

**SC1-1779a**

**From:** Chris Mair [REDACTED]  
**Sent:** 17 April 2012 17:00  
**To:** WCS (PEP)  
**Subject:** Waste Strategy - Upton-upon-Severn

I have searched and failed to find a relevant reference on the WCC website in and around the consultation for the Waste Core Strategy to any proposals for upgrading the facility at Upton, currently open and staffed Wednesday, Saturday, Sunday.

There was a previous proposal to relocate the facility, in part to improve the parking that is adjacent and with some level of safety in mind with those using the waste facility and others using the car park.

Of perhaps prime importance is the unsafe and at times seriously dangerous design of the facility. To ask that elderly/infirm people climb metal stairs to throw waste into a container is no longer acceptable. The metal steps are uneven, smoothed, slippery when wet/frosted. That staff are not authorised to assist, other than direct and manage the site and containers coming and going while the facility is open - another danger - is unhelpful and creates a poor impression of staff who are merely following rules.

I would be grateful if you would accept my comments, which are shared by my wife, as part of the consultation process. I would also ask if you can direct me to any relevant section of the Core Strategy that specifically deals with the Upton facility and the options/plans you are seeking to put in place. It has to be painfully apparent to you that the Upton facility is a serious accident waiting to happen.

With regards

Chris Mair  
[REDACTED]

**SC1-1779b**

**From:** Chris Mair [REDACTED]  
**Sent:** 19 April 2012 12:39  
**To:** WCS (PEP)  
**Cc:** Woodward, Richard (ES)  
**Subject:** RE: Waste Strategy - Upton-upon-Severn

Hi Rebecca, perhaps I am being naive, but surely a waste core or core waste strategy has to look at the complete picture. Facilities such as Upton, Pershore etc feed into the bigger waste management picture. In a sense your words corroborate this: 'whether proposals for waste management facilities will be given planning permission'. For the public the reclamation/recycle facilities are the only time they get to see and experience by use a link to waste and recycling.

I feel to leave them out of the developing Strategy will create a document that only talks the talk and little else.

regards  
Chris

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Subject: RE: Waste Strategy - Upton-upon-Severn  
Date: Thu, 19 Apr 2012 10:12:42 +0100  
From: wcs@worcestershire.gov.uk  
To: [REDACTED]  
CC: RWoodward@worcestershire.gov.uk

Dear Mr Mair,

Thank you for taking the time to comment on the Waste Core Strategy.

The Waste Core Strategy is a document which sets out the planning policies that the Council will use to decide whether proposals for waste management facilities will be given planning permission. Because it is a planning document it does not make detailed reference to existing waste facilities or the operation of these sites.

However I have copied this email to Richard Woodward who is the Waste Services Manager so that he is aware of your concerns about the facility at Upton and can pass them on to the appropriate people.

A formal acknowledgement of your comments will follow. We will report them to the Inspector as part of the Waste Core Strategy examination process. If you have any further questions please contact me again by email or call me on 01905 766733  
begin\_of\_the\_skype\_highlighting 01905 766733 end\_of\_the\_skype\_highlighting

Kind regard

Rebecca Schofield

**From:** Chris Mair [REDACTED]  
**Sent:** 17 April 2012 17:00  
**To:** WCS (PEP)  
**Subject:** Waste Strategy - Upton-upon-Severn

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There was a previous proposal to relocate the facility, in part to improve the parking that is adjacent and with some level of safety in mind with those using the waste facility and others using the car park.

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With regards

Chris Mair



**SC2-1688**

**From:** Williams, Dawn [mailto:Dawn.Williams@severntrent.co.uk]

**Sent:** 17 April 2012 11:28

**To:** WCS (PEP)

**Cc:** Davies, Peter

**Subject:** RE: Worcestershire Waste Core Strategy - Consultation on Proposed Changes

Thank you for informing me about the proposed changes in the above document, however at this present time Severn Trent Water has no further comments to make.

Regards

*Dawn*

**Dawn Williams**

**Water Strategy**

**07554114125**

**[dawn.williams@severntrent.co.uk](mailto:dawn.williams@severntrent.co.uk)**



**SC3-682a**

**From:** Louise Jones [mailto:[louise.jones@redditchbc.gov.uk](mailto:louise.jones@redditchbc.gov.uk)]  
**Sent:** 19 April 2012 10:38  
**To:** WCS (PEP)  
**Cc:** Emma Baker  
**Subject:** FW: Worcestershire Waste Core Strategy - Consultation on Proposed Changes

Sir

Thank you for consulting Redditch Borough Council on the above document, I can confirm we have no comments to make on these changes.

Kind regards

**Louise Jones** BSc (Hons) MA MRTPI

Planning Officer, Planning & Regeneration, Regulatory and Housing Services  
Directorate

**Redditch Borough Council**, Town Hall, Walter Stranz Square, Redditch,  
Worcestershire B98 8AH  
Tel: (01527) 64252 ext: 3221  
Email: [louise.jones@redditchbc.gov.uk](mailto:louise.jones@redditchbc.gov.uk) website:  
[www.redditchbc.gov.uk/corestrategy](http://www.redditchbc.gov.uk/corestrategy)

Redditch's vision is an enterprising community which is safe, clean and green.

Please don't print this email unless you really need to.

**SC3-682b**

**From:** Louise Jones [mailto:[louise.jones@redditchbc.gov.uk](mailto:louise.jones@redditchbc.gov.uk)]  
**Sent:** 09 May 2012 13:19  
**To:** WCS (PEP)  
**Cc:** Emma Baker  
**Subject:** Waste Core Strategy Update - Consultation on an Additional Policy

Dear Sir/ Madam

Thank you for providing Redditch Borough Council with the opportunity to comment on the additional policy "*Policy WCS Additional: Presumption in favour of sustainable development*", I can confirm we have no comment to make on this new policy.

Kind regards

**Louise Jones** BSc (Hons) MA MRTPI

Planning Officer, Planning & Regeneration, Regulatory and Housing Services  
Directorate

**Redditch Borough Council**, Town Hall, Walter Stranz Square, Redditch,  
Worcestershire B98 8AH  
Tel: (01527) 64252 ext: 3221  
Email: [louise.jones@redditchbc.gov.uk](mailto:louise.jones@redditchbc.gov.uk) website:  
[www.redditchbc.gov.uk/corestrategy](http://www.redditchbc.gov.uk/corestrategy)

Redditch's vision is an enterprising community which is safe, clean and green.

Please don't print this email unless you really need to.

**From:** Malcolm Victory [REDACTED]  
**Sent:** 04 May 2012 10:50  
**To:** WCS (PEP)  
**Subject:** WCS Consultation

Dear Nick Dean,

Thank you for your communications. I have perused the 166 page document and find it somewhat divergent from the reality of the situation on the ground in 2012. As an example of what I mean, I highlight the following sections:

2.40a Figure 7 and Table 2 show that there is a capacity gap for re-use and recycling facilities and for 'other recovery' facilities but not for sorting and transfer facilities or for landfill or disposal facilities. The existing void space at landfill sites in the county is sufficient to manage the amounts and types of waste expected to need to be landfilled or disposed of over the life of the Waste Core Strategy.

It is widely known that the primary waste facility at Pershore does not have capacity to last until then.

The Worcestershire Sustainable Community Strategy Partnership towards excellence 2008-2013 and Borough, City and District Sustainable Community Strategies identify three cross cutting themes: climate change, community engagement and community cohesion. These are reflected in the Vision and Objectives of the Waste Core Strategy. There has been a shift of focus in Worcestershire Partnership's emerging "A Single Sustainable Community Strategy for Worcestershire" which combines all of the districts' and county sustainable community strategies into one single strategy for Worcestershire. This now prioritises a skilled and prosperous economy, an environment that is cherished and resilient and improved health and well being. The Vision and Objectives of the Waste Core Strategy also contribute towards these aims.

This is simple wish - fulfilment in an under-funded County whose infrastructure is eroding and social problems are increasing, and with an ageing population demographically. I personally detest such bureaucratic doublespeak.

2.54a. By 2027, through timely provision over the Plan period, Worcestershire will have achieved equivalent self-sufficiency in waste management capacity

What specific measures will guarantee this? I did not discover any in the document, nor am I aware of any successful initiatives for increasing or improving the waste capacity of the County. If incineration was conceived as a means of generating energy rather than consuming it, then this could be a real step towards "Sustainable Development"

Best regards,

*Malcolm*

Councillor Malcolm Victory



Malvern Wells  
Worcestershire



cc. Malvern Wells Parish Clerk



For the Attention of Nicholas Dean  
Worcestershire County Council

04 May 2012

[Sent via email: [wcs@worcestershireshire.gov.uk](mailto:wcs@worcestershireshire.gov.uk)]

Dear Mr Dean

**Worcestershire Waste Core Strategy – Proposed Changes Following the Examination**

Thank you for consulting The Coal Authority on the above.

Having reviewed your document, I confirm that The Coal Authority has no specific comments to make at this stage.

We look forward to continuing to receive 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](mailto: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.

I trust this is helpful. However, please do not hesitate to contact me if you require any additional information or would like to discuss this matter further.

Yours sincerely

*D Berry*

**David Berry** *B.Sc.(Hons), MA, MRTPI*  
**Planning Liaison Manager**



**SC6-1280**

**From:** Katherine Burnett [mailto:Katherine.Burnett@britishwaterways.co.uk]

**Sent:** 16 May 2012 12:13

**To:** WCS (PEP)

**Subject:** Worcestershire Waste Core Strategy - Consultation on Proposed Changes following Examination

Dear Nicholas Dean

**Re: Worcestershire Waste Core Strategy - Consultation on Proposed Changes following Examination**

In regard to the above consultation BW have reviewed the proposed changes and have no further comments to make.

Please can you confirm receipt of my email

Yours sincerely

Katherine Burnett BSc (Hons) AMRTPI  
Area Planner Birmingham City Region  
Strategic Planning Team Midlands

**ABC** | Peels Wharf | Lichfield Street | Fazeley | Tamworth | Staffordshire | B78 3QZ | Tel: 01827 252067 | Mob: 07824 356538 | Fax: 01827 288052 | Email: [katherine.burnett@britishwaterways.co.uk](mailto:katherine.burnett@britishwaterways.co.uk)

**SC7-1718**

**From:** David Butcher [mailto:david@ggassociates.co.uk]  
**Sent:** 17 May 2012 10:58  
**To:** WCS (PEP)  
**Subject:** Worcestershire Waste Core Strategy DPD - Proposed Changes

Dear Sir/Madam

Please find attached a representation in response to the Proposed Changes consultation supporting the inclusion of the presumption in favour of sustainable development.

Yours Sincerely

David Butcher  
(Associate)

**Gregory Gray Associates**

Victoria House  
18-22 Albert Street  
Fleet  
Hampshire  
GU51 3RJ

Tel: 01252 624004  
Fax: 01252 626431  
E-mail: [david@ggassociates.co.uk](mailto:david@ggassociates.co.uk)  
Web: [www.ggassociates.co.uk](http://www.ggassociates.co.uk)

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**WORCESTERSHIRE COUNTY COUNCIL WASTE CORE STRATEGY  
DEVELOPMENT PLAN DOCUMENT:  
PUBLICATION DOCUMENT CONSULTATION (REGULATION 27)  
PROPOSED CHANGES RESPONSE FORM**

**PART A: YOUR DETAILS**

Organisation: Sudeley Development Ltd & Norton Parkway Developments Ltd C/o Gregory Gray Associates Ltd

Address: Victoria House,  
18-22 Albert Street,  
Fleet,  
Hampshire,  
GU51 3RJ

Tel: 01252 624004

Email: [info@ggassociates.co.uk](mailto:info@ggassociates.co.uk)

## **PART B: YOUR REPRESENTATION**

Organisation: Sudeley Development Ltd & Norton Parkway Developments Ltd C/o Gregory Gray Associates Ltd

Representation: 1 of 1

- 1. Proposed Change Reference: 161 Presumption in Favour of Sustainable Development**
2. We consider the Waste Core Strategy is legally compliant and sound and support the inclusion of the National Planning Policy Framework (NPPF) presumption in favour of sustainable development as clear policy guidance in the Waste Strategy.
3. The Core Strategy preliminary assessment of sites is supported in relation to site 'Area 7 Industrial Park, Norton'. The assessment of this site determined that a waste facility would fit within the context of the site. Some of the units are already being used for waste management. The infrastructure was considered in good condition with all roads suitable for HGVs and good access links to the M5.
4. We wish to re-confirm that this site is suitable, available and deliverable in a short time scale and recommend its continued inclusion within the Development Plan Document. The presumption set out within the NPPF would support development of the site.

**SC8-617**

# Malvern Town Council

28-30 Belle Vue Terrace  
Malvern  
Worcestershire  
WR14 4PZ

Richard Chapman  
Town Clerk

Telephone: 01684 566667  
Fax: 01684 572572

[townclerk@malvern-tc.org.uk](mailto:townclerk@malvern-tc.org.uk)  
[www.malverntowncouncil.org.uk](http://www.malverntowncouncil.org.uk)



16 May 2012

Our Ref: MTC12/13(Letters)RC007/WCC Waste Core Strategy Consultation  
Your Ref: SP8010.12

Mr N Dean  
Minerals and Waste Team Leader  
Worcestershire County Council  
County Hall  
Worcester  
WR5 2NP

Dear Mr Dean

## **WCC Waste Core Strategy Development Plan - Consultation**

Thank you for your letter of 29 March 2012.

I have invited comments on the proposed changes to the above Strategy but none have been received.

Yours sincerely

Richard Chapman  
Town Clerk



**SC9-740**

17<sup>th</sup> May 2012

Mr Nicholas Dean  
Minerals and Waste Team Leader  
Worcestershire County Council  
Spetchley Road  
Worcester  
WR5 2NP



Your Ref: SP8010.12

Dear Mr Dean

**WASTE CORE STRATEGY FOR WORCESTERSHIRE  
PROPOSED CHANGES TO THE WASTE CORE STRATEGY DPD**

Thank you for your letters dated 29<sup>th</sup> March and 20<sup>th</sup> April 2012 regarding the above.

The Cotswolds Conservation Board **Supports** Main Change PC.60 to **Policy WCS 10: Local Characteristics**.

