

Worcestershire Waste Core Strategy

Representations received to

Consultation on the Addendum to the

Worcestershire Waste Core Strategy

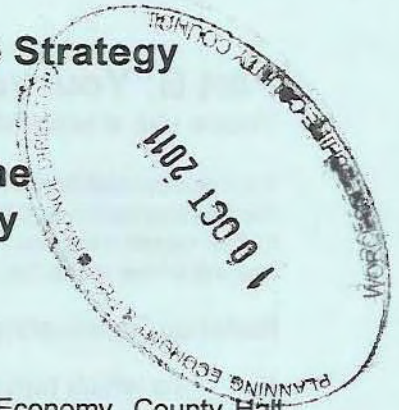
Submission Document

October to November 2011

ADD 1640/1

Worcestershire County Council Waste Core Strategy Development Plan Document:

Consultation on the Addendum to the Worcestershire Waste Core Strategy Submission Document



Response form

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

3rd October 2011 to 5.30pm on Tuesday 15th November 2011

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:

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: Philip Last name: VERNON

Organisation (where relevant): _____

Job title (where relevant): _____

Address: 29 WARELEY PARK
HARILEBURY

Post code: DY11 2X1

Telephone number: _____

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 _____ Representation ____ of ____

2. To which part of the **Worcestershire Waste Core Strategy Addendum** does this representation relate?

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

Addendum reference: _____

Sustainability Appraisal section: _____

Habitats Regulations Assessment Addendum: _____

Evidence base: _____

3. Do you consider that the changes proposed in the **Worcestershire Waste Core Strategy Addendum** will make the Waste Core Strategy:

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 that the changes proposed in the **Worcestershire Waste Core Strategy Addendum** will not make the Waste Core Strategy sound 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 changes proposed in the **Worcestershire Waste Core Strategy Addendum** will not make the Waste Core Strategy legally compliant or sound.

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 note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested change. Further representations will normally only be possible at the request of the Inspector, based on the matters/issues he/she identifies for examination.

6. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Yes ☐

No ☐

7. If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary

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

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

[Redacted Signature]

Date:

5/10/11

Worcestershire County Council Waste Core Strategy Development Plan Document:

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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.

1. Who are you?

Title Mr First name: Neil Last name: Vivash

Organisation (where relevant): Titan Steel Wheels

Job title (where relevant): Chief Production Engineer

Address: Bridge Rd, Cookley
Worcestershire

Post code: DY10 3SD

Telephone number: 01562 850561 x1118

Email address: neilvivash@titansteelwheels.com

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 _____ Representation ____ of ____

2. To which part of the **Worcestershire Waste Core Strategy Addendum** does this representation relate?

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

Addendum reference:

Sustainability Appraisal section:

Habitats Regulations Assessment Addendum:

Evidence base:

3. Do you consider that the changes proposed in the **Worcestershire Waste Core Strategy Addendum** will make the Waste Core Strategy:

a) Legally compliant?

b) Sound?

Yes

Yes

☐☐

No

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 that the changes proposed in the **Worcestershire Waste Core Strategy Addendum** will not make the Waste Core Strategy sound 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 changes proposed in the **Worcestershire Waste Core Strategy Addendum** will not make the Waste Core Strategy legally compliant or sound.

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

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6. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Yes ☐

No ☐

N/A

7. If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary

N/A

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

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

11/10/11

Please note :-

this is a complex area and I am not qualified and have insufficient time to analyse the detail of the 'waste core strategy'

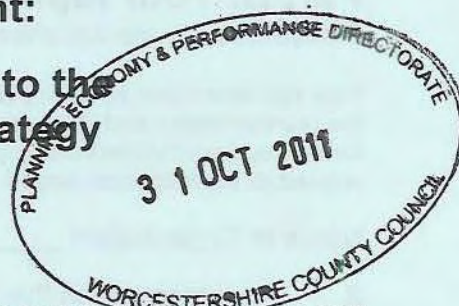
The mailing list for this questionnaire should be targeted and not random.

Neil R. Vrash

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Part A: Your details

For office use only. Ref:

1753 / 3

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: GORDON Last name: KNOWLES

Organisation (where relevant): _____

Job title (where relevant): _____

Address: 62, WARELEY PARK

HARTLEBURY NR, KIDDERMINSTER

Post code: DY11 7XE

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 ____

2. To which part of the **Worcestershire Waste Core Strategy Addendum** does this representation relate?

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

Addendum reference: _____

Sustainability Appraisal section: _____ ☒

Habitats Regulations Assessment Addendum: _____

Evidence base: _____ ☒

3. Do you consider that the changes proposed in the **Worcestershire Waste Core Strategy Addendum** will make the Waste Core Strategy:

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 that the changes proposed in the **Worcestershire Waste Core Strategy Addendum** will not make the Waste Core Strategy sound 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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5. Please give details of why you consider that the changes proposed in the **Worcestershire Waste Core Strategy Addendum** will not make the Waste Core Strategy legally compliant or sound.

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Technological advances within the next decade would make this strategy totally obsolete. The financial investment involved added to the ongoing carbon footprint of transportation

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

of waste to the site makes this proposal absolutely indefensible and unsustainable.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested change. Further representations will normally only be possible at the request of the Inspector, based on the matters/issues he/she identifies for examination.

6. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

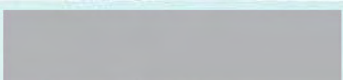
Yes ☐

No ☒

7. If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary

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Signature: 

Date: 28 - 10 - 11

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Part A: Your details

For office use only. Ref:

Add 1679/4

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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.

1. Who are you?

Title MR First name: NICK Last name: ROBERTS

Organisation (where relevant): AXIS – on behalf of MERCIA WASTE MANAGEMENT

Job title (where relevant): _____

Address: AXIS, CAMELLIA HOUSE

76 WATER LANE

Post code: WILMSLOW

Telephone number: SK9 5BB

Email address: nickroberts@axisped.co.uk

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 MERCIA WASTE MANAGEMENT Representation 1 of 1

2. To which part of the **Worcestershire Waste Core Strategy Addendum** does this representation relate?

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

Addendum reference: FIGURE 14

Sustainability Appraisal section:

Habitats Regulations Assessment Addendum:

Evidence base:

3. Do you consider that the changes proposed in the **Worcestershire Waste Core Strategy Addendum** will make the Waste Core Strategy:

- | | | |
|-----------------------|------------------------------|---------------------------------------------------------|
| a) Legally compliant? | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| b) Sound? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> (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 that the changes proposed in the **Worcestershire Waste Core Strategy Addendum** will not make the Waste Core Strategy sound please specify why:

- | | |
|----------------------------------------------|-------------------------------------|
| a) It is not justified | <input type="checkbox"/> |
| b) It is not effective | <input checked="" type="checkbox"/> |
| c) It is not consistent with national policy | <input type="checkbox"/> |

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 changes proposed in the **Worcestershire Waste Core Strategy Addendum** will not make the Waste Core Strategy legally compliant or sound.

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.

AXIS prepared a representation (1679/49) on behalf of Mercia Waste Management as part of the Regulation 27 consultation (March to May 2011). The representation highlighted an inconsistency with regard to the identified area of search which appears to have been carried through to the latest iteration of the Waste Core Strategy. The purpose of this representation is to highlight/reiterate the points made during the last consultation process.

Attachment 4 Figure 19, of the latest Addendum to the Waste Core Strategy Submission Document, references the identified areas of search and lists sites suitable for waste management development. This figure identifies that 'Hartlebury Trading Estate' is located within Level 1 of the Geographical Hierarchy (Kidderminster Zone). Detailed analysis of Figure 14 'Key Diagram: Geographic Hierarchy' (20th September 2011) has concluded that Figure 14 is in error by not encompassing Hartlebury Trading Estate within the Level 1 area. Furthermore, previous

consultation (as part of the response to the Regulation 27 document) with Worcestershire County Council Planners has confirmed that this is an error.

Nevertheless, the Waste Core Strategy continues to be internally inconsistent and (indeed in accordance with the advices received from officers) Figure 14 should be revised in order for the Waste Core Strategy to be effective. This could be achieved by revising the Key Diagram to accurately illustrate geographical landmarks/boundaries (i.e. roads, rivers, railways and railway station symbols) so that they overly Levels 1-5. However, a revision to the Kidderminster Zone to encompass land south of the Hartlebury Station area would ensure that the key diagram is consistent with Attachment 4 Figure 19.

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

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6. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Yes

☐

No


☐

7. If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary

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

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

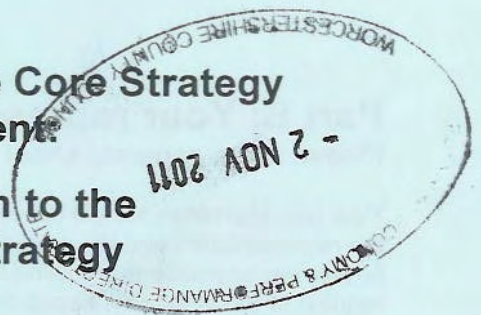


Date:

24/10/11

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Part A: Your details

For office use only. Ref:

607/5

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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.

1. Who are you?

Title MR First name: STEPHEN Last name: SEYMOUR

Organisation (where relevant): LEIGH & BRANSFORD PARISH COUNCIL

Job title (where relevant): VICE CHAIRMAN

Address: ROSE COTTAGE, SUCKLEY ROAD
LEIGH WORCESTER

Post code: WR6 5LE

Telephone number: [REDACTED]

Email address: [REDACTED]

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 LEIGH BRADFORD PC

Representation 1 of 1

2. To which part of the **Worcestershire Waste Core Strategy Addendum** does this representation relate?

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

Addendum reference: 1

Sustainability Appraisal section: Y

Habitats Regulations Assessment Addendum:

Evidence base:

3. Do you consider that the changes proposed in the **Worcestershire Waste Core Strategy Addendum** will make the Waste Core Strategy:

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'.

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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 changes proposed in the **Worcestershire Waste Core Strategy Addendum** will not make the Waste Core Strategy legally compliant or sound.

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

Part 1: About you

The purpose of this form is to collect information about you and your organisation. It is important that you provide accurate and complete information. The information you provide will be used to determine whether you are eligible to participate in the examination and to determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Please provide the following information:

1. Name of your organisation: _____

2. Address of your organisation: _____

3. Contact details of your organisation: _____

4. Name and position of the person responsible for the examination: _____

5. Name and position of the person responsible for the representation: _____

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested change. Further representations will normally only be possible at the request of the Inspector, based on the matters/issues he/she identifies for examination.

6. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Yes ☐

No ☐

7. If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary

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

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature: _____

Date: _____

28/10/11

Our ref:
Your ref:

Nicholas Dean
Minerals and Waste Policy
Planning Environment and Economy
Worcestershire County Council
County Hall
Spetchley Road
Worcester
WR5 2NP

Patricia Dray
Assistant Asset Manager
9th Floor
The Cube
199 Wharfside Street
Birmingham B1 1RN

Direct Line: 0121 678 8330
2 November 2011

Add - 1672/6

Dear Mr Dean

CONSULTATION ON THE ADDENDUM TO THE WORCESTERSHIRE WASTE CORE STRATEGY SUBMISSION DOCUMENT

Thank you for the opportunity to provide comments on the Addendum to the Worcestershire Waste Core Strategy. I understand that my colleague, Neil Hansen, provided comments in relation to the Draft Worcestershire Waste Core Strategy (Regulation 27) in February of this year. These comments did not relate to soundness of the plan, rather they sought to further clarify points.

It was noted that there should be a distinction between the Highways Agency Strategic Road Network compared to that shown in figure of Figure 1 of the Waste Core Strategy. The Highways Agency network within Worcestershire is made up of the M5, A46 and the M50. This could be included in paragraph 2.14.

Additionally, we recommended that reference be made to the requirement for the Highways Authority (ies) to be involved from the outset of the Transport Assessment process when considering proposals for development, where there is likely to be an impact on the safe and efficient functioning of the Transport Networks.

We advised that reference should also be made to the Highways Agency's involvement in agreeing the scope and nature of the Transport Assessment, together with any measures to mitigate the impact of the development, where the proposal might be expected to have an impact on the SRN. The reason for the inclusion of additional text was to ensure that the Highways Agency is able at an early stage in planning application process to meet with a developer to scope such issues as the potential transport impacts of a proposal and discuss the need to prepare a Transport Assessment/Travel Plan to address concerns that we may have.

Unfortunately, the Highways Agency, in addition to Mr Hansen's e-mail to yourselves (referred to above), did not provide a response in relation to the formal consultation, as we were undergoing internal restructuring. However, we would take this opportunity to

Page 1 of 2

provide the following comments in relation to the Addendum Waste Core Strategy. We would recommend in relation to change reference number G10, the new footnote text to paragraph 4.12, should be amended to state that this may include the Highways Agency. Again, we would stress that these comments do not relate to the soundness of the plan.

Yours sincerely



Patricia Dray

NDD West Midlands

Email: patricia.dray@highways.gsi.gov.uk

Respondent reference number and contact details	To which part of the WCS addendum does this representation relate? (Addendum/Sustainability Appraisal/ HRA Addendum/Evidence Base)	Do you consider that the changes proposed will make the WCS...		If you consider that the changes proposed in the WCS addendum will not make the WCS sound please specify why.			Please give details of why you consider that the changes proposed will not make the WCS legally compliant or sound.	Do you consider it necessary to participate at the oral part of the examination
		Legally compliant ?	Sound?	not justified	not effective	not consistent with national policy		
Add-422/7 Mrs Sharron Barfield Brintons Carpets Ltd Environmental Co-ordinator PO Box 16 Exchange Street Kidderminster DY10 2TP sbarfield@brintons.co.uk	Not specified	-	-	-	-	-	I have no comments at this time.	-
Add-740/8 Mr Malcolm Watt Cotswolds Conservation Board Planning Officer Fosseway Norhleach Gloucestershire GL54 3JH 01454 862004 malcolm.watt@cotswoldsaoonb.org.uk	<ul style="list-style-type: none"> Addendum HRA Addendum 	Yes	Yes	-	-	-	No comments made.	-
Add-1081/9 Mr Steven Bloomfield Worcestershire Wildlife Trust Conservation Officer - Planning Lower Smite Farm Hindlip Worcester WR3 8SZ 01905 754 919 stevenb@worcestershirowildlifetrust.org	<ul style="list-style-type: none"> Addendum (Whole document) 	Yes	Yes	-	-	-	No comments made.	No
Add-520/10 Mrs A. Owen Badsey and Aldington Parish Council Clerk to the Parish Council White House, Main Street, Aldington, Near Evesham WR11 7XB badseyipc@yahoo.co.uk	<ul style="list-style-type: none"> Addendum (Whole document) 	-	-	-	-	-	As per previous consultations the Parish Council considers that the Waste Core Strategy documents are too technical for meaningful comment by those without the necessary expertise.	-



MINISTRY OF DEFENCE

Nicholas Dean
Worcestershire County Council
Minerals & Waste
County Hall
Spetchley Road
Worcestershire
WR5 2NP



Defence Infrastructure Organisation

732/11

Christopher Evans
Assistant Safeguarding Officer
Statutory & Offshore
Kingston Road
Sutton Coldfield
B75 7RL

Tel: +44 (0)121 311 2274 Tel (MOD): (9)4421 2274
Fax: +44 (0)121 311 2218
E-mail: DIOOpsNorth-LMS7a1b@mod.uk
www.mod.uk/DIO

3/11/2011

Your Ref – SHLAA001
Our Ref – DIO/SUT/42/36/241

Dear Mr Dean

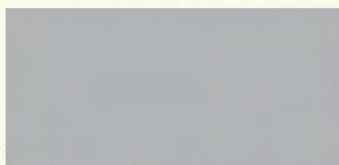
Worcestershire Waste Core Strategy Development Plan Document: Consultation on the Addendum to the Submission Document

Thank you for consulting Defence Infrastructure Organisation (DIO) on the above document which was received by this office on 2nd November 2011.

