Paribas Real Estate**

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 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".

Worcestershire County Council Waste Core Strategy Development Plan Document: Publication Document Consultation (Regulation 27) Response Form

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Name or Organisation BNP Paribas Real Estate Representation 3 of 4

2. To which part of the Waste Core Strategy does this representation relate?
If you wish to make representations on more than one aspect of the Waste Core Strategy please complete a separate form for each.

Paragraph number:

8.42

Sustainability Appraisal:

Policy number:

Habitats Reg. Assessment:

Other (eg table, figure)

3. Do you consider that the Waste Core Strategy is:

a) Legally compliant?

Yes ☐

No ☐

b) Sound?

Yes ☐

No ☐ (also answer Q4)

If you think the identified part of the Waste Core Strategy is not legally compliant and is unsound and therefore want to answer 'No' to both parts of this question, please fill in two separate forms, indicating which representation relates to legal compliance and which relates to soundness.

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Please see separate sheet.

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**BNP PARIBAS
REAL ESTATE**

**Worcestershire County Council Waste Core Strategy
Development Plan Document
Representation 3 of 4 – BNP Paribas Real Estate**

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.

Worcestershire County Council Waste Core Strategy Development Plan Document: Publication Document Consultation (Regulation 27) Response Form

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Telephone number: 0121 237 1216

Email address: charles.robinson @ bnpparibas.com

Part B: Your representation

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Name or Organisation BNP Paribas Real Estate Representation 4 of 4

2. To which part of the Waste Core Strategy does this representation relate?
If you wish to make representations on more than one aspect of the Waste Core Strategy please complete a separate form for each.

Paragraph number: _____

Policy number: _____

Other (eg table, figure) Appendix A

Sustainability Appraisal: _____

Habitats Reg. Assessment: _____

3. Do you consider that the Waste Core Strategy is:

a) Legally compliant?

Yes

☒

No

☐

b) Sound?

Yes

☒

No

☐

(also answer Q4)

If you think the identified part of the Waste Core Strategy is not legally compliant and is unsound and therefore want to answer 'No' to both parts of this question, please fill in two separate forms, indicating which representation relates to legal compliance and which relates to soundness.

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Please see separate sheet,

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**Worcestershire County Council Waste Core Strategy
Development Plan Document
Representation 4 of 4 – BNP Paribas Real Estate**

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 is considered that the location is ideal to the 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.

Schofield, Rebecca (PEP, Planning, Policy)

From: B MEDDINGS
Sent: 17 June 2011 17:32
To: WCS (PEP)
Cc: Clerk to the Council Elaine Meredith
Subject: Waste Core Strategy Dev.Plan Document
Attachments: WCC Waste Core Strategy 2011.doc

To: Nicholas Dean
Minerals & Waste Team Leader, WCC

Thank you for your efforts to ensure that our Parish Council was accorded the opportunity to be consulted in order to respond with our representations on the Waste Core Strategy Development Plan Document.

In view of the short notice and in order to meet the necessary deadline, please find our response attached.

Ms Barbara Meddings
Chairman
Hindlip, Martin Hussingtree & Salwarpe Parish Council
17th June 2011

cc: Clerk to the Council, Mrs E.Meredith

WORCESTERSHIRE COUNTY COUNCIL WASTE CORE STRATEGY
DEVELOPMENT PLAN DOCUMENT;
PUBLICATION DOCUMENT CONSULTATION(Regulation 27)

RESPONSE

HINDLIP, MARTIN HUSSINGTREE & SALWARPE PARISH COUNCIL
email: hindlipmartinandsalwarpepc@yahoo.co.uk

Clerk to the Council
Mrs Elaine Meredith
PO Box 823
Worcester
WR1 9BP

17th June 2011

REPRESENTATION:

Areas of Search – Identification of land potentially suitable for waste management.
Specifically Sites 2 and 1 at Shires Business Park, City of Worcester.

.....

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 specific sites 2 and 1 at Shire Business Park; such concerns also applicable to Sites 5 and 4 on the linked Warndon and Berkley Park Business Parks.

Hindlip Parish is within the Green Belt.

- (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.

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.

- 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 highway 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.

B.J.Meddings

Chairman

Hindlip, Martin Hussingtree & Salwarpe Parish Council

- 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 highway network to and from Junction 6 of the M5 Motorway.

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B.J.Meddings

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