The Board has the following comments on proposed policy **WCS ADDITIONAL: Presumption in favour of sustainable development.**

1. The Board considers that paragraph (a) does not properly reflect the guidance set out in the NPPF, in particular the reference under "Achieving sustainable development" to the definition of sustainable development in Resolution 24/187 of the United Nations General Assembly.

The definition is meeting the **needs** of the present without compromising the ability of future generations to meet their own **needs**. (**My emphasis**).

**The Board therefore suggests the following amendment to paragraph (a) of policy WCS ADDITIONAL:**

a) When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that ~~improves-meets~~ the economic, social and environmental ~~conditions-~~ **needs** in of the county.

Conserving, enhancing, understanding and enjoying the Cotswolds Area of Outstanding Natural Beauty

Cotswolds Conservation Board Fosse Way Northleach Gloucestershire GL54 3JH

Tel: 01451 862000 Fax: 01451 862001 Email: [info@cotswoldsaonb.org.uk](mailto:info@cotswoldsaonb.org.uk) Website: [www.cotswoldsaonb.org.uk](http://www.cotswoldsaonb.org.uk)



2. It is suggested that a footnote similar to footnote 9 of the NPPF is added to with respect to the final sentence of the proposed policy:


Footnote 9 of the NPPF is:

"9 For example, those policies relating to sites protected under the Birds and Habitats Directives (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion."

A footnote with relevance to Worcestershire circumstances and constraints would be helpful to indicate what restrictions may be relevant.

I do hope these comments are helpful.

Yours sincerely



Martin Veal  
Chairman, Living and Working Sub Committee  
Cotswolds Conservation Board  
01451 862004

**SC10-1733**

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

**Our ref:** SV/2010/103980/CS-  
06/EW1-L01  
**Your ref:** Proposed Changes to the  
Waste Core Strategy DPD following the  
Examination  
**Date:** 21 May 2012

Dear Mr Dean

**Worcestershire Waste Core Strategy Development Plan Document (DPD)-  
Proposed Changes to the Waste Core Strategy DPD following the Examination**

Thank you for consulting us with regards the above. Your letter was received in these offices on 25 April 2012.

We have reviewed the proposed changes and welcome the alterations made. We particularly welcome change references: PC130 and PC134 and have no objection to *Policy WCS Additional: Presumption in favour of sustainable development*.

We have no additional comments to make with regards the 'soundness' of this document and refer you to our earlier consultation responses.

I trust that the above is clear and of use but should you wish to discuss anything in further detail please do not hesitate to 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](mailto:carl.cording@environment-agency.gov.uk)

Nicholas Dean  
Minerals and Waste Team Leader  
Planning, Economy and Performance  
County Hall  
Spetchley Road  
Worcester  
WR5 2NP

Development Section  
Minerals & Waste Planning  
5th Floor Block 2  
Endeavour House  
8 Russell Road  
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Enquiries to: Irina Davis  
Tel: 01473 264208  
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Web: <http://www.suffolk.gov.uk>

Your Ref: SP8010.12

Date: 21 May 2012

**Worcestershire Waste Core Strategy Development Plan Document: Proposed  
Changes to the Waste Core Strategy DPD following the Examination**

Dear Mr Dean

Thank you for your letter at 20 April 2012 regarding the Waste Core Strategy Development Plan document. After careful review of your document we would like to make the following comments relating mainly to the Review of Sustainability of the Proposed Changes to the Worcestershire Waste Core Strategy:

1. In relation to Annex A, 'Appraisal of Key Amended Policies', it would be beneficial to show SA results in the Tables A.1-A.2 for all WCS Policies mentioned in the Review of Sustainability of the Proposed Changes to the Worcestershire Waste Core Strategy Report. For example, policy WCS 7, which was subject to Main Change, does not have its SA appraisal in the table. Showing the SA results for all policies mentioned in the document, would have added more clarity and useful information to justify the results of the appraisal. In our view it would help to demonstrate the fuller picture of the SA results of the changes.

2. In terms of the soundness of the document, we are of the view that the Waste Core Strategy incorporating the proposed Main and Additional modifications is sound and legally compliant.

Yours sincerely

Irina Davis  
Strategic Environmental Assessment Officer



**SC12-1762**

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

Stephen Williams  
Asset Manager  
Floor 9  
The Cube  
199 Wharfside Street  
Birmingham B1 1RN

Direct Line: 0121 678 8732  
21 May 2012

Dear Mr Dean

**WORCESTERSHIRE WASTE CORE STRATEGY DEVELOPMENT PLAN  
DOCUMENT CONSULTATION.  
PROPOSED CHANGES TO THE WASTE CORE STRATEGY DPD FOLLOWING THE  
EXAMINATION.**

Thank you for your recent consultation in relation to the Worcestershire Waste Core Strategy Development Plan, which we received on the 12 April 2012.

The Highways Agency (HA) understands that the Worcestershire Waste Core Strategy Development Plan Document ('the WCS') was submitted to the Secretary of State on 28th November 2011. Hearing sessions were held from 13th to 16th March 2012 to discuss the principal matters identified by the Inspector. In response to the Inspector's questions and the debate in the sessions, the Council is now proposing a number of 'main' and 'additional' changes to the Waste Core Strategy.

In support of these changes, the Council has prepared assessments to consider the potential impacts of their update and the Inspector will consider these, in determining the soundness and legal compliance of the document before issuing his final recommendations.

Overview of Previous Representations

In February 2011, the Highways Agency provided a response to the 'Emerging Preferred Options' document, noting the requirement of the HA to protect the SRN, including the M5, junctions 4 to 8, the M42 junctions 1 to 3a, the M50 junction 1 and its interchange with the M5 at M5 junction 8, and the A46 near and around Evesham. The response highlighted broad support for the DPD but emphasised that, when specific sites were being considered at subsequent stages, an appropriate assessment of traffic impacts on the SRN should be incorporated.

A subsequent meeting (and email exchange) between Worcestershire County Council (WCC) and the HA, clarified that the DPD provided a broad strategy which did not extend to consideration of specific sites or locations, on which a more detailed transport assessment could be made. Nonetheless the HA expressed the view that amendments should be made to Policy WCS3 to ensure full consideration of traffic impacts at application stage, including pre-application scoping and consultation with the HA.

A 'Publication Version', and subsequent 'Addendum' was published in April/June 2011. The HA did not respond to this until November 2011, by which point the Council was at the stage of submitting the document to the Secretary of State. The HA's response noted that we considered the document to be sound, the changes in paragraph 4.2 (dealing with the assessment of traffic assessments) were appropriate, but a more explicit reference to the HA as a consultee would be desirable.

#### Current and Proposed Changes

The Highways Agency understands that the proposed changes are of two types:

- 'Main' changes which must be subject to consultation and which must be considered and endorsed by the Inspector in order make the DPD sound.
- 'Additional' changes which do not materially affect the policies and do not need to be endorsed by the Inspector (or subject to further consultation).

#### Main Changes

WCS NEW - A new policy has been inserted to promote a minimum level of reuse and recycling capacity, to discourage new landfill capacity and to promote the development of the waste sector overall. The effects of this could give rise to an increase in waste transport. However, the related paragraphs 4.10-4.12 ensure the effective assessment and mitigation of any traffic implications will be properly considered at the planning application stage.

WCS3 – Amendments to this policy seek to restrict the development of landfill which (as above) may lead to an increase in waste transport distances as a consequence of the multiple handling of waste streams. Given that there is no certainty at this stage regarding the sites which might be developed for waste management or their number, type or capacity it is not possible to assess the implications of this change. However, it is considered that the requisite assessment of impacts at application stage (as set out at paragraphs 4.10-4.12 policy WCS4) will be adequate to ensure this is dealt with and the HA's interests protected.

WCS13 – The proposed amendments strengthen the protection given to environment and amenity and are not considered to be material in transport terms.

WSC7 – The proposed amendments provide clarification on the habitats which will benefit from environmental protection, including heritage assets and are not considered to be material in transport terms.



WCS NEW – The new policy, in response to the NPPF, confirms the Council's commitment to the presumption in favour of sustainable development and its intention to adopt a positive approach. Emphasis will be given to working with applicants to identify solutions and the benefit of pre-application advice. The HA notes that this form of policy has been issued by the Planning Inspectorate and is required to be included in all DPDs, without which they will be declared unsound.

#### Additional Changes

The additional changes are wide ranging but in our view do not affect the substance of the document or have any particular bearing on transport issues. Such changes include a re-emphasis (in paragraph 2.22a) that a reduction in transport emissions is a priority as part of the Waste Strategy.

It has been noted that the Highways Agency's request for an explicit reference to the our role as a consultee has not be incorporated. We consider this disappointing but do not regard it as significant in the context of the document has a whole.

#### Summary

In the context of the Highway Agency's previous responses to the Waste Core Strategy, our view remains that the document continues to be sound. The HA does not view the proposed changes as materially altering our previous position.

The inclusion of a new policy in relation to the NPPF is a requirement of all DPDs. The other new policy, emphasising the priority of recycling can be substantiated with reference to the existing requirements for traffic assessments at the application stage.

Therefore, the HA continues to view the WCS as sound and considers there are no outstanding areas requiring resolution before the amendments are finalised.

Yours sincerely



Stephen Williams  
NDD Midlands  
Email: [stephen.williams@highways.gsi.gov.uk](mailto:stephen.williams@highways.gsi.gov.uk)

## SC13-1645

**From:** Louise Brookes - BT Yahoo [REDACTED]  
**Sent:** 21 May 2012 14:53  
**To:** WCS (PEP)  
**Cc:** idkemp@sky.com  
**Subject:** Fw: Response to WCS and NPPF and evidence  
**Importance:** High

Dear Mr Dean,

Here is my submission in response to the WCS, and NPPF re sustainable developments. I include several attachments as evidence to back up my statements. I trust that my submission will be treated with integrity, and will be passed to the Inspector.

Thank you in anticipation.

I would also like to bring to your attention that when I access any WCC website including the WCS document, it causes problems for my computer. Please also make the inspector aware of this.

Below is a link, and to be sure it is accessible I have also copied the article below.

Regards

L Brookes

Commission calls for move up waste hierarchy  
<http://www.letsrecycle.com/news/latest-news/legislation/commission-calls-for-move-up-waste-hierarchy>

16 May 2012

- **The European Commission has said it will use both 'carrots and sticks' to ensure member states move waste up the waste hierarchy and comply with waste legislation.**

Speaking at a seminar on 'moving up the waste hierarchy – best practice examples' in Munich on Thursday (May 11), Michel Sponar, policy officer with the European Commission's environment directorate, explained that the 2008 Waste Framework Directive (WFD) requires member states to treat waste according to a five-step hierarchy. This places most importance on waste prevention followed by preparation for reuse, recycling, others forms of recovery (including incineration) and disposal.

The seminar was organised by the European Federation of Waste Management and Environmental Services (FEAD) and was held alongside the IFAT ENTSORGA trade fair ([see letsrecycle.com story](#)).

While Mr Sponar stressed the need for newer EU member states such as Bulgaria and Poland to divert more waste from landfill, he said older member states such as Germany and Denmark which are heavily reliant on incineration need to change their focus too, by sending more waste for recycling and composting.

And, he said all member states should prioritise waste prevention – and must produce Waste Prevention Plans by the end of 2013.

Mr Sponar said: "We support first prevention, then preparation for reuse, then recycling (composting), other recovery, then disposal. Our hierarchy is very clear.

"We are hoping that next year member states will produce waste prevention plans. We will maintain pressure on that."

## ***Funds***

Mr Sponar said the Commission would be aligning EU structural funds with the waste hierarchy to incentivise prevention, reuse and recycling which he described as a 'carrot'. But, he said that it would not hesitate to use a 'stick' and instigate infringement proceedings where the hierarchy was not met or other EU waste laws were not complied with.

Waste accounts for around 20% of the infringement cases handled by the DG Environment at present. Only last month (April 26), the Commission referred Bulgaria, Hungary, Poland and Slovakia to the EU Court of Justice for failing to meet the December 2010 deadline to transpose the Waste Framework Directive into national law.

## ***Instruments***

**"We hope more [incineration] capacity will be taken out of the market. In the end we could harm recycling performance"**

Frans Beckers, Van Gansewinkel Group

To help push waste up the hierarchy, Mr Sponar said member states needed to use the right economic instruments. Pointing to a recent EU report ([see letsrecycle.com story](#)), he said that landfill bans and fees proved to be the most effective.

As evidence of this, he pointed to comments made at the event by Matthew Farrow, director of policy at the UK's Environmental Services Association.

Mr Farrow said the landfill tax in the UK, which is currently £64 a tonne, had been very effective at reducing landfilling. He said: "It is quite a simple measure but it gives businesses predictability."

## ***Resources***

Mr Sponar said the waste hierarchy was important because demand for raw materials is expected to 'dramatically' increase by an estimated 75% over the next 25 years due to population growth and because of rising living standards in developing countries. The EU is also currently importing six times more resources than it is exporting.

The Commission, he explained, had reacted to these challenges by producing a number of strategies, most recently its Roadmap for a Resource Efficient Europe ([see letsrecycle.com story](#)) which looks at the importance of managing all resources sustainably.

The roadmap includes aspirational targets for 2020 including full implementation of EU waste law, waste generation per capita in decline and **recovery being limited to non-recyclable material**.

Mr Sponar said: "Really it is part of a resource access strategy. We are trying to put together those recycling products and those producing products."

## ***Burning***

Frans Beckers, a director of Dutch waste services company the Van Gansewinkel Group, picked up this thread by speaking of the importance of preserving resources rather than burning them.

Mr Beckers explained that his company imports RDF from the UK ([see letsrecycle.com story](#)) and Italy but had recently closed one incinerator due to overcapacity and urged others to follow suit.

He said: "We closed one of our incineration plants in the Rotterdam area. There is overcapacity in Germany and we hope some of our colleagues will follow suit. We hope more capacity will be taken out of the market. In the end we could harm recycling performance."

Mr Beckers said the problem also applied to biomass: "There is a lack of fuels. Too much is being burnt. We need to ensure we do not invest in too many biomass energy installations as we won't have the fuel any more."