I can confirm that the MOD has no comments to make on the above document as Worcestershire County falls outside of any MOD safeguarding consultation zones.

I trust this letter is clear, however should you have any queries please do not hesitate to contact me.

Yours Sincerely



Chris Evans
Defence Infrastructure Organisation Safeguarding

Schofield, Rebecca (PEP, Planning, Policy)

From: Claire Streather [clairestreather@coal.gov.uk] on behalf of The Coal Authority-Planning [PlanningConsultation@coal.gov.uk]
Sent: 08 November 2011 14:33
To: WCS (PEP)
Subject: Waste Core Strategy DPD - Consultation on the Addendum

Dear Nicholas Dean

Thank you for consulting The Coal Authority on the above.

Having reviewed your document, I confirm that we have no specific comments to make on this document at this stage.

We look forward to receiving your emerging planning policy related documents; preferably in an electronic format. For your information, we can receive documents via our generic email address planningconsultation@coal.gov.uk, on a CD/DVD, or a simple hyperlink which is emailed to our generic email address and links to the document on your website.

Alternatively, please mark all paper consultation documents and correspondence for the attention of Planning and Local Authority Liaison.

Should you require any assistance please contact a member of Planning and Local Authority Liaison at The Coal Authority on our direct line (01623 637 119).

Regards

Claire Streather

Admin Officer

Planning and Local Authority Liaison

The Coal Authority

✉ 200 Lichfield Lane, Berry Hill, Mansfield, Nottinghamshire NG18 4RG

☎ Planning Enquiries: 01623 637 119

✉ Planning Email: planningconsultation@coal.gov.uk

🖱 Website: www.coal.gov.uk/services/planning

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Worcestershire County Council Waste Core Strategy Development Plan Document:

Consultation on the Addendum to the Worcestershire Waste Core Strategy Submission Document



Response form

1649/13

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

3rd October 2011 to 5.30pm on Tuesday 15th November 2011

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:

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 MRS First name: EVELYN Last name: JONES

Organisation (where relevant): _____

Job title (where relevant): _____

Address: 'GLENELG' OLD WORCESTER RD
WARELEY WORCS.

Post code: DY11 7XS

Telephone number: _____

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 _____ Representation ____ of ____

2. To which part of the **Worcestershire Waste Core Strategy Addendum** does this representation relate?

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

Addendum reference: _____
Sustainability Appraisal section: _____

Habitats Regulations Assessment Addendum: _____
Evidence base: _____

3. Do you consider that the changes proposed in the **Worcestershire Waste Core Strategy Addendum** will make the Waste Core Strategy:

a) Legally compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
b) Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> (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 that the changes proposed in the **Worcestershire Waste Core Strategy Addendum** will not make the Waste Core Strategy sound please specify why:

a) It is not justified	<input type="checkbox"/>
b) It is not effective	<input checked="" type="checkbox"/>
c) It is not consistent with national policy	<input checked="" type="checkbox"/>

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 changes proposed in the **Worcestershire Waste Core Strategy Addendum** will not make the Waste Core Strategy legally compliant or sound.

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.

The local authority have their own agenda which appears to be opposed to government's present strategies. The contractor has its preferred method of incineration. More efforts should be made to recycle - especially business waste and food waste. More efforts should be made

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

to prevent over-packaging. More effort should be made to encourage smaller, more suitable technologies, thus reducing road miles. Herefordshire & Worcestershire would benefit more from flexible technologies being largely rural.

Incineration is obviously not renewable.

If the contractor has only one option - that of incineration how can a Waste Core Strategy hope to be effective?

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested change. Further representations will normally only be possible at the request of the Inspector, based on the matters/issues he/she identifies for examination.

6. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Yes ☐

No ☒

7. If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary

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

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

[Redacted Signature]

Date:

09.11.11

* To rely on one form of technology with a life of 30 years leaves no room for better technologies to emerge or to encourage better recycling.

**Worcestershire County Council Waste Core Strategy
Development Plan Document:
Consultation on the Addendum to the
Worcestershire Waste Core Strategy
Submission Document
Response form**

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

3rd October 2011 to 5.30pm on Tuesday 15th November 2011

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.

For office use only. Ref:

Part A: Your details

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 Miss First name: **Katherine** Last name: **Burnett**

Organisation (where relevant): **British Waterways**

Job title (where relevant): **Area Planner Birmingham City Region**

Address: **Peel Wharf, Lichfield Street, Fazeley, Tamworth, Staffs**

Post code: **B78 3QZ**

Telephone number: **07824 356538**

Email address: **Katherine.burnett@britishwaterways.co.uk**

Part B: Your representation

For office use only. Ref:

Please use a separate sheet for each representation

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 **British Waterways** Representation **1** of **1**

2. To which part of the **Worcestershire Waste Core Strategy Addendum** does this representation relate?

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

Addendum reference: **G3**

Sustainability Appraisal section: _____

Habitats Regulations Assessment Addendum: _____

Evidence base: _____

3. Do you consider that the changes proposed in the **Worcestershire Waste Core Strategy Addendum** will make the Waste Core Strategy:

- 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 that the changes proposed in the **Worcestershire Waste Core Strategy Addendum** will not make the Waste Core Strategy sound 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 changes proposed in the **Worcestershire Waste Core Strategy Addendum** will not make the Waste Core Strategy legally compliant or sound.