Mr Beckers said Van Gansewinkel was increasingly positioning itself as a bank for raw materials rather than just a waste company – engaged in what he described as 'urban mining' – noting that there is more gold in a cubic metre of mobile phones than in a cubic metre of gold ore.

He said: "We are like the spiders in the web to provide materials for companies that are not able to create their own closed loops. For instance in the carpet industry we have created a closed loop in partnership with Desso. We have more than 170 cradle to cradle projects running at the moment."

## ***Germany***

The importance of driving waste up the hierarchy was also reinforced at the event by Dr Helge Wendenburg, director of the German Ministry of Environment.

The German government is currently at odds with the Commission over its transposition of the waste hierarchy into domestic law, because it has only implemented a three-stage hierarchy which puts recycling and energy recovery on a par. However, the ministry said it agreed that waste prevention should be a priority.

Dr Wendenburg said: "If we look at the waste hierarchy waste avoidance is the first step. We have to talk to the people designing electronic equipment, cars etc.

"Demand for materials is greater than what we can get from recycling. We need to consider if we should make European Directives for product design to respect resource efficiency."

## ***Arisings***

### ***Related Links***

[FEAD](#)

[European Commission - DG Environment](#)

Also at the event, Özgür Saki, from the European Environment Agency, gave an overview of waste arisings and management in Europe.

He explained that while waste management had improved, the majority of waste (45%) is still sent to landfill and waste arisings are growing or stagnating.

He said: "We support DG Environment and are also working on waste prevention among other things."

<http://www.letsrecycle.com/news/latest-news/legislation/commission-calls-for-move-up-waste-hierarchy>



## Worcestershire Waste Core Strategy and National Planning Policy Framework response

I would like to comment further on the WCS and in relation to the National Planning Policy Framework regarding and Sustainable Development.

I believe that all points raised are relevant to the aforementioned documents.

- The Waste Core Strategy should not be technology specific and should surely provide a comprehensive and transparent comparison of all alternative technologies and all costs involved, which should be available to the public. The WCS does not meet these criteria, and it seems that the council **are** supporting a specific technology, to the detriment of other technologies.
- I include a document from Mr Blagg Councillor with responsibility for waste. He gives an explanation as to why WCC asked their contractor to bring forward an Energy from Waste mass burn incinerator. There are other documents stating that it is the contractor who wishes to build the incinerator. Mr Blagg clearly does not entertain any other technology in spite of other technologies being used successfully and more cheaply by other councils, in other areas. He seems to have a poor understanding of the issues and up and coming technology, claiming that we need an incinerator to divert biogenic waste from landfill, having not grasped the benefits of anaerobic digesters.
- Mr Finch WCC financial services, has told me that it would harm the environment to collect food waste, and use AD. He seems to endorse transporting 200,000 tpa of waste to the north of the 2 counties and burning it, releasing emissions into a rural farming community. The area has the highest concentration of grade 1 agricultural land in the West Midlands. I therefore cannot have confidence in the council officials.
- Through conducting my own research I have concluded that anaerobic digestion would have many benefits, and include information from the AD association.
- It is WCC duty to move waste up the hierarchy, by utilizing the best options, but on 9th of February 2012 at a cabinet meeting, I believe that Mr Blagg stated when asked that the incinerator would probably cost £1billion, and also stated that we could not recycle everything, as it would bankrupt the council. This is a very perplexing statement, we should be trying to recycle as much as possible to prevent resource depletion. However, having obtained a breakdown of the costs of the waste contract from WCC I notice that we pay £5 million as a recycling supplement, I think that this is known as an up lift fee. Mr Blagg also states in the document that the valuable recyclates go to Envirosort , the contractors facility on the edge of Worcester. (Paid for by the public at a cost of approximately £12m I believe.)
- Mr Martin Finch confirmed that WCC obtain no financial value from selling the recycling and he explained that the contractor takes the 'risk, clearly there is little risk' and much profit to be made from an ever increasing demand for recyclates.
- This seems to be a very inequitable arrangement, perhaps meaning that contractual obligations prevent the best options being permitted, and that the tax payer is paying

twice, with all profit from recycling only benefiting the contractor and not the residents of Hereford and Worcestershire. This forces waste **down** the hierarchy.

- NB There have been 56 variations to the contract costing £49 million. Why?
- Also I believe that a community project in Hereford for an AD plant was not allowed to proceed, as the county council planned to have an incinerator. This would have diverted biogenic waste from landfill saving a considerable amount of landfill tax and would have been up and running by now.
- Also see attached a letter submitted to the Secretary of State from a group of Hereford County Councillors who like many residents in Worcestershire, feel that they have not been consulted on the WCS, which impacts on their constituents.
- The contractor appears to send a considerable amount of biogenic and mixed municipal waste to their own landfill. I believe that it produces methane which they are then capturing and selling to the national grid, do we obtain any value from this? We pay the landfill tax.
- At the public inquiry Mr Roberts who represented Mercia at the WCS inquiry stated that collecting food waste would be a compensatory situation for his clients. Is this because it would cause a loss of revenue from the power generated at the landfill? In spite of the contractor insisting that we desperately need divert waste from landfill.
- Why is it too expensive to collect food waste in Worcestershire and Herefordshire yet in other parts of the country, councils happily collect food waste?
- The contractor should fit around the strategy and not the other way around (CAPEL)
- EU legislation is moving away from incineration, due to such over capacity and resources depletion, placing even greater importance on moving waste up the waste hierarchy.
- I include an article about the Kent facility. Had an incinerator been built in Kidderminster in 2002 when it was proposed, we could be in a similar situation now. We could be in a worse situation in 2023 when the contract ends and the council have to make an **undisclosed balloon payment** to the company.
- There is approximately 40,000 tonnes of spare recycling capacity at the EnviroSort facility centrally located on the edge of Worcester and even more at Lawrence's Forge recycling in Kidderminster. Recycling should be maximised before WCC embarks on a large capital expenditure programme through PFI which we can ill afford.
- I learned from my MP Peter Luff that there are 2 new AD plants coming on line, one may even belong to the applicant, as it is at Hill and Moor where their landfill is. Letter attached.
- The collection and disposal authorities have a duty to cooperate and it seems that they are able to do so to incinerate, but not when it comes to food waste collections.
- Why aren't we working with people who own private AD plants who could take the waste locally, saving the council any risk of capital and maintenance expenditure? This would mean that any new facility needed, would be much smaller and so less expensive. Some of the utility companies would be only too pleased to take waste for existing and

planned AD plants. Why are WCC not working towards public private partnerships, to get best value for the tax payers?

- The WCS should be flexible, but it is restricted with only token gestures of utilizing a mix of technologies. It appears to advocate specific technology **SECTION 3. Managing waste as a resource. Paragraph 3.7 (page 35): the section in brown text and now scored out appears to demonstrate that WCC clearly had/ have specific technology in mind, and may not be open to better alternatives. Obstructing more beneficial methods and favouring an oversized incinerator proposal.**
- To commit to one huge and expensive facility which has to have a guaranteed waste stream for 25 years will surely prevents the council's legal obligations to move waste up the hierarchy.
- We would have to guarantee the feed stock for 25 years. I enclose an article about the problems now being faced in Europe through over capacity of incineration.
- WAIL also put forward an alternative solution combining AD and auto clave, this could see as much as £1 million tonnes recycled over several years, and is being put into practice in Wakefield.
- AD also produces energy from waste and a soil conditioner full of nutrients, and also has the opportunity to provide heat take off. It would be completely renewable energy. See enclosed article.
- Incineration depletes resources, and does not significantly contribute to power production. I believe only producing enough power for a few light bulbs in a home.
- I am also concerned that there seems to be an elaborate web of reasons why the geographical hierarchy is disregarded; it would seem, to justify choosing an inappropriate site for and inappropriate but specific technology; e.g. the proposed incinerator at Hartlebury.
- The Waste Core Strategy (WCS) is not supposed to be technology specific. However, in section **and A 6. Change to Paragraph 3.8 (page 35): the importance of adhering to the geographic hierarchy is highlighted then undermined, and text ( in brown and now crossed out) refers to** a thermal treatment facility with a through put of 250,000 tpa, and a stack of 80 metres.
- I also include a newspaper article and some waste figures demonstrating that the geographic hierarchy is ignored, and that waste arising data supports this. Worcester is central to both. This was also demonstrated at the public inquiry in 2002 when the incinerator in Kidderminster was rejected.
- **In Annex D Residual Options Appraisal July 2009 in WRATE Assumptions A2.1 Site Assumptions reference is made to a single site being close to Worcester City. This is because it is central to waste arising.**
- Lack of flexibility exacerbated by ignoring the geographic and waste hierarchy and choosing the wrong technology in the wrong place at the wrong time cannot be conducive to environmental or economic sustainability.

- Waste is falling as reported by Shanks plc by 9% 2011-2012. Reports from Eunomia bear this out, so it would not be prudent to commit to a technology which can only run at full capacity.
- Neither the WCS or the NPPF seek to enhance the protection of the Green Belt. Yet it would not adversely impact on either strategy/policy to protect the Green Belt. This is of great concern as only 1 % of the West Midlands is Green Belt land.
- Environmental protection in WCS is only offered to some areas indicating that some proposed technologies could be harmful to local ecology. In Hartlebury there should be no facility which could contaminate water courses as there are large underground aquifers, pools and streams which are rich in protected wildlife species such as Great Crested newts.
- Technologies chosen should reflect potential future water shortages e.g. AD does not require large amounts of water, where as I believe mass burn incineration needs approximately 960,000 litres of water per week. Adversely impacting on the farming community.
- WCC is not obligated to deal large quantities of commercial and industrial waste and so facilities should not be oversized to accommodate commercial opportunities for a contractor using public funding.
- It is of great concern that WCC will take on all financial risk for a facility costing at least £1 billion and probably much more, when the contract ends in 2023.

### **In conclusion**

**No large capital intensive facilities should be considered until recycling levels have been increased and biogenic waste including food waste is treated separately.**

**This should not be a compensatory situation and raises the question, are contractual obligations inhibiting WCC from having the inclination to fully explore best and most cost effective options to manage the waste hierarchy? Will this have a serious detrimental effect on sustainable development, from an economic social and environmental perspective?**

**Of concern is that fact that ERM have prepared the WCS, advised WCC to pass the planning application for the proposed incinerator and work closely with incinerator companies to get their planning applications passed.**

**I cannot agree that the WCS is sound, based on credible evidence of meets any of the other criteria.**

**I hope the inspector can understand my concerns. I do not have confidence in the council to deliver the most economically and environmentally sustainable strategy that they should.**



# **SC13-1645**

## **INDEX**

### **RESPONSE TO WCS AND NPPF**

RESPONSE TO WCS

RESPONSE TO NPPF

DOCUMENT BY CLLR A BLAGG

DATA WASTE SENT TO HILL AND MOOR

DATA FINANCIAL COST OF CONTRACT

WORCESTER NEWS ARTICLE

ANNEX D EXTRACT

LETTER FROM CLLR FELICITY NORMAN

AD ALTERNATIVE WASTE

LINK TO ARTICLE ABOUT EU CUTTING INCINERATION AND LANDFILL.

# SC13-1645

Site Name	Operator	Return Year	Return Period	Amount Tonnes	Origin Gov Region	Origin Sub Region	Origin	EW Code	Waste Cat	EW Code Waste Desc
MOOR	Services	2011	Qtr 1 (Jan-Mar)	6.76	West Midlands	Worcestershire	Worcestershire	20 03 07	Hhold/Ind/Com	bulky waste
MOOR	Services	2011	Qtr 1 (Jan-Mar)	1132.68	West Midlands	Worcestershire	Worcestershire	20 03 03	Hhold/Ind/Com	street-cleaning residues
MOOR	Services	2011	Qtr 1 (Jan-Mar)	25395.23	West Midlands	Worcestershire	Worcestershire	20 03 01	Hhold/Ind/Com	mixed municipal waste
MOOR	Services	2011	Qtr 1 (Jan-Mar)	5451.8	West Midlands	Worcestershire	Worcestershire	20 02 01	Hhold/Ind/Com	biodegradable waste
MOOR	Services	2011	Qtr 1 (Jan-Mar)	8.38	West Midlands	Worcestershire	Worcestershire	20 01 02	Hhold/Ind/Com	glass
MOOR	Services	2011	Qtr 1 (Jan-Mar)	8759.8	West Midlands	Worcestershire	Worcestershire	19 12 12	Hhold/Ind/Com	those mentioned in 19 12 11
MOOR	Services	2011	Qtr 1 (Jan-Mar)	116.78	West Midlands	Worcestershire	Worcestershire	19 12 09	Inert/C+D	minerals (for example sand, stones)
MOOR	Services	2011	Qtr 1 (Jan-Mar)	1465.4	West Midlands	Worcestershire	Worcestershire	17 05 04	Inert/C+D	soil and stones other than those mentioned in 17 05 03
MOOR	Services	2011	Qtr 1 (Jan-Mar)	2723.74	West Midlands	Worcestershire	Worcestershire	17 01 07	Inert/C+D	mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
MOOR	Services	2011	Qtr 1 (Jan-Mar)	200.32	West Midlands	Worcestershire	Worcestershire	02 03 04	Hhold/Ind/Com	materials unsuitable for consumption or processing
MOOR	Services	2011	Qtr 1 (Jan-Mar)	10683.76	West Midlands	Herefordshire	The County of	19 12 12	Hhold/Ind/Com	those mentioned in 19 12 11
MOOR	Services	2010	Qtr 4 (Oct-Dec)	1015.54	West Midlands	Worcestershire	Worcestershire	20 03 03	Hhold/Ind/Com	street-cleaning residues
MOOR	Services	2010	Qtr 4 (Oct-Dec)	23724.58	West Midlands	Worcestershire	Worcestershire	20 03 01	Hhold/Ind/Com	mixed municipal waste
MOOR	Services	2010	Qtr 4 (Oct-Dec)	2945.3	West Midlands	Worcestershire	Worcestershire	20 02 01	Hhold/Ind/Com	biodegradable waste
MOOR	Services	2010	Qtr 4 (Oct-Dec)	4.22	West Midlands	Worcestershire	Worcestershire	20 01 23*	Hazardous	discarded equipment containing chlorofluorocarbons
MOOR	Services	2010	Qtr 4 (Oct-Dec)	139.44	West Midlands	Worcestershire	Worcestershire	20 01 02	Hhold/Ind/Com	glass
MOOR	Services	2010	Qtr 4 (Oct-Dec)	16822.46	West Midlands	Worcestershire	Worcestershire	19 12 12	Hhold/Ind/Com	those mentioned in 19 12 11
MOOR	Services	2010	Qtr 4 (Oct-Dec)	556.34	West Midlands	Worcestershire	Worcestershire	19 12 09	Inert/C+D	minerals (for example sand, stones)
MOOR	Services	2010	Qtr 4 (Oct-Dec)	1319.6	West Midlands	Worcestershire	Worcestershire	17 05 04	Inert/C+D	soil and stones other than those mentioned in 17 05 03
MOOR	Services	2010	Qtr 4 (Oct-Dec)	1865.58	West Midlands	Worcestershire	Worcestershire	17 01 07	Inert/C+D	mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
MOOR	Services	2010	Qtr 4 (Oct-Dec)	14.12	West Midlands	Worcestershire	Worcestershire	16 05 04*	Hazardous	gases in pressure containers (including halons) containing dangerous substances
MOOR	Services	2010	Qtr 4 (Oct-Dec)	70.2	West Midlands	Worcestershire	Worcestershire	02 03 04	Hhold/Ind/Com	materials unsuitable for consumption or processing
MOOR	Services	2010	Qtr 3 (Jul-Sep)	1041.62	West Midlands	Worcestershire	Worcestershire	20 03 03	Hhold/Ind/Com	street-cleaning residues
MOOR	Services	2010	Qtr 3 (Jul-Sep)	27864.4	West Midlands	Worcestershire	Worcestershire	20 03 01	Hhold/Ind/Com	mixed municipal waste
MOOR	Services	2010	Qtr 3 (Jul-Sep)	7030.02	West Midlands	Worcestershire	Worcestershire	20 02 01	Hhold/Ind/Com	biodegradable waste
MOOR	Services	2010	Qtr 3 (Jul-Sep)	15521.98	West Midlands	Worcestershire	Worcestershire	19 12 12	Hhold/Ind/Com	those mentioned in 19 12 11
MOOR	Services	2010	Qtr 3 (Jul-Sep)	239.08	West Midlands	Worcestershire	Worcestershire	19 12 09	Inert/C+D	minerals (for example sand, stones)
MOOR	Services	2010	Qtr 3 (Jul-Sep)	3140.42	West Midlands	Worcestershire	Worcestershire	17 05 04	Inert/C+D	soil and stones other than those mentioned in 17 05 03
MOOR	Services	2010	Qtr 3 (Jul-Sep)	5.06	West Midlands	Worcestershire	Worcestershire	17 02 01	Inert/C+D	wood
MOOR	Services	2010	Qtr 3 (Jul-Sep)	925.96	West Midlands	Worcestershire	Worcestershire	17 01 07	Inert/C+D	mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
MOOR	Services	2010	Qtr 3 (Jul-Sep)	157.18	West Midlands	Worcestershire	Worcestershire	02 03 04	Hhold/Ind/Com	materials unsuitable for consumption or processing
MOOR	Services	2010	Qtr 2 (Apr-Jun)	19.38	West Midlands	Worcestershire	Worcestershire	20 03 07	Hhold/Ind/Com	bulky waste
MOOR	Services	2010	Qtr 2 (Apr-Jun)	1002.5	West Midlands	Worcestershire	Worcestershire	20 03 03	Hhold/Ind/Com	street-cleaning residues
MOOR	Services	2010	Qtr 2 (Apr-Jun)	28246.58	West Midlands	Worcestershire	Worcestershire	20 03 01	Hhold/Ind/Com	mixed municipal waste
MOOR	Services	2010	Qtr 2 (Apr-Jun)	10596.44	West Midlands	Worcestershire	Worcestershire	20 02 01	Hhold/Ind/Com	biodegradable waste
MOOR	Services	2010	Qtr 2 (Apr-Jun)	1486.28	West Midlands	Worcestershire	Worcestershire	19 12 12	Hhold/Ind/Com	those mentioned in 19 12 11
MOOR	Services	2010	Qtr 2 (Apr-Jun)	341.44	West Midlands	Worcestershire	Worcestershire	19 12 09	Inert/C+D	minerals (for example sand, stones)
MOOR	Services	2010	Qtr 2 (Apr-Jun)	3708.76	West Midlands	Worcestershire	Worcestershire	17 05 04	Inert/C+D	soil and stones other than those mentioned in 17 05 03
MOOR	Services	2010	Qtr 2 (Apr-Jun)	1370.68	West Midlands	Worcestershire	Worcestershire	17 01 07	Inert/C+D	mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
MOOR	Services	2010	Qtr 2 (Apr-Jun)	92.9	West Midlands	Worcestershire	Worcestershire	02 03 04	Hhold/Ind/Com	materials unsuitable for consumption or processing
MOOR	Services	2010	Qtr 2 (Apr-Jun)	11394.78	West Midlands	Herefordshire	The County of	19 12 12	Hhold/Ind/Com	those mentioned in 19 12 11
MOOR	Services	2010	Qtr 1 (Jan-Mar)	998.62	West Midlands	Worcestershire	Worcestershire	20 03 03	Hhold/Ind/Com	street-cleaning residues
MOOR	Services	2010	Qtr 1 (Jan-Mar)	25906.31	West Midlands	Worcestershire	Worcestershire	20 03 01	Hhold/Ind/Com	mixed municipal waste
MOOR	Services	2010	Qtr 1 (Jan-Mar)	2106.4	West Midlands	Worcestershire	Worcestershire	20 02 01	Hhold/Ind/Com	biodegradable waste
MOOR	Services	2010	Qtr 1 (Jan-Mar)	1775.4	West Midlands	Worcestershire	Worcestershire	19 12 12	Hhold/Ind/Com	those mentioned in 19 12 11
MOOR	Services	2010	Qtr 1 (Jan-Mar)	452.22	West Midlands	Worcestershire	Worcestershire	19 12 09	Inert/C+D	minerals (for example sand, stones)
MOOR	Services	2010	Qtr 1 (Jan-Mar)	3182.3	West Midlands	Worcestershire	Worcestershire	17 05 04	Inert/C+D	soil and stones other than those mentioned in 17 05 03
MOOR	Services	2010	Qtr 1 (Jan-Mar)	3119.26	West Midlands	Worcestershire	Worcestershire	17 01 07	Inert/C+D	mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
MOOR	Services	2010	Qtr 1 (Jan-Mar)	155.92	West Midlands	Worcestershire	Worcestershire	02 03 04	Hhold/Ind/Com	materials unsuitable for consumption or processing
MOOR	Services	2010	Qtr 1 (Jan-Mar)	10970.62	West Midlands	Herefordshire	The County of	19 12 12	Hhold/Ind/Com	those mentioned in 19 12 11

## SC13-1645

Dear Ms Symes,

Here is my response to the National Planning Policy Framework. I made several submissions to the public enquiry, and yet was not asked to comment on the new planning policy framework or even notified of it.

Included are quotes from the framework and relevant comments.

Ministerial foreword by Rt Hon Greg Clark MP Minister for Planning, highlights the importance of our natural environment, our wellbeing and habitats.

*'Green Belt land that has been depleted of diversity can be refilled by nature'*

*'Sustainable development is about positive growth – making economic, environmental and social progress for this and future generations.'*

*'Planning must be a creative exercise in finding ways to enhance and improve the places in which we live our lives.'*

1. The National Planning Policy Framework sets out the Government's planning policies for England, but other Government documents (that have not been revoked) also set out Government policy to be applied. These include;
  - PPS10 The Waste Planning Policy Statement.
  - PPS10 Companion Guide could also be relevant, e.g. the advice on waste forecasting at paragraph 4.13,
  - EN-1 (Overarching National Policy Statement for Energy)
  - EN-3 (National Policy Statement for Renewable Energy Infrastructure) may apply to incinerators with a capacity above 50MWe, but the policy statements may also be relevant to smaller facilities. ( ref AD)
  - National policy statements form part of the overall framework of national planning policy, and are a material consideration in decisions on planning applications.
  - It is expected that the NWMP will be published by the end of 2013 and will contain an updated version of PPS10. Until then, PPS10 ("The Waste Planning Policy Statement") remains in force.
  - Wychavon local plan, does not allow buildings on the proposed site higher than 15 metres.
2. Relevant EU obligations (revised Waste Framework Directive)
  - EU regulations promote recycling and do not encourage burning.
  - Worcestershire and Herefordshire's recycling targets are only 50% by 2020,
  - 70% to 90% of waste may be recyclable, so recyclates would be burned.
  - This could be at odds with EU obligations.
  - Burning would prevent recycling and waste minimisation as a feed stock would have to be guaranteed for the life of the plant.
  - European and National law requires councils to move waste up the Waste Hierarchy (The Waste (England and Wales) Regulations 2011) away from

disposal and recovery to recycling, composting and redesign. Incineration is classed as disposal and at best low tier recovery.

### Protecting Green Belt

- The development would harm the open character and tranquil nature of the Green Belt, with a devastating visual impact.
- Only 1% of the West Midlands is Green Belt
- The area has highest concentration of grade 1 agricultural land in the West Midlands.
- Government states that Green Belt Land should be protected.
- No very special circumstances exist to warrant the development. Comparisons are only made with landfill, these are now outdated.
- Waste going to landfill is falling dramatically and CO2 is now captured.

## Achieving sustainable development

### Economic

- The Outline Business Case Lite indicates that the capital costs could potentially exceed £200 M (£166 M with a tolerance of 50%). Lifecycle/ maintenance costs along with interest and exchange rate rises are not even known, so comparables cannot be made with other cheaper alternatives.
- The proposal is an old style PFI contract; Worcester hospital has already cost 10 times its original capital costs.
- MP Robin Walker states that MPs should act collectively to bring PFI costs down. The Treasury is carrying out an inquiry into this and any decision should wait until the findings can be reviewed.
- Avoiding LATS tax was a significant motivation for choosing incineration but this will end potentially 2 years prior to an incinerator becoming functional
- The OBCL lists as a risk, 'Bottom Ash/Fly Ash legislative changes lead to reclassification as active waste'. This would affect 25-30% of tonnage.
- Cost comparisons have not been made with other technologies or modular mix of technologies which would enable waste to be moved up the waste hierarchy and fulfil the sustainable development criteria of the NPPF.
- It is stated in Worcester's JMWMS that it could be financially beneficial for WCC to use other (than incineration) methods of food waste disposal. This would support government policy to promote food waste collections and AD. But these were not included in the Options Appraisal. There was no liaison with the districts to assess whether any increase in collection costs could be (more than) offset by these gains. Para 180 of the NPPF states 'in two tier areas county and district authorities should cooperate with each other on relevant issues'.



- There have been no comparisons of the renewable energy capability of AD in relation to incineration.
- The carbon gains from using AD (as AD EfW relative to incineration EfW)) and carbon sequestration through use of the organic residue as a soil enhancer have not been assessed.
- WRAP gate fees report show that incineration (and EfW) is the most expensive waste disposal options. The average gate fee for incinerators built after 2010 is now quoted as £92 or £73 if they are an EfW facility. Last year it was quoted as being up to £130 pt , and given capital and lifecycle costs I am not sure why this has suddenly fallen so sharply. All but around 5% of waste being burnt is now being treated far more cheaply by alternative greener technologies.
- 68% of waste is organic and can be treated by Anaerobic Digestion or composting at a cost of £43pt or £24pt respectively. Most of the remainder; plastics, metals, wood and glass are processed by MRFs (Material Recycling Facilities) at a gate fee of £4! The use of incineration with government subsidy and LA risk responsibility is anti-competitive in a waste market which is now highly competitive with private and third party waste processing facilities.
- As recycling increases Mercia envisages selling spare capacity to outside waste. However the overall cost to ratepayers of processing a tonne (including capital and life cycle costs) is likely to be far more than the gate fees noted above and will result in WCC subsidising the burning of other people's waste. Mercia are already using third party MRF and this could be extended. A full feasibility study for community AD has been undertaken by the Lead Project but the financial and social benefits have not yet been explored.
- The economic risks envisaged in the OBCL, including future environmental legislation such as carbon, ash and incineration taxes, have not been costed nor how such additional costs would be met by the council.
- The economic life of the incinerator is over 30 years and this cannot provide the 'sufficient flexibility to deal with rapid change' (Para 14 NPPF)
- The additional VfM benefits of alternative modular systems of waste treatments have not been factored in. There are many studies which show the greater number of jobs and new businesses associated with AD, re-use and repair as well as the impetus to innovation and research into 'Eco-design' for waste prevention which is developing as a major part of the green materials revolution.
- Long-term commitment to a giant incinerator will stifle sustainable economic growth and competition.
- A 200,000 tonne incinerator is therefore not the best available method of dealing with waste to fulfil the economic sustainability criteria of the NPPF

**QUOTE FROM WORCESTER NEWS Thursday 3rd February 2011**

***"We've got to look at the whole picture."***

Herefordshire MP Jess Norman **THE DAILY TELEGRAPH 15<sup>th</sup> November 2011**

Mr Norman refers to a PFI school contract in Bromsgrove where installation of 3 locks cost £961.85, but 'lifecycle' costs meant a total of £2,246.25

When built the facility will only employ 42 people. Many more jobs in recycling may be lost as a result of this facility.

Old Style PFI's are protected and ring fenced. This could be to the detriment of other services and investment opportunities, adversely affecting sustainable development.

***Residents trust that ALL local MP's will ensure that they are acquainted with the financial facts of this contract.***

## A social role – healthy communities

- Public perception means that people's rational fear of an incinerator would adversely affect their quality of life and well being
- The site sits in a bowl, and temperature inversion occurs regularly. This would hold any toxins in the air for prolonged periods of time, which would not occur on a more open site.
- The public often has little confidence in The Environment Agency and Health Protection Agency.
- Planning and permit conditions are flexible and the public has little confidence in them.
- A genuine fear is understandable and rational, and this in itself could be of great detriment to quality of life. This will not enhance social cohesion or promote health within the community.