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

From: Peter.Davies@severntrent.co.uk
Sent: 14 November 2011 15:18
To: WCS (PEP)
Subject: Re: Worcestershire Waste Core Strategy - Addendum to the Submission Document - Consultation

Marianne,

Thank you for your mail regarding the addendum. On behalf of Severn Trent Water I appreciate the opportunity to comment on the addendum to the Submission Document but I have nothing to add to the previous comments.

Kind regards,

Peter

Peter Davies

Senior Commercial Development Advisor
Severn Trent Water

☎ 07771 938817

✉ peter.davies@severntrent.co.uk

✉ growth.development@severntrent.co.uk

Date: 15 November 2011
Our ref: 34837-Worcestershire Waste Core
Strategy addendum to submission doc
Your ref: SP8010.12



Nicolas Dean
Worcestershire County Council

Consultation Service
Hornbeam House
Electra Way
Crewe Business Park
Crewe
CW1 6GJ
T: 0300 060 3900

By Email

Dear Mr Dean,

**Worcestershire Waste Core Strategy Development Plan Document:
Consultation on the Addendum to the Submission Document
3rd October to 5:30pm 15th November 2011**

Thank you for your consultation on the above, which was received by Natural England on 3 October 2011.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

We have considered the proposal against the full range of Natural England's interests in the natural environment. Based on the information provided with the application, our comments are as follows:

Overview

Overall, Natural England welcomes this addendum to the submission document. For the purposes of our remit we believe the WCS document to be sound and legally compliant. We would however like to offer additional commentary and changes in relation to some of the changes proposed, aimed at improving the effectiveness of the policies, particularly by improving clarity around and therefore compliance with the *Conservation of Species and Habitats Regulations 2010*. These changes reflect the dialogue held between Worcestershire County Council and Natural England on this subject.

Waste Core Strategy

Addendum reference: Change reference number A9

We offer the following changes to the numbering and structure of policy WCS7. Our recommended changes are intended to provide further separation between the requirements for Internationally designated sites and Nationally/Locally designated sites, improving clarity on requirements for developers and therefore improving the effectiveness of the policy.

In order to protect and enhance Internationally, Nationally and Locally designated sites, habitats, species and heritage assets, proposals for waste management facilities will be permitted where:

a. the proposal, including its location, design, operation, landscaping and/or restoration:

- i) will have no adverse effects on the integrity of Internationally designated sites, either alone or in combination with other plans or projects; or is necessary for the management of an Internationally designated site.**
 - ii) Where the proposed development would or may have adverse effects on the integrity of an Internationally designated site, development will only be permitted where there are:**
 - no alternative solutions; and**
 - imperative reasons of overriding public interest.**
- b. the proposal, including its location, design, operation, landscaping and/or restoration:**
- i) will have no unacceptable adverse impacts on national and local environmental assets.**
 - ii) Where the proposed development would have unacceptable adverse impacts on environmental assets, development will only be permitted where it is demonstrated that the benefits of the development at the proposed site clearly outweigh any unacceptable adverse impacts. Proportionate consideration will be given in accordance with their degree of protection.**
- c. the proposal, including its the design, landscaping and/or restoration, enhances environmental assets, their settings and/or linkages between them.**

We are aware of English Heritage's concerns regarding this policy. We offer our general support for changes which would clarify matters regarding the historic environment, heritage assets and their settings, enabling a better fit with PPS5.

The WCS document needs to clarify its terminology in order to distinguish between International nature conservation sites and International heritage sites. It should be made clear that part A of the policy (as per the recommendation above) and all associated parts of the supporting text refers to European nature conservation sites, namely designated or candidate Special Areas of Conservation, Special Protection Areas and Ramsar sites. Due to the particular requirements under the Habitats Regulations and the resultant specific wording of policy WCS7, International heritage assets and their settings would probably need to be dealt with under a separate point, using different terminology. To improve clarity, International nature conservation sites could potentially be referred to as European sites, European nature conservation sites or as designated/candidate SAC/SPA/Ramsar sites, as the council deems appropriate.

Addendum reference: Change reference number A10

In paragraph 5.7 "adverse impact" should be changed to "adverse effect", bringing this into line with the wording used in the *Conservation of Habitats and Species Regulations 2010*.

Paragraph 5.7 provides justification on the approach taken in the Waste Core Strategy, whereby modelling has been undertaken to a certain level of certainty, but further assessments will be required as a part of a planning application. The clarity of this paragraph could be improved, bringing it into closer alignment with the Habitats Regulations.

The protective regime of the Habitats Regulations is intended to operate at differing levels. The higher the level of the plan in the hierarchy the more general and strategic its provisions, therefore the more uncertain its effects. In some circumstances assessment 'down the line' will be more effective in assessing the potential effects of a proposal on a particular site and protecting its integrity. However, three tests should be applied to

determine when this is appropriate. It will be appropriate to consider relying on the HRA of lower tier plans (e.g. planning applications), in order for a LPA to ascertain a higher tier plan would not have an adverse effect on the integrity of a European site, only where:

A] The higher tier plan assessment cannot reasonably assess the effects on a European site in a meaningful way; whereas

B] The Habitats Regulations Assessment of the lower tier plan, which will identify more precisely the nature, scale or location of development, and thus its potential effects, will be able to change the proposal if an adverse effect on site integrity cannot be ruled out, because the lower tier plan is free to change the nature and/or scale and/or location of the proposal in order to avoid adverse effects on the integrity of any European site (e.g. it is not constrained by location specific policies in a higher tier plan); and

C] The Habitats Regulations Assessment of the plan or project at the lower tier is required as a matter of law or Government policy.