## Air quality

*The EU has set mandatory air quality targets for certain pollutants. The UK is at present failing to meet EU targets for ambient concentrations of particulate matter (PM10) and nitrogen dioxide (NO2).* The applicant has indicated in previous documentation that nitrogen/nitrous oxides emitted from the chimney would equate to 7km of a typical motorway per hour.

Traffic is the biggest producer of PM10, we will be subjected to a significant increase in traffic.

PM 2.5 are not measured in the UK but are in the USA. This is unacceptable.

The Health Protection Agency has recently announced research into low birth weights, stillbirths and foetal abnormalities adjacent to incinerators. The results of this should be known before the incinerator decision is taken

## Community involvement.

- There has been no relevant community involvement with local people , and some
- Hereford County Councillors also claim they have not been informed of their options.

### **The planning system should play an active role in guiding development to sustainable solutions.**

- Refusing unsustainable development such as mass burn incinerators would mean that such refusals would be an effective way of guiding development to sustainable solutions; such as increased recycling, AD, composting and autoclaving such as in Wakefield.

### **Objectively assessed**

- A reassessment of all options is required to be objective as current comparisons are only made with landfill, when there are better cheaper methods of dealing with waste than either landfill or incineration, such as reduce, reuse, recycle, AD, composting and Auto clave .
- LATS tax will be abolished in 2013 reducing costs, as waste going to landfill has fallen dramatically.
- Co2 emissions from landfill are now captured and turned into energy from waste.

### **Requiring good design**

#### **Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development**

- Decentralised energy: Local renewable energy and local low-carbon energy usually but not always on a relatively small scale encompassing a diverse range of technologies.
- Good design is subjective, but will not mitigate inappropriateness, if the facility is out of scale with the open character of the Green Belt, and the rural location.

### **Sufficient flexibility to adapt to rapid change**

- Cheaper more modular technology is preferable, to allow greater flexibility.
- This could arguably include higher than anticipated increases in recycling and lower than anticipated waste arisings.

### **Low carbon future / meeting the challenge of climate change**

Incineration hampers efforts to move towards a low carbon future because incineration releases unnecessary greenhouse gas emissions. Mixed waste incinerators rely upon a notable fraction of fossil-based feedstock (e.g. plastic), and this is a finite resource that does not occur naturally and repeatedly in the environment. Even the biogenic material is in a processed form that does not occur naturally and repeatedly in the environment. As such, energy from incinerators should not be consistent with the definition of renewable energy provided within the NPPF. We need a sustainable gas supply.

This understanding is consistent with the reasoning by the Inspector in the Ardley decision, with which the Secretary of State concurred, that: "...*electricity from EfW is not an energy flow which occurs naturally and repeatedly in the environment*" [PINS ref 2119454, SoS Decision Letter Paragraph 25, and Inspector's Report Paragraph 16.84].

## Conserving and enhancing the natural environment

The proposal in this location will not enhance or conserve the natural environment. To reiterate points raised, there will be increased traffic, stack emissions, reduced air quality, a **depletion in water**, potential loss of habitats. In addition there will be light pollution, and tonal noise pollution.

If the new planning system is open, transparent and objective we hope that the Secretary of State will refuse permission for this inappropriate development. No very special circumstances have been proven, and more appropriate and cheaper technology exists.



## **Why Worcestershire have asked their contractors to commission an Energy from Waste Plant with Combined Heat and Power.**

Worcestershire and Herefordshire have a Joint Municipal Waste Management Strategy for 2004-2034 which has been signed up to by the two County Authorities and all six Worcestershire District Councils.

The original document and The JMWMS first Review in 2009 can all be found on the web at

<http://www.worcestershire.gov.uk/cms/community-and-living/waste-management/waste-strategy.aspx>

The revision, replaces the original Joint Municipal Waste Management Strategy (first published 2004) and has been in the public domain since 2009.

In reviewing the Strategy we have looked at the wide range of options available to us, for example preventing and reusing waste, recycling and composting waste and dealing with any remaining waste that cannot be re-used or recycled.

### **The 2009 document has the following sections:**

- Headline Document
- Annex A - Waste Growth
- Annex B – Waste Prevention
- Annex C – Recycling and Composting Options Appraisal
- Annex D - Residual Waste Options Appraisal
- Annex E – Scoping Report
- Annex F - Strategic Environmental Assessment
- Annex G - Achievements so Far
- Annex H – Consultation Process & Outcomes
- Annex I – Action Plan
- Annex J – Glossary

### **Highlights from the strategy are:**

#### 3.1.2

Local Authorities in Herefordshire and Worcestershire will adopt the following Waste

Hierarchy as a template for their approach to Waste Management, ensuring that waste is prevented wherever possible first before considering other options.

Prevention

Re-use

Recycle/Compost

Energy Recovery  
Safe disposal to landfill

### 3.6.5 Our Recovery Target is:

By 2015 or earlier if practicable, we will recover value from a minimum of 78% of municipal waste.

#### **Achieving the Target:**

The Partnership will work together to reduce the amount of biodegradable municipal waste landfilled in order to meet the yearly allowances set by Government under the Landfill Allowance Trading Scheme. In particular in target years as below:

154,164 tonnes during April 2009 to March 2010

102,684 tonnes during April 2012 to March 2013

71,851 tonnes during April 2019 to March 2020

#### **Residual Waste**

We have been working hard on waste reduction campaigns both locally and nationally, particularly the Love Food Hate Waste campaign to try and reduce food and biodegradable waste entering the system. We feel it is better for the environment and finances not to have the waste in the first place rather than build expensive disposal solutions. We have worked with our contractors and partners on re-use solutions particularly involving the charitable sector and of course we have built and opened EnviroSort. The success of recycling has been remarkable with Worcester City being consistently in the national top ten recyclers and other Worcestershire Districts not far behind. This plant deals with high value recyclates such as plastics, glass and metals.

This leaves us with residual waste (i.e. the stuff that goes in the black or grey bins). Annex D - Residual Waste Options Appraisal devotes 49 pages to how this should be done.

#### ***1.3.1 Developing a Long List***

A long list of generic technology types was initially identified.

- Mass burn incineration;
- Energy from Waste (EfW);
- Mechanical Biological Treatment (MBT) with Anaerobic Digestion (AD);
- MBT producing Refuse Derived Fuel (RDF);
- Gasification and pyrolysis (Advanced Thermal Treatment (ATT));

- Plasma Arc; and
- Autoclave.

### ***1.3.2 Developing a Short List***

The JMWMS aims to view waste as a resource and generate the most out of the residual waste it produces. For that reason mass burn incineration (combustion of waste without the generation of energy or heat) was not considered an option worth taking forward to the assessment.

Advanced Thermal Treatment (ATT) of untreated residual MSW has not been proven on a large scale in either the UK or Europe. It is essential that any option identified by the Partnership works and can be delivered. Therefore, it was considered to review the performance of ATT only in conjunction with a pre treatment technology (MBT) rather than in isolation.

Plasma Arc technology was also felt to be in early development thus not suitable for further consideration at this stage.

The amount of waste to be treated was worked out at 250,000 tonnes per annum.

Options were considered for provision of: one, two, or three or more facilities. The proposal for three or more facilities was dismissed as it was not considered appropriate for the capacity required in terms economies of scale and the risks associated with site availability and deliverability.

Currently the Partnership export 30,000tpa of residual waste to the energy from waste facilities in the West Midlands.

**The following final list of options to be appraised was agreed.**

- Option A - 1 site EfW
- Option B - 1 site EfW with CHP
- Option C - 2 site MBT with on site combustion
- Option D - 2 site MBT with off site combustion
- Option E - 1 site autoclave
- Option F - 2 site autoclave
- Option G - Out of county EfW

Each of the above options was assessed by the following criteria and option B came out consistently on top overall and the full analysis can be found in the document.

### **Criteria**

Environmental Criteria  
Resource Depletion  
Air Acidification  
Greenhouse Gas Emissions  
Freshwater aquatic ecotoxicity  
Eutrophication  
Financial and Risk Criteria  
Financial Costs  
Reliability of Delivery  
Planning Risk  
Compliance with Policy  
Flexibility  
End Product Liability  
Social Criteria  
Transport  
Health  
It

Obviously we spoke to our own Waste and Environmental consultants on the outcome of these findings before publishing them and commissioning our contractor to design and build Energy from Waste –Combined Heat and Power plant. We were reassured that the health risks of such a plant were lower than the ambient problems already existing at a site and the Health Protection Agency has stated that “The Health risks of a modern well run EFW plant are so small as to be not even worth monitoring”. Such plants have sophisticated filtering systems and are monitored by the Environment Agency (EA) to a strict code. The EA have recently given a license to the contractor for the running of a facility of type and size proposed.

## **Planning**

We then commissioned Mercia Waste to design and seek a site for an EFW-CHP plant. There was a long list of over 70 sites initially identified and many were ruled out straight away.

The short list was derived due to the need to have most efficient access to the majority of waste arisings and have a facility to easily connect to the national grid and have other suitable industrial or commercial buildings nearby which could use the heat/power. The Hartlebury site was chosen after it was found that the first site in Alvechurch had a restrictive covenant on it. Hartlebury was second but a close second and way ahead of others in the list. As the major centre of population is in North Worcestershire it is not surprising that the top two sites were in that area.



Once a site was chosen Mercia waste applied for planning permission with Worcestershire County Council (WCC) who are the legal body who authorise such strategic sites. Mercia held public consultation meetings at the Trading Estate from the beginning as they realized from their experiences with EnviroSort that local public confidence was vital. A thorough document was produced and published right at the beginning of the process. About 99% of the questions asked by members of the public can be answered if they read this document which covers Environment, Technology, Transport and a multitude of other things. It is not true to say that anyone has been kept in the dark, indeed WCC extended the public consultation period over the normal maximum to give the public a chance to respond to this important application. There was even a second period of public consultation on specific environmental matters. Mercia Waste held seminars for members and were comprehensive about the details of the techniques used and why. At the Planning Committee Meeting on March 1<sup>st</sup> there was a unanimous decision in favour of the application showing total cross party support in the project.

## **Problems and costs associated with other technologies**

### **Option A - 1 site EfW**

EFW in this sense is just an incinerator and doesn't use the heat to generate electricity or power and so the CHP bit was vital as an energy recovery resource.

### **Option C - 2 site MBT with on site combustion**

MBT stands for Mechanical Biological Treatment: This is basically shredded up the material which powerful machinery and then treating it biologically. This normally has to be in-vitro treatment. i.e. within a contained vessel. Traditional garden waste composting is done in open windrows but with general waste sufficient heat needs to be generated to make the process work.

Many by products of so called alternative methods of disposal are Refuse Derived Fuels (RDF) which are basically large pellets which then have to be burned in a licensed and controlled plant.

In an EFW-CVHP plant material is in the burners for less than half an hour. In this system it can take many weeks to achieve the same outcome and dangerous by products such as methane can be made. Obviously to have a burner on site means more expense in building extra facilities. Lancashire County Council has just started a PFI contract using MBT and it is not cheap. It is costing many hundreds of millions of pounds.

### **Option D - 2 site MBT with off site combustion**

Same problems as above but of course there will be extra lorry movements to move the material to another part of the country. Therefore more pollution, time, etc.

### **Option E - 1 site autoclave**

Autoclave is a method of steaming materials into a pulp and then using pressure to produce tiles of finished material. Our contractor did get planning permission for an autoclave plant at Hartlebury but this was never built as there was no commercial market for the tiles and they would have had to be landfilled which rather defeated the object. All these so called wonder technologies need to be treated with caution. The Sterecycle Autoclave Plant in Rotherham blew up in January of this year killing one worker and seriously injuring others. One of the good features of modern EFW-CHP technology is that it is reliable and state of the art.

### **Option F - 2 site autoclave**

Same as above but with even more cost of building and getting planning permission and more lorry movements to transport to and from. Incidentally there was a protest in Tenbury Wells recently to oppose a biomass plant from being built (i.e woodchips for boilers). The protestors who say that they are only against the technology we are proposing are being a bit disingenuous as we know there will be protestors for whatever techniques we come up with. British people don't like change in their backyards.

### **Option G - Out of county EfW**

We use Coventry now and have used Allington in Kent. This is expensive in lorry movements and as we don't own the facilities we are at the end of the queue in getting a beneficial gate fee. i.e price we pay to owners. If you have a large scale contract with a contractor then you often get a long term price which can be held for as long as thirty years This is vital in planning Council budgets.

### **Anaerobic Digestion:**

This was seen as the panacea of all ills but only deals with biodegradable waste and therefore not the majority of our residual waste. An AD plant on its own wouldn't cope with our needs. They are slightly cheaper to run but you get less for your money. They have problems associated with them. Several have blown up do to valves becoming blocked with rotting material. They take a long time to process material and the by products are a kind of soil or liquid. Both cannot be spread on the land if they have not been processed right due to the temperatures possibly not killing all the bacteria. The EA are very conscious of not starting another Foot and Mouth epidemic, or worse.

## Costs

We used the national WRATE standards for analysis of process and costs. WRATE calculates the potential impacts of all stages in the collection, management and processing of municipal waste. The calculation takes account of the infrastructure and its operation as well as any benefits associated with materials recycling and energy recovery. Costs of different processes are notoriously difficult to quantify. In 2008 WRAP (The Government's Waste and Resources Action Programme) found the figures below. When people quote them though they don't take into consideration the costs of collecting and administration. For instance Wychavon collect food waste separately which has to have extra lorry movements and staff to do this and then take the material to a specialist facility and so increasing costs.

As I've said we want to minimise food waste coming into the system but that which does can be as useful fuel in an EFW-CHP plant and therefore helps derive the electricity or hot water supply and therefore has its energy recovered.

### Summary information on gate fees 2008 figures Source

[http://www.wrap.org.uk/downloads/W504GateFeesReport\\_FINAL.733b65f9.5755.pdf](http://www.wrap.org.uk/downloads/W504GateFeesReport_FINAL.733b65f9.5755.pdf)

#### Treatment Grade / material / Median Range type of facility

**MRF** Cans/plastic/paper/card £21 -£4 - £70

The above plus glass £28 n.a.

**Composting** Open-air windrow £22.50 £17 - £33

In vessel £40 £20 - £69

**Anaerobic digestion** n.a. £30 - £60

**Landfill** Gate fee only £21 £11 - £40

Gate fee plus landfill tax £45 £35 - £64

**Incineration** All facilities £71 £31 - £136

Post-2000 facilities £80 £65 - £136

**MBT** £53 n.a.

**Wood reprocessors** Grade A £8 £0 - £16

Grade B £23 £16.50 - £30

Grade D £37 £27 - £47

## Conclusions

We want to reduce waste, reuse what we can recycle others and only then have a solution for the residual waste. EFW-CHP is a one size fits all approach which takes the material and uses it to make power. Items such as metals are sorted

out after incineration and then sold as recyclates. Bottom ash can be used in the building industry.

Other solutions have environmental problems. If there is toxic material then it will have to be isolated in whatever process you choose and some of the new ones aren't proven technology as yet.

The costs of new solutions which can look lower are due to the fact that they do not cover all waste therefore you need more than one solution and extra collections and staff to achieve the end product. They also take longer to process. All of this means that they are not cheap solutions.

Some people have called for more recycling. We already recycle high value items but if it costs £10 a ton to recycle material which only has a market value of £2 per ton then that is not a viable option for Councils or Commercial contractors. As I've said though EFW-CHP does recycle some material in a single process.

Waste is not a cheap business. Landfill is medieval and I for one am glad that the government is keeping landfill taxes which will no doubt grow. It is important that we get on with the job as soon as possible before these costs kick in.

Anthony Blagg  
June 2011

# SC13-1645

	2010 - 2011	2011 - 2012
<u>Contract Payments</u>		
Baseline Payment	£8,774,846	£8,885,910
Recycling Supplement	£5,898,608	£6,243,027
Composting Supplement	£494,730	£570,938
Landfill Tax	£8,035,691	£9,803,066
Household Waste Site Payment	£1,820,504	£1,867,736
Other payments	£33,050	£40,123
LATS landfill useage		£2,500
	<u>£25,057,429</u>	<u>£27,413,300</u>
<u>Variations</u>		
1 Ozone Depleting Substances Regulations	£0	
4 Use of 3rd party landfill sites	£495,280	£399,291
8 Use of regional WTE plants	£1,142,489	£1,463,530
10 Provision of bulking facilities	0	
14 Leominster storage/transfer of kerbside recyclables	£7,452	£5,628
15 Continuation of Tenbury HWS extende opening hours	£24,494	£26,143
16 HWS improvement trial Reddich/Bilford	0	
17 Landfill (England and Wales) Regulations 2002 -Tyres	£64,206	£66,748
18 Landfill (England and Wales) Regulations 2002 - Asbestos	£36,654	£36,200
19 Bromsgrove Transfer Station	£375,297	£376,245
20, 21, 35, 38, 42, 47, 55 Use of 3rd party composting facilities	£587,371	£626,316
22, 32, 39, 41 HWS improvements to increase recycling	£1,741,819	£1,758,737
23 Landfill (England and Wales) Regulations 2002/Hazardous Waste Regulations 2005 - CRTs	0	
24 Landfill (England and Wales) Regulations 2002/Hazardous Waste Regulations 2005 - Fluorescent Tubes	0	
27 Use of 3rd party MRFs	-£335,558	
28 Hazardous Waste reporting requirements	£5,231	£4,723
29 Aggregates Levy	£10,000	-£10,000
30 PPC permit	£167,727	£213,232
40, 52 WEEE Regulations	0	£124,853
44 Food waste composting	£26,417	£47,963
50 Plasterboard	£50,000	£60,660
51 EnviroSort MRF	£1,883,392	£1,674,914
<b>TOTAL</b>	<u><b>£31,339,701</b></u>	<u><b>£34,288,484</b></u>



## **Put incinerator on edge of city**

7:10am Friday **17th April 2009** in [News By David Paine](#), @davidpaineWN #worcsnews

**THE outskirts of Worcester would be the best location to build a massive waste incinerator, according to a new report.**

**But [Worcestershire County Council](#) said that is based purely on geographical evidence compiled by a computer programme and does not mean that will be where one is developed.**

**Any plan to build such a controversial structure just off junction six (Worcester north) of the [M5](#) is almost bound to be met with fierce opposition given the uproar which surrounded the development of a new recycling facility at Norton.**

Robert Wilkins, a Worcester resident who is also a member of One Planet Worcester, said he had reservations about the incinerator idea from a technical and health and safety point of view.

"I don't think it's a particularly friendly technique to have near a residential area," he said. "It's something that's going to be controversial wherever you place it."

The first review of the Joint Municipal Waste Management Strategy for Herefordshire and Worcestershire 2004-2034 – a document which sets out how the councils collect and treat waste from homes and businesses – is currently out for consultation until Friday, May 15.

**It highlights a site "close to Worcester city on the [M5](#) corridor" as being one of the main "assumed" sites that the county council's private waste contractor [Mercia Waste](#) could build a PFI-funded waste processing plant.**

Creating two plants using locations at Hartlebury and one at Madley in Herefordshire are also in the running. Both of those sites already have planning permission to build autoclave facilities but new applications, should they be chosen, will have to be submitted if work does not start at some point this year.

**A [Worcestershire County Council](#) spokesman said the Worcester site was chosen because it is approximately**

**at the centre of where waste comes from across the two counties and because it would be easily accessible from existing transfer stations in Bromsgrove, Redditch, Leominster and Hereford. The spokesman said using indicative locations enabled officers to assess the “relative environmental benefits and burdens of each option” using an [Environment Agency](#) tool.**

“The Residual Options Appraisal examined a number of generic treatment options for residual waste,” he said. “The appraisal method required that assumptions were made regarding the location of facilities in both the one-site and the two-site options.

“The assumptions allowed for a fair comparison of the options to be made. It should be considered as indicative only, for the purposes of the options appraisal, and bears no relation to any specific site plan or proposal.”

The final decision on the type and location of the waste plant lies with Mercia Waste, which declined to comment at this stage.

The results contained in the consultation document seem to favour an energy from waste-style plant – an incinerator which burns rubbish to create useful heat energy and electricity.

The facility would deal with the county’s growing mountain of non-recycleable household rubbish, most of which is currently being buried underground and comes at a great financial cost.

The council’s last efforts to build an incinerator were thrown out in 2002 after mass public protests from people living near a proposed site in Kidderminster.

To get a copy of the consultation document and make your views known, visit the county council’s waste management strategy webpages or e-mail [wastestrategy@worcestershire.gov.uk](mailto:wastestrategy@worcestershire.gov.uk).

- To read the consultation document in full, click [here](#).

Relevant comments

CJH says...

10:02am Fri 17 Apr 09

As the Morganite Crucible factory at Norton is now closed surely it would be logical to put it there, next to the recycling plant. Local residents can hardly complain about change of use, as for decades they had kilns operating 24 hours a day anyway. Pity they knocked down the chimney! And having lit the fuse I shall retire to a safe distance while the residents of Norton explode...

[Report this post »](#)      [Register/Log In »](#)

Chris Morag says...

12:42pm Fri 17 Apr 09

Since when did logic have anything to do it! We already have a landfill site where all wastes went with a spanking new expensive bypass which is apparently no longer part of the equation for waste disposal because it is not next to the M5. The site is to be reclaimed and that is what should be happening at the pocket where Morganites was located. Incinerator facilities often need to be near water and close to the power grid so these are your starters for 10. I was advised recently by Worcestershire County Council that all inquiries should be made of the operator concerned so presumably Severn Waste as party to the PFI contract in the county should be providing the answers. Alternatively try Mr Prodger who recently took a beano in Spain at the expense of BIFFA.

#### **( Mercia )**

So the County Council has not learnt its lesson from the Kidderminster crushing in 2002. If recycling is done properly and a Biomass digester used then there will be no available energy left from the residue. There are good council examples around the country. Come on Worcs, stop wasting our money and get real independent advice.

Wyre Forest Friends of the Earth

[Report this post »](#)      [Register/Log In »](#)

peetajon says...

10:04pm Fri 17 Apr 09

So, the county council have wasted £millions on a waste sorting plant and now they want to waste £millions more on an incinerator. Overall, a waste to energy plant is still a net user of energy - it does NOT give us free electricity. What it does give us for free is pollution in the form of dioxins which harm our health and carbon dioxide which harms our environment. There are better ways to reduce, recycle and re-use our waste that do not slowly poison us all. Peetajon



The seven options that have been assessed have used a combination of one and two site options. All options with one site are assumed to go to Site A, which is close to Worcester City on the M5 corridor. The two site option includes two sites that are assumed to be located at Hartlebury and Madley.

All waste has been assumed to go via two routes:

- Kerbside 240L wheeled bins, and
- Civic Amenity sites (large - with compaction)

Waste is then transported from these points either to a transfer station, or direct to one of the proposed facilities.

All waste from CA sites (or Household Waste Sites, HWS) is assumed to go direct to the proposed facilities. This is as per current practice in which waste is compacted on each site, and therefore has no need to go via transfer stations for bulking.

Waste from kerbside collections goes either via transfer stations to the proposed facilities, or direct to the proposed facilities. The table below provides a basic view of the flows of waste from each local authority.

**Table 2.1****Waste Flow - 1 Site Options**

Authority		Destination
Worcester City		site A
Bromsgrove DC	Transfer	site A
Malvern Hills DC	Transfer 10%	site A 90%
Redditch BC	Transfer	site A
Wychavon DC		site A
Wyre Forest DC		site A
Hereford Council	Transfer	site A

Depending on whether the option has one or two proposed sites, there are differences in the waste flows.

**SC13-1645**

Alan Ridley, Planning Inspectorate,  
4/02 Kite Wing,  
Temple Quay House,  
2, The Square,  
Temple Quay,  
Bristol BS1 6PN

14<sup>th</sup> December 2011

Dear Mr Ridley,

**Hartlebury Incinerator**

I would like to draw your attention to what I believe has been a serious failing on the part of Herefordshire Council in looking for the best possible option in dealing with the waste from the county.

Starting 2 - 3 years ago, proposals were developed to build a community owned anaerobic digester in or near Leominster (LeAD), to take local waste and produce renewable energy and heat. Feasibility studies were carried out with funding obtained through Sharenergy, into the most appropriate technology, and into planning, permits needed etc.

Feedstock sources were considered, farm waste, food processing and cider making waste, food waste from homes, schools, hospitals, pubs and restaurants, supermarkets etc. My colleague, Philippa Roberts, a member of the Chartered Institute of Waste Management, researched the feedstock options and was blocked by Herefordshire Council who refused to discuss the possibility of waste collected by the Council being available for the Leominster AD project.

She spoke to officers Kenton Vigus and Richard Wood, and Cllr. John Jarvis, cabinet member for waste at the time, and was told categorically that food waste collections would not be considered because of the incinerator. We have so far been unable to take this project forward, in part at least because of the intransigence of Herefordshire



Council, which seems to be at odds with the government's support for AD, and with some aspects of the Localism Bill.

Herefordshire Council have failed to look at all the options for reducing and dealing with waste from the county, and this should be taken into account when making a decision about the incinerator.

Yours sincerely,

Felicity Norman

Cllr. Felicity Norman  
Member for Leominster North  
Tel. 01568 780886  
E. [fnorman@herefordshire.gov.uk](mailto:fnorman@herefordshire.gov.uk)

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Table 9 – Assessment category weightings

Assessment category	Weighting
Planning risk	3
Landfill diversion	4
Waste composition flexibility	3
Waste tonnage flexibility	3
End product liability	3
Transport	4

#### 4.4 Assumptions

##### 4.4.1 WRATE model

###### 4.4.1.1 Model year

The WRATE model has been developed based on the modelled year 2014. The waste arisings have therefore been based on the arisings for the year 2014/15.

###### 4.4.1.2 Waste tonnage and composition

The composition of municipal solid waste (MSW) has been taken from the Authorities' assessment. Whereas the composition of commercial and industrial (C&I) waste is based on the composition provided within the EA's composition assessment conducted for Yorkshire and the Humber 1998/99.

The tonnage of waste arising modelled is the combination of the expected MSW arisings from the waste collection authorities involved and the quantity of C&I waste required to fill the residual capacity of the proposed Mercia EnviRecover facility (200,000 tpa). These figures are displayed in Table 10 below:

Table 10 – WRATE waste arising

WCA	Arisings (tpa)
Wyne Forest	26,121
Bromsgrove	20,361
Redditch	17,734
Wycham north	13,803
Wycham south	16,646
Worcester City	20,198
Malvern Hills	15,285
Hereford South (Leominster)	12,389
Hereford North (Rotherwas)	28,383
<b>Total MSW</b>	<b>170,920</b>
C&I	29,080
<b>Total</b>	<b>200,000</b>



## Alternative waste management options using AD

The Anaerobic Digestion and Biogas Association (ADBA)

It is our belief that promoting incineration of food waste goes against the principles of the waste hierarchy and the position outlined in the Government's Waste Review (June 2011). If local authorities are to make the most economically and environmentally effective use of their waste streams, other waste treatment process should be employed, and for food waste that means anaerobic digestion. In the context of the Government's binding targets on carbon emissions and renewable energy, it is imperative that waste and recycling policy plays a central role in fighting climate change and building a more sustainable economy. As waste is a limited resource, it is also vital to make the most of it.

Defra's Review of Waste Policy (June 2011) identified that half of food waste generated – over 8 million tonnes – comes from households and hence is in the control of local authorities. It also stated unequivocally that “of the main options for the treatment of food waste, anaerobic digestion offers the greatest environmental benefit”. Local Authorities therefore have a leading role to play in leading the Government's commitment to realise a “huge increase” in energy from waste through anaerobic digestion, while getting the greatest environmental benefit from their waste at the same time. There are already 74 AD plants in the UK, approximately 45 of which utilise food waste as a feedstock, illustrating the viability of the industry.

A significant part of the environmental benefit of treating waste through AD rather than incineration comes from the digestate which is produced at the end of the process. This is a nutrient rich biofertiliser, which can replace carbon intensive artificial fertilisers on farmland. Recycling nutrients such as phosphorus, which are found in food waste, will increase in importance over the coming years: it is a finite resource, with world production expected to peak in the 2030s. It is therefore critical to future food production that we do not waste these nutrients.