With this in mind, we recommend the following changes:

The Waste Core Strategy is a high level plan which is not technology specific and does not make site allocations. The results of the modelling are based on broad assumptions and provide a level of certainty appropriate for this level of plan. The potential effects from individual waste management facilities will vary and must be assessed as part of the planning application. Policy WCS7 sets out safeguards to ensure that this assessment of lower tier plans/projects is undertaken.

The proposed changes would increase clarity for users, improving the effectiveness of the policy, as well as improving compliance with the Habitats Regulations.

In paragraph 5.7d, the bullet point list should also include “in-combination effects”, improving compliance with the Habitats Regulations.

Addendum reference: Change reference number A11

For the sake of accuracy and if possible at this stage, the reference to the Worcestershire Green Infrastructure Study should be changed to Worcestershire Green Infrastructure Framework/Strategy. There is no GI Study; the current GI Framework will in time be replaced by a final GI Strategy.

Addendum reference: Change reference number A12

The original paragraph 5.9 set a clear requirement for landscaping and restoration to contribute towards biodiversity enhancement. This would have contributed towards meeting the requirement in PPS9 for developments to maintain and enhance, restore or add to biodiversity interests (emphasis added). With the proposed changes this requirement has been lost. We suggest that the original paragraph 5.9 and the replacement paragraph should both be included in the document.

The reference to Natural England’s website is welcome and could be made more relevant by providing more specific links, to our Standing Advice on Protected Species:

<http://www.naturalengland.org.uk/ourwork/planningtransportlocalgov/spatialplanning/standingadvice/advice.aspx>

And to our wildlife management and licensing pages:

<http://www.naturalengland.org.uk/ourwork/regulation/wildlife/default.aspx>

Addendum reference: Change reference number A14

For the sake of accuracy and if possible at this stage, the reference to the Worcestershire Green Infrastructure Study should be changed to Worcestershire Green Infrastructure Framework/Strategy. There is no GI Study; the current GI Framework will in time be replaced by a final GI Strategy.

Addendum reference: Change reference number A15

The following changes are recommended in accordance with the commentary provided in relation to change reference number A10.

The Habitats Regulations Assessment's Figure 2.5 shows the extent of the areas in which it could not be concluded that there will be no likely significant effects from the development of waste management facilities. However, the significance of any such effects will depend upon the precise nature, scale or location of the development and must therefore be determined by a site specific assessment in line with Policy WCS 7.

Worcestershire County Council HRA Addendum (ERM, September 2011)

Natural England welcomes the additional work undertaken to address the implementation uncertainties previously identified. We are confident that the HRA Addendum report has had an appropriate level of influence on the Waste Core Strategy and has led to sound and legally compliant policies. We conclude that the document appears compliant with the Habitats Regulations.

Please note that at this stage we have not checked the critical loads/levels used. We note that the loads/levels have been taken from the APIS website and trust that accuracy checks have been undertaken at earlier stages in the WCS production. Please do not hesitate to contact me if you would like NE to undertake any specific checks.

For technical aspects relating to the emissions modelling used, the Council should contact the Environment Agency.

Sustainability Appraisal of the Worcestershire Waste Core Strategy Submission Document Addendum (ERM, September 2011)

We welcome the addendum SA document and are pleased to note that the additional work undertaken has addressed some of the recommendations made in the previous SA.

However, we note the remaining mitigation recommendations made by the SA, particularly recommendation 3:

“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”.

The council should satisfy itself that the policies set out in the WCS will address this recommendation.

For any correspondence or queries relating to this consultation only, please contact Hayley Pankhurst using the details given below. For all other correspondence, please contact the address above.

Yours sincerely,



Hayley Pankhurst

Lead Advisor

Land Use Operations Team

Tel: 0300 060 1594

Email: hayley.pankhurst@naturalengland.org.uk

Address: Block B, Government Buildings, Whittington Road, Worcester, WR5 2LQ

From: Alison Palmer [REDACTED]
Sent: 15 November 2011 16:33
To: WCS (PEP)
Subject: Waste core strategy addendum

FAO: Nicholas Dean

Dear Mr Dean,

I have tried to complete the response form for the above addendum but unfortunately the council website is saying that it closed at 5.30pm on the 15th November - however as you can see from the time of this mail it is not yet 5.30pm. I have telephoned the office and they suggest I send you an e-mail detailing our response.

I will follow the flow of the response form for ease:

Part A
Alison Palmer, Councillor on Bredon Parish Council.
Orchard House, Main Road, Bredon, Worcestershire GL20 7LX
01684 772913

Part B
Our representation relates predominantly to the addendum reference. We consider that the changes proposed will add to the strength of the document and make it sound and legally compliant.

We do not seek any further changes.

Part C
I represent Bredon Parish Council

If you require any further documentation from myself please do not hesitate to contact me.

Thank you
Alison Palmer

Schofield, Rebecca (PEP, Planning, Policy)

716 / 18


From: SMITH, Amanda [Amanda.Smith@english-heritage.org.uk]
Sent: 15 November 2011 17:27
To: WCS (PEP)
Subject: Waste Core strategy Addendum Representations
Attachments: Addendum to Waste DPD Nov 2011 Representations.doc

Dear Mr Dean

Please find attached our representations on the above document.