Creating quality biofertilisers under existing British standards, and proposed European end of waste standards, requires source segregation of food waste. By removing the organic fraction and prioritising it for AD, contamination of the other recyclable materials will be drastically reduced meaning an improvement in the quality of recyclable materials as well as a boost for the AD sector. They also reduce the volume of food waste produced, reducing the cost of collection and treatment and ultimately helping council tax payers.

Alongside failing to make the best use of resources, incineration projects also can reduce the recycling rates in local authorities. As WRAP have noted ([Domestic Mixed Plastics Packaging Waste Management Options](#)), there is currently a ‘Catch 22’ situation, with few councils prepared to collect plastic waste other than bottles, as there is limited potential for them to be recycled. However, this means there is a lack of such plastics available for companies to attempt to do so.

Bearing in mind the objectives outlined in the Waste Review and more broadly Britain's long term environmental goals, incineration should not be considered for the vast majority of waste streams, particularly including the organic fraction. Incineration destroys critical nutrients which should be recycled back to land to ‘close the loop’ of food production. With the potential to create 35,000 jobs and provide over 10% of the UK's domestic gas demand

by 2020, the potential for the AD industry to make the most of this resource and contribute to UK plc is also enormous.

In this light we would urge you to closely consider the true environmental and economic impacts of this proposal, and whether, given the long term targets that must be met by Government, you are pursuing the correct policy.

MAP SHOWING 74 AD PLANTS IN THE UK  
NNFCC/WRAP plant map (<http://biogas-info.co.uk/maps/index2.htm#>).

Comparing the CO<sub>2</sub> emissions of AD plants and incinerators generating electricity provides illuminating data (FoE report)

CO <sub>2</sub> emissions resulting from electricity generation (gCO <sub>2</sub> /kWh) –	
Current grid	500
2030 target	50
Current incinerator	540
New incinerator	305
AD plant	11

On energy production, the best estimate is that one tonne of waste generates 84m<sup>3</sup> CH<sub>4</sub>.

In terms of cost, estimations are that a municipal AD plant which treats 70,000 – 300,000 tonnes/annum will cost approximately £30 million. A good example to look at is Biffa's Cannock site, which opened in 2011 and cost £24 million and treats 120,00 tpa C&I food waste - it is capable of generating 6000 kWe  
(<http://www.letsrecycle.com/news/latest-news/compost/biffa-opens-uk2019s-largest-ad-plant>).

See below for a brief summary of the incentives available for electricity and heat production.

### Electricity:

1. **Feed-in-Tariff** – for small scale AD plants under 5MW (note that support levels are currently under review and highest banding level proposed to be reduced from October 2012)

≤ 250 kW = 14.7p/kWh

≤ 500kW = 13.7p/kWh

>500-≤5000 kW = 9.9p/kWh

2. **Renewable Obligation Certificates** – for large scale AD plants above 5MW (there are plans to degress this support until 2017 when the RO will be replaced with FiT CfD for new applicants)

2 ROCs/MWh  $\cong$  9.0p/kWh

**Heat:**

**Renewable Heat Incentive** – for biomethane and biogas combustion up to 200kWth limit (note that both this limit and the tariff level itself will be reviewed in the next 4 months)  
7.1p/kWth

On gate fees see WRAP's annual report from 2011 for comprehensive information on gate fees

(<http://www.wrap.org.uk/sites/files/wrap/Gate%20Fees%20Report%202011.pdf>).

On energy production, the best estimate is that one tonne of waste generates 84m<sup>3</sup> CH<sub>4</sub>.



20 May 2012

**SC14-717**

Our ref: 50567



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

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire CW1 6GJ

T 0300 060 3900

**BY EMAIL ONLY**

Dear Nicholas

**Proposed Changes to the Worcestershire Waste Core Strategy DPD following the Examination**

1. Thank you for your consultation dated 5 April 2012, which we received on the same date.
2. 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.
3. We have studied the various documents referred to in your consultation. We have no objection to the proposed changes to the Worcestershire Waste Core Strategy and no additional observations to offer in light of the National Planning Policy Framework.
4. We are content with the findings of the updated Habitats Regulations Assessment Screening Decision (April 2012). Indeed, we welcome the fact that the recommendations put forward in the Statement of Common Ground between English Heritage, Natural England and the Council (February 2012) are reflected in the changes. We believe these will bring greater clarity to the plan.
5. We note that the review of Sustainability of the Proposed Changes (March 2012) makes a number of recommendations for mitigating the adverse environmental effects of the Waste Core Strategy changes or for maximising opportunities for benefits. If it is possible to take these into account at this stage we encourage the Council to do so.
6. We confirm that we do wish to be notified of the publication of the Inspector's report and his recommendations, and any subsequent adoption of the document.
7. For any queries relating to this consultation only you are welcome to contact me directly - telephone: 0300 060 2010 or email: [david.westbrook@naturalengland.org.uk](mailto:david.westbrook@naturalengland.org.uk). For all other consultations and correspondence, please contact the above address.

Yours sincerely

A grey rectangular box representing a redacted signature.

David Westbrook  
Land Use Operations

**SC15-716**

**From:** SMITH, Amanda [mailto:Amanda.Smith@english-heritage.org.uk]  
**Sent:** 21 May 2012 16:23  
**To:** WCS (PEP)  
**Subject:** Proposed Changes Worcestershire Waste Core Strategy

Dear Mr Dean

Thank you for your emails of 5 April and 25 April inviting comments on the proposed changes to the Waste Core Strategy Development Plan Document (DPD).

We welcome the consideration and inclusion of the proposed changes PC 42, PC 54, PC 56 and PC 129 which address our previous representations and accord with the Statement of Common Ground prepared by English Heritage, Natural England and Worcestershire County Council.

I confirm that English Heritage has no further comments at this stage.

Yours sincerely

Amanda Smith | Planner (West Midlands)  
Direct Line: 0121 6256851  
Mobile: 07771 937379  
Fax: 0121 6256821  
English Heritage | The Axis | 10 Holliday Street | Birmingham | B1 1TG

[www.english-heritage.org.uk](http://www.english-heritage.org.uk)



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Nicholas Dean,  
Minerals and Waste Team Leader,  
Planning, Economy, and Performance,  
County Hall,  
Spetchley Road,  
Worcester.  
WR2 2NP.

Mr P. Townley, (1674)

[REDACTED],  
Hartlebury,  
Kidderminster,  
Worcestershire.  
[REDACTED].

Tel: [REDACTED]

Email: [REDACTED]

**Your ref: SP8010. 12**

21<sup>st</sup> May 2012.

**Re: Comments on the Waste Core Strategy DPD and Proposed Changes:**

Dear Sir/Madam

**The opening section** - talks about the WCS being a 'long term vision for Worcestershire'. This implies that the document ignores or excludes the implications of disposal of waste on behalf of Herefordshire (Unitary) County Council.

**Fundamental principles**- I would suggest that the overarching principal aims of the Strategy should be the reduction of climate changing gases, however caused, and that all waste is dealt with as far up the waste hierarchy as is possible. It should be made very explicit, in the thinking behind every section, that it is these principles that 'drive' the Strategy.

**Geographical Hierarchy and centres of waste production** – there appears to be no account taken of the waste generated by Hereford and disposed of by WCC. This would alter the 'centre of gravity' towards the south and west of Worcestershire, away from the north east. This would be nearer to Worcester itself and the two M5 junctions. Hereford's contribution is only mentioned, and then only 'in passing', when the waste arisings are detailed. This would have implications for the transportation of such waste – carbon footprint, cost, social and environmental effects.

**The Hereford contribution of waste** - this is a not insignificant 24% of the total MSW arisings. This proportion of the total is likely to carry across to the other categories of waste also eg: C&I waste etc. There is little support in the WCS to promote community responsibility for waste in Herefordshire, which would affect the implications mentioned in the previous point.

**Comment on Technological neutrality** – this is an admirable aim if flexibility is to be maintained in response to change. However the document later talks of a thermal process dealing with 150t capacity and with a stack height of 80m – **this does not sound very neutral at all!**

**Waste Arisings** – The model used to estimate the change to MSW over the life of the Strategy over-estimates the increase by some margin. My calculation, using the basis from the JMWMS, shows an initial reduction from 383,446t in 2010, to a low point in 2015, then a steady increase to 416,292t by 2020 and 428,442t by 2030. These are somewhat lower than those given in the WCS. This would have implications for calculations of capacity gaps, and proposals for future planning of waste facilities. **Continued on page 2 . . .**



## **Re: Comments on the Waste Core Strategy DPD and proposed changes: continued . . .**

**Comment on CHP vs EfW – with regard to the principles I stated at the outset**, I strongly suggest that CHP is separated from 'EfW' or plant producing only 'heat or energy'. This would then take more account of the EU 'CHP' Directive, and the Defra 'Research Note' response to it. This would also have the effect of producing an 'efficiency/preference' hierarchy.

CHP facilities have efficiencies far greater than those for 'Heat only' or 'Power only', for example:

- CHP efficiency typically 80%, with a 30% reduction of CO<sup>2</sup> emissions.
- Conventional EfW - Power only – 35% to 40% efficient.

The Swedish experience of CHP – 3.8million tonnes of MSW is converted to 340GW/heat and 80GW/electricity annually through CHP facilities.

It is worth noting that in conventional fossil fuelled power plant, 33% of the heat is converted to power, with 67% of the heat lost to the atmosphere. A conventional coal –fired power station is about 38% efficient. An output of 15MW of electricity would require about 38,250 tonnes of coal ( eg: Ratcliffe on Soar), whereas the planned EfW Hartlebury plant would need 200,000 tonnes of MSW to do produce the same amount of electrical energy. ie: 5 times the amount of 'fuel'.

**To promote flexibility and sustainability** - other technologies such as MBT/Autoclaving, possibly combined with AD, would allow energy conversion on or off site using much more efficient conversion processes. Alternatively RDF could be produced to displace other fuels elsewhere – see the 'Cemex' scheme for turning MSW into RDF, in Rugby.

Any 'solution' wasting 60+% heat to the atmosphere should be a non-starter!

Any 'solution' that has a fixed capacity will not provide the sort of flexible response needed in a strategy to cover such a period envisaged by the WCS.

## **As a restatement of what I see as the Core principles . . .**

**WO1 – reduction of greenhouse gases.** This has implications for any technological process chosen for dealing with waste. This affects the geographical location of facilities, and the effects on transportation, infrastructure, environment and the implications of 'waste miles'.

**WO3 – driving up the waste hierarchy.** The intention should be to '**maximize**' this process in every case, reducing to an absolute minimum the amount of waste to be disposed of.

**'Optimizing' is a compromise** – the question has to be - for whom are the benefits of optimization? The strongest incentives are needed to promote the achievement of these Objectives.

**The only 'minimizing'** should be to the negative effects that waste management can have on the community and the environment.

Yours sincerely

Mr. P. Townley.

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

## **Consultation on the Proposed Changes to the WCS DPD**

### **Response Form**

---

The Worcestershire Waste Core Strategy Development Plan Document was submitted to the Secretary of State on 28th November 2011. The Secretary of State appointed Andrew S. Freeman to undertake an independent examination into the soundness of the Waste Core Strategy. As part of the examination, hearing sessions were held from 13th to 16th March to discuss the principal matters identified by the Inspector.

In response to the Inspector's questions and debate in the hearing sessions, the Council would like to propose a number of changes to the Waste Core Strategy. These changes have been the subject of further Sustainability Appraisal and updated Habitats Regulations Assessment Screening Decision.

This is your opportunity to comment on the proposed changes.

---

The consultation will run from **5th April 2012 to 5.30pm on Monday 21st May 2012**

This form has two parts:

Part A: Your Contact Details: It is not possible for representations to be considered anonymously

Part B: Your representation(s): A separate page for each representation you wish to make.

---

#### **NOTES ON ONLINE SUBMISSION**

The online form can not be saved for future completion, please ensure that you have all the relevant information available before commencing the online form. If you wish to keep a printed record of your submission you are advised to print each page of your online form as you fill it in by using the print option of your internet browser.

Please note that up to 10 separate representations can be included in one online submission. The text box to give details about your representation is limited to 10,000 characters. If this is not sufficient you will need to:

- Make an additional online submission, or
- Submit your representation on paper or by email to Nick Dean at [wcs@worcestershire.gov.uk](mailto:wcs@worcestershire.gov.uk) or Minerals and Waste Planning, PEP, County Hall, Spetchley Road, Worcester, WR5 2NP

#### **Part A: Your Contact 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 website.

Where there are groups who share a common view on the proposed changes, 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.

Fields marked \* must be completed.

**Title:**

Mr

**First Name(s)**

Clive

**Surname \***

Narrainen

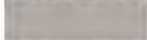
**Organisation (where relevant)**

**Job Title (where relevant)**

**Address: \***

 Merstham Redhill

**Postcode: \***



**Telephone Number:**

**Email Address:**

---

**Number of people represented by group (where applicable)**

## Details of authorisation of representation (where applicable)

### Part B: Your Representation (1)

---

Your representation should cover all the evidence and supporting information necessary to support/justify the representation and any suggested changes.

**To which of the proposed changes or part of the Sustainability Appraisal or Habitats Regulations Assessment Screening Decision does this representation relate?**

*If you wish to make representations on more than one aspect there will be an opportunity to add more representations on completion of this page*

Proposed change reference: PC20

Sustainability Appraisal section:  
Habitats Regulations Assessment  
Screening Decision:

**Do you consider that the Worcestershire Waste Core Strategy incorporating the proposed main and additional modifications is legally compliant and sound?**

	Yes	No
Legally compliant?	<input checked="" type="radio"/>	<input type="radio"/>
Sound?	<input checked="" type="radio"/>	<input type="radio"/>

---

**If your representation relates to the SOUNDNESS of the Waste Core Strategy please answer the two questions below:**

**If you consider that the Worcestershire Waste Core Strategy incorporating the proposed main and additional modifications is not sound please specify why?**

Please select **ALL** that apply

- ☐ It is not justified
- ☐ It is not effective
- ☐ It is not consistent with national policy

**Please give details of why you consider that the Worcestershire Waste Core Strategy incorporating the proposed main and additional modifications is not sound?**

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

---

**If your representation relates to the LEGAL COMPLIANCE of the Waste Core Strategy please answer the question below:**

**Please give details of why you consider that the Worcestershire Waste Core Strategy incorporating the proposed main and additional modifications is not legally compliant?**

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

---

**Do you wish to make an additional representation about another aspect of the Waste Core Strategy?**

- ☒ Yes  
☐ No

## **Part B: Your Representation (2)**

---

Your representation should cover all the evidence and supporting information necessary to support/justify the representation and any suggested changes.

**To which of the proposed changes or part of the Sustainability Appraisal or Habitats Regulations Assessment Screening Decision does this representation relate?**

*If you wish to make representations on more than one aspect there will be an opportunity to add more representations on completion of this page*

Proposed change reference: PC40

Sustainability Appraisal section:  
Habitats Regulations Assessment  
Screening Decision:

**Do you consider that the Worcestershire Waste Core Strategy incorporating the proposed main and additional modifications is legally compliant and sound?**

	Yes	No
Legally compliant?	<input checked="" type="radio"/>	<input type="radio"/>
Sound?	<input checked="" type="radio"/>	<input type="radio"/>

---

**If your representation relates to the SOUNDNESS of the Waste Core Strategy please answer the two questions below:**

**If you consider that the Worcestershire Waste Core Strategy incorporating the proposed main and additional modifications is not sound please specify why?**

Please select **ALL** that apply

- ☐ It is not justified
- ☐ It is not effective
- ☐ It is not consistent with national policy

**Please give details of why you consider that the Worcestershire Waste Core Strategy incorporating the proposed main and additional modifications is not sound?**

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

---

**If your representation relates to the LEGAL COMPLIANCE of the Waste Core Strategy please answer the question below:**

**Please give details of why you consider that the Worcestershire Waste Core Strategy incorporating the proposed main and additional modifications is not legally compliant?**

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

---

**Do you wish to make an additional representation about another aspect of the Waste Core Strategy?**

- ☒ Yes  
☐ No

## **Part B: Your Representation (3)**

---

Your representation should cover all the evidence and supporting information necessary to support/justify the representation and any suggested changes.

**To which of the proposed changes or part of the Sustainability Appraisal or Habitats Regulations Assessment Screening Decision does this representation relate?**

*If you wish to make representations on more than one aspect there will be an opportunity to add more representations on completion of this page*

Proposed change reference: PC140

Sustainability Appraisal section:  
Habitats Regulations Assessment  
Screening Decision:

**Do you consider that the Worcestershire Waste Core Strategy incorporating the proposed main and additional modifications is legally compliant and sound?**

	Yes	No
Legally compliant?	<input checked="" type="radio"/>	<input type="radio"/>
Sound?	<input checked="" type="radio"/>	<input type="radio"/>

---

**If your representation relates to the SOUNDNESS of the Waste Core Strategy please answer the two questions below:**



**If you consider that the Worcestershire Waste Core Strategy incorporating the proposed main and additional modifications is not sound please specify why?**

Please select **ALL** that apply

- ☐ It is not justified
- ☐ It is not effective
- ☐ It is not consistent with national policy

**Please give details of why you consider that the Worcestershire Waste Core Strategy incorporating the proposed main and additional modifications is not sound?**

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

---

**If your representation relates to the LEGAL COMPLIANCE of the Waste Core Strategy please answer the question below:**

**Please give details of why you consider that the Worcestershire Waste Core Strategy incorporating the proposed main and additional modifications is not legally compliant?**

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

**Do you wish to make an additional representation about another aspect of the Waste Core Strategy?**

- ☐ Yes  
☒ No

## Part B: Your Representation (4)

---

Your representation should cover all the evidence and supporting information necessary to support/justify the representation and any suggested changes.

**To which of the proposed changes or part of the Sustainability Appraisal or Habitats Regulations Assessment Screening Decision does this representation relate?**

*If you wish to make representations on more than one aspect there will be an opportunity to add more representations on completion of this page*

Proposed change reference:

Sustainability Appraisal section:

Habitats Regulations Assessment

Screening Decision:

**Do you consider that the Worcestershire Waste Core Strategy incorporating the proposed main and additional modifications is legally compliant and sound?**

	Yes	No
Legally compliant?	<input type="radio"/>	<input type="radio"/>
Sound?	<input type="radio"/>	<input type="radio"/>

---

**If your representation relates to the SOUNDNESS of the Waste Core Strategy please answer the two questions below:**

**If you consider that the Worcestershire Waste Core Strategy incorporating the proposed main and additional modifications is not sound please specify why?**

Please select **ALL** that apply

- ☐ It is not justified  
☐ It is not effective  
☐ It is not consistent with national policy

**Please give details of why you consider that the Worcestershire Waste Core Strategy incorporating the proposed main and additional modifications is not sound?**

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

---

**If your representation relates to the LEGAL COMPLIANCE of the Waste Core Strategy please answer the question below:**

**Please give details of why you consider that the Worcestershire Waste Core Strategy incorporating the proposed main and additional modifications is not legally compliant?**

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

---

**Do you wish to make an additional representation about another aspect of the Waste Core Strategy?**

- ☐ Yes
- ☐ No

## **Part B: Your Representation (5)**

---

Your representation should cover all the evidence and supporting information necessary to support/justify the representation and any suggested changes.

**To which of the proposed changes or part of the Sustainability Appraisal or Habitats Regulations Assessment Screening Decision does this representation relate?**

*If you wish to make representations on more than one aspect there will be an opportunity to add more representations on completion of this page*

Proposed change reference:

Sustainability Appraisal section:

Habitats Regulations Assessment

Screening Decision:

**Do you consider that the Worcestershire Waste Core Strategy incorporating the proposed main and additional modifications is legally compliant and sound?**

	Yes	No
Legally compliant?	<input type="radio"/>	<input type="radio"/>
Sound?	<input type="radio"/>	<input type="radio"/>

---

**If your representation relates to the SOUNDNESS of the Waste Core Strategy please answer the two questions below:**

**If you consider that the Worcestershire Waste Core Strategy incorporating the proposed main and additional modifications is not sound please specify why?**

Please select **ALL** that apply

- ☐ It is not justified
- ☐ It is not effective
- ☐ It is not consistent with national policy

**Please give details of why you consider that the Worcestershire Waste Core Strategy incorporating the proposed main and additional modifications is not sound?**

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

---

**If your representation relates to the LEGAL COMPLIANCE of the Waste Core Strategy please answer the question below:**

**Please give details of why you consider that the Worcestershire Waste Core Strategy incorporating the proposed main and additional modifications is not legally compliant?**

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

---

**Do you wish to make an additional representation about another aspect of the Waste Core Strategy?**

- ☐ Yes  
☐ No

## **Part B: Your Representation (6)**

---

Your representation should cover all the evidence and supporting information necessary to support/justify the representation and any suggested changes.

**To which of the proposed changes or part of the Sustainability Appraisal or Habitats Regulations Assessment Screening Decision does this representation relate?**

*If you wish to make representations on more than one aspect there will be an opportunity to add more representations on completion of this page*

Proposed change reference:

Sustainability Appraisal section:

Habitats Regulations Assessment

Screening Decision:

**Do you consider that the Worcestershire Waste Core Strategy incorporating the proposed main and additional modifications is legally compliant and sound?**

	Yes	No
Legally compliant?	<input type="radio"/>	<input type="radio"/>
Sound?	<input type="radio"/>	<input type="radio"/>

---

**If your representation relates to the SOUNDNESS of the Waste Core Strategy please answer the two questions below:**



**If you consider that the Worcestershire Waste Core Strategy incorporating the proposed main and additional modifications is not sound please specify why?**

Please select **ALL** that apply

- ☐ It is not justified
- ☐ It is not effective
- ☐ It is not consistent with national policy

**Please give details of why you consider that the Worcestershire Waste Core Strategy incorporating the proposed main and additional modifications is not sound?**

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

---

**If your representation relates to the LEGAL COMPLIANCE of the Waste Core Strategy please answer the question below:**

**Please give details of why you consider that the Worcestershire Waste Core Strategy incorporating the proposed main and additional modifications is not legally compliant?**

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

**Do you wish to make an additional representation about another aspect of the Waste Core Strategy?**

- ☐ Yes  
☐ No

## Part B: Your Representation (7)

---

Your representation should cover all the evidence and supporting information necessary to support/justify the representation and any suggested changes.

**To which of the proposed changes or part of the Sustainability Appraisal or Habitats Regulations Assessment Screening Decision does this representation relate?**

*If you wish to make representations on more than one aspect there will be an opportunity to add more representations on completion of this page*

Proposed change reference:

Sustainability Appraisal section:

Habitats Regulations Assessment

Screening Decision:

**Do you consider that the Worcestershire Waste Core Strategy incorporating the proposed main and additional modifications is legally compliant and sound?**

	Yes	No
Legally compliant?	<input type="radio"/>	<input type="radio"/>
Sound?	<input type="radio"/>	<input type="radio"/>

---

**If your representation relates to the SOUNDNESS of the Waste Core Strategy please answer the two questions below:**

**If you consider that the Worcestershire Waste Core Strategy incorporating the proposed main and additional modifications is not sound please specify why?**

Please select **ALL** that apply

- ☐ It is not justified  
☐ It is not effective  
☐ It is not consistent with national policy

**Please give details of why you consider that the Worcestershire Waste Core Strategy incorporating the proposed main and additional modifications is not sound?**

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

---

**If your representation relates to the LEGAL COMPLIANCE of the Waste Core Strategy please answer the question below:**

**Please give details of why you consider that the Worcestershire Waste Core Strategy incorporating the proposed main and additional modifications is not legally compliant?**

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

---

**Do you wish to make an additional representation about another aspect of the Waste Core Strategy?**

- ☐ Yes
- ☐ No

## **Part B: Your Representation (8)**

---

Your representation should cover all the evidence and supporting information necessary to support/justify the representation and any suggested changes.

**To which of the proposed changes or part of the Sustainability Appraisal or Habitats Regulations Assessment Screening Decision does this representation relate?**

*If you wish to make representations on more than one aspect there will be an opportunity to add more representations on completion of this page*

Proposed change reference:

Sustainability Appraisal section:

Habitats Regulations Assessment

Screening Decision:

**Do you consider that the Worcestershire Waste Core Strategy incorporating the proposed main and additional modifications is legally compliant and sound?**

	Yes	No
Legally compliant?	<input type="radio"/>	<input type="radio"/>
Sound?	<input type="radio"/>	<input type="radio"/>

---

**If your representation relates to the SOUNDNESS of the Waste Core Strategy please answer the two questions below:**

**If you consider that the Worcestershire Waste Core Strategy incorporating the proposed main and additional modifications is not sound please specify why?**

Please select **ALL** that apply

- ☐ It is not justified
- ☐ It is not effective
- ☐ It is not consistent with national policy

**Please give details of why you consider that the Worcestershire Waste Core Strategy incorporating the proposed main and additional modifications is not sound?**

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

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**If your representation relates to the LEGAL COMPLIANCE of the Waste Core Strategy please answer the question below:**

**Please give details of why you consider that the Worcestershire Waste Core Strategy incorporating the proposed main and additional modifications is not legally compliant?**

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

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**Do you wish to make an additional representation about another aspect of the Waste Core Strategy?**

- ☐ Yes  
☐ No

## **Part B: Your Representation (9)**

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Your representation should cover all the evidence and supporting information necessary to support/justify the representation and any suggested changes.

**To which of the proposed changes or part of the Sustainability Appraisal or Habitats Regulations Assessment Screening Decision does this representation relate?**

*If you wish to make representations on more than one aspect there will be an opportunity to add more representations on completion of this page*

Proposed change reference:

Sustainability Appraisal section:

Habitats Regulations Assessment

Screening Decision:

**Do you consider that the Worcestershire Waste Core Strategy incorporating the proposed main and additional modifications is legally compliant and sound?**

	Yes	No
Legally compliant?	<input type="radio"/>	<input type="radio"/>
Sound	<input type="radio"/>	<input type="radio"/>

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**If your representation relates to the SOUNDNESS of the Waste Core Strategy please answer the two questions below:**



**If you consider that the Worcestershire Waste Core Strategy incorporating the proposed main and additional modifications is not sound please specify why?**

Please select **ALL** that apply

- ☐ It is not justified
- ☐ It is not effective
- ☐ It is not consistent with national policy

**Please give details of why you consider that the Worcestershire Waste Core Strategy incorporating the proposed main and additional modifications is not sound?**

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

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**If your representation relates to the LEGAL COMPLIANCE of the Waste Core Strategy please answer the question below:**

**Please give details of why you consider that the Worcestershire Waste Core Strategy incorporating the proposed main and additional modifications is not legally compliant?**

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

**Do you wish to make an additional representation about another aspect of the Waste Core Strategy?**

- ☐ Yes  
☐ No

## Part B: Your Representation (10)

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Your representation should cover all the evidence and supporting information necessary to support/justify the representation and any suggested changes.

**To which of the proposed changes or part of the Sustainability Appraisal or Habitats Regulations Assessment Screening Decision does this representation relate?**

*If you wish to make representations on more than one aspect there will be an opportunity to add more representations on completion of this page*

Proposed change reference:

Sustainability Appraisal section:

Habitats Regulations Assessment

Screening Decision:

**Do you consider that the Worcestershire Waste Core Strategy incorporating the proposed main and additional modifications is legally compliant and sound?**

	Yes	No
Legally compliant?	<input type="radio"/>	<input type="radio"/>
Sound?	<input type="radio"/>	<input type="radio"/>

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**If your representation relates to the SOUNDNESS of the Waste Core Strategy please answer the two questions below:**

**If you consider that the Worcestershire Waste Core Strategy incorporating the proposed main and additional modifications is not sound please specify why?**

Please select **ALL** that apply

- ☐ It is not justified  
☐ It is not effective  
☐ It is not consistent with national policy

**Please give details of why you consider that the Worcestershire Waste Core Strategy incorporating the proposed main and additional modifications is not sound?**

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

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**If your representation relates to the LEGAL COMPLIANCE of the Waste Core Strategy please answer the question below:**

**Please give details of why you consider that the Worcestershire Waste Core Strategy incorporating the proposed main and additional modifications is not legally compliant?**

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

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**Do you wish to be notified of the publication of the Inspector's Report and his recommendations and any subsequent adoption of the document?**

- ☒ Yes  
☐ No

Thank you for completing this questionnaire. Please click the **SUBMIT** button below.