Yours sincerely

Amanda Smith
Planner (West Midlands)
English Heritage
The Axis, 10 Holliday Street, Birmingham, B1 1TG
Tel: 0121 6256851 mobile: 07771937379
Amanda.Smith@english-heritage.org.uk

 Please do not print this e-mail unless you really need to

This e-mail (and any attachments) is confidential and may contain personal views which are not the views of English Heritage unless specifically stated. If you have received it in error, please delete it from your system and notify the sender immediately. Do not use, copy or disclose the information in any way nor act in reliance on it. Any information sent to English Heritage may become publicly available.

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ENGLISH HERITAGE

WEST MIDLANDS REGION

Mr N Dean
Minerals and Waste Policy
Planning, Environment and Economy
County Hall
Spetchley Road
Worcester
WR5 2NP

Our ref: HD/P LDF
Your ref:

Telephone 0121 625 6851
Fax 0121 625 6820

15 November 2011

Dear Mr Dean

re: **ADDENDUM TO THE WORCESTERSHIRE WASTE CORE STRATEGY
SUBMISSION DOCUMENT**

Thank you for your email of 3 October and the consultation on the proposed Addendum to the Waste Core Strategy.

A

General Comments

English Heritage has submitted responses to each consultation stage in the preparation of the Waste Core Strategy. We welcome the Council's positive approach to addressing our representations, this including an agreed series of amendments to the Publication Document published earlier in the year.

We understand that a further Habitats Regulations Assessment (HRA) has since been carried out and this has necessitated a series of changes to the Waste Core Strategy. We acknowledge the requirement to undertake and meet the requirements of the HRA. However, in the case of a number of the proposed amendments we have concerns that the changes have not fully taken into account potential implications for the conservation of the historic environment and heritage assets in accordance with PPS5 *Planning for the Historic Environment*. This is particularly in the case of Policy WCS7 Environmental Assets and to which our representations primarily relate.

We would be happy to work with the County Council and with Natural England in arriving at a mutually agreed approach to the structure and content of the policy and reasoned justification to ensure a robust policy framework for the conservation and, where appropriate, enhancement of the natural and historic environment.

8TH FLOOR, THE AXIS, 10 HOLLIDAY STREET, BIRMINGHAM B1 1TG

Telephone 0121 625 6820 Facsimile 0121 625 6821

www.english-heritage.org.uk

Please note that English Heritage operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available



Detailed Representations

B

Addendum Change Reference Number: A9 – Policy WCS7 Environmental Assets

English Heritage is concerned that as proposed the substantive set of changes, whilst aligning with the particular requirements of the Habitats Regulations Assessment (HRA), could be potentially confusing with respect to other environmental assets and in particular the historic environment and heritage assets. The policy has a wide remit in addressing all environmental assets as outlined in the supporting Table 7. However, the amendments as proposed have resulted in the deletion of the specific policy reference to heritage assets and their setting, and more generally the terminology adopted does not fully accord with PPS5. This concern is further exacerbated by the proposed expansion of and changes to the reasoned justification (Change References: A10, A11, A12, A13, A14). Hence, in the context of PPS5 and consistency with national policy we consider that the proposed changes serve to weaken the soundness of the policy with respect to the conservation of the historic environment.

Working within the overall structure of the Policy, we consider that following changes are required to address our concerns:

- Clarification of the policy working to ensure that it provides an appropriate and robust policy framework for all environmental assets - including heritage assets of international, national and local significance and their setting.
- The balancing and restructuring of the policy and reasoned justification to address the provisions of PPS5 with regard to the historic environment and heritage assets. In particular there is the need to ensure an appropriate understanding of the significance of heritage assets (designated and non designated) and their setting and the potential impact of development on this significance utilising relevant local evidence bases.
- A positive approach to the enhancement of heritage assets and their setting.
- The expansion of the supporting text especially at paragraph 5.11 dealing with the historic environment and heritage assets.

As indicated above we would be happy to work with the County Council and with Natural England in arriving at a mutually agreed approach to the structure and content of the policy and reasoned justification.

Yours sincerely

Amanda Smith
Planner
E-mail: amanda.smith@english-heritage.org.uk



8TH FLOOR, THE AXIS, 10 HOLLIDAY STREET, BIRMINGHAM B1 1TG

Telephone 0121 625 6820 Facsimile 0121 625 6821

www.english-heritage.org.uk

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Correspondence or information which you send us may therefore become publicly available

1733/19
~~1034~~

Schofield, Rebecca (PEP, Planning, Policy)

From: Cording, Carl [carl.cording@environment-agency.gov.uk]
Sent: 15 November 2011 17:02
To: WCS (PEP)
Cc: Clare, Ruth
Subject: consultation response to WCS
Attachments: EA response to WCS submission Addendum 15.11.11.rtf

To whom it may concern,

Please find attached our comments re the above.

Kind regards,

Carl Cording
(Senior Planning Officer)

Environment Agency
Riversmeet House
Tewkesbury GL20 8JG
Tel: 01684 864382
Fax: 01684 293 599

 On average each of our staff produces 53kg of waste per year at work. We are working towards reducing this by 20% by 2015. Please play your part.

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Mr Nicholas Dean
Worcestershire County Council
Planning Policy
County Hall
Spetchley Road
Worcester
Worcestershire
WR5 2NP

Our ref: SV/2010/103980/CS-
05/SB1-L01

Date: 15 November 2011

Dear Mr Dean

Worcestershire Waste Core Strategy Development Plan Document: Consultation on the Addendum to the Submission Document.

Thank you for consulting us with regards the above. Your letter was received in these offices on 03 October 2011.

- We have reviewed the addendum to the Submission Document (dated October 2011) and welcome the changes: F1 and F2. We have also reviewed the Worcestershire County Council Habitat Regulation Assessment Addendum Final Report undertaken by ERM (dated September 2011) and note the findings made.

We have no further comments to make with regards the 'soundness' of this document and refer you to our letter dated 03 May 2011.

- I trust that the above is clear and of use but should you wish to discuss anything in further detail please do get in touch.

Yours sincerely

Mr Carl Cording
Senior Planning Officer

Direct dial 01684 864382
Direct fax 01684 293599
Direct e-mail carl.cording@environment-agency.gov.uk

1660/20

**Worcestershire County Council Waste Core Strategy
Development Plan Document:**

**Consultation on the Addendum to the
Worcestershire Waste Core Strategy
Submission Document**



Response form

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

3rd October 2011 to 5.30pm on Tuesday 15th November 2011

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:

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 Dr. First name: John Last name: Termin

Organisation (where relevant): _____

Job title (where relevant): _____

Address: Buckingham Lodge, Far Forest

Post code: DY14 9DR

Telephone number: _____

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 _____ Representation ____ of ____

2. To which part of the **Worcestershire Waste Core Strategy Addendum** does this representation relate?

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

Addendum reference: _____ ☒

Sustainability Appraisal section: _____

Habitats Regulations Assessment Addendum: _____

Evidence base: _____

3. Do you consider that the changes proposed in the **Worcestershire Waste Core Strategy Addendum** will make the Waste Core Strategy:

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 that the changes proposed in the **Worcestershire Waste Core Strategy Addendum** will not make the Waste Core Strategy sound 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 changes proposed in the **Worcestershire Waste Core Strategy Addendum** will not make the Waste Core Strategy legally compliant or sound.

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

Part C: About You

The section is for monitoring purposes only. It will be reviewed from the representation form and analysis separately from the response form. You will not be invited back into the room to answer questions and the section will not be included in the report.

To enable us to monitor how successful the Council's Statement of Community Involvement (SCI) has been in fostering community engagement please answer the following questions. This information will only be used for the purpose of evaluation and research, in order to improve our services.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested change. Further representations will normally only be possible at the request of the Inspector, based on the matters/issues he/she identifies for examination.

6. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?
- Yes ☐ No ☐

7. If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary

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

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature: 	Date: 7. 11. 2011
------------------------------------------------------------------------------------------------	-------------------

601/21

Worcestershire County Council Waste Core Strategy Development Plan Document:

Consultation on the Addendum to the Worcestershire Waste Core Strategy Submission Document

Response form

Please return to: Minerals and Waste Policy, Planning Environment and Economy, County Hall,
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3rd October 2011 to 5.30pm on Tuesday 15th November 2011

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Part A: Your details

For office use only. Ref:

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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.

1. Who are you?

Title Mrs First name: SIMON Last name: BAXTER

Organisation (where relevant): KEMPSEY PARISH COUNCIL

Job title (where relevant): CLERK TO THE COUNCIL

Address: PARISH OFFICE, COMMUNITY CENTRE,
MAIN ROAD, KEMPSEY, WORCESTER

Post code: WR5 3LQ

Telephone number: [REDACTED]

Email address: Kempseyparishcouncil@btinternet.com

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 KEMPSEY PARISH COUNCIL Representation 1 of 1

2. To which part of the **Worcestershire Waste Core Strategy Addendum** does this representation relate?

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

Addendum reference: ✓
Sustainability Appraisal section:

Habitats Regulations Assessment Addendum:
Evidence base:

3. Do you consider that the changes proposed in the **Worcestershire Waste Core Strategy Addendum** will make the Waste Core Strategy:

a) Legally compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
b) Sound?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> (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 that the changes proposed in the **Worcestershire Waste Core Strategy Addendum** will not make the Waste Core Strategy sound please specify why:

a) It is not justified	<input type="checkbox"/>
b) It is not effective	<input type="checkbox"/>
c) It is not consistent with national policy	<input type="checkbox"/>

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 changes proposed in the **Worcestershire Waste Core Strategy Addendum** will not make the Waste Core Strategy legally compliant or sound.

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

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested change. Further representations will normally only be possible at the request of the Inspector, based on the matters/issues he/she identifies for examination.

6. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Yes ☐

No ☒

7. If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary

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

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

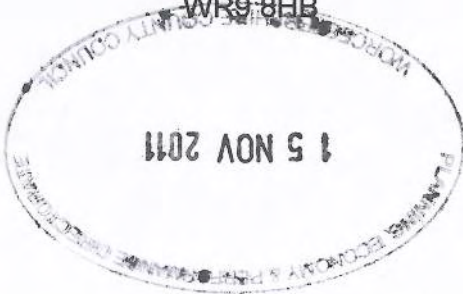
Signature:

Date:

11/11/11

re. Wo. WASTE Core Strategy Cnslttn 1771/23

E Duke
16 The Holloway
Droitwich
WR9 8HB



Following your recommendation (h) that groups should not send in multiple replies iterating each other, I defer to fellow FoE PHIL OLIVER Wyre Forest who is replying.
I agree with what he says.