

Waste Core Strategy Emerging Preferred Options

Consultation Response Document

May 2010

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Introduction

The Council is preparing a "Waste Core Strategy: a plan for how to manage all the waste produced in Worcestershire up to 2027. In November 2009, the Council consulted on the "Emerging Preferred Options Consultation". This report sets out in detail the issues we need to address, how we intend to do so and the alternatives we have considered. The consultation period ran from 16th November 2009 to 4th February 2010. Later responses were also accepted.

A letter and information sheet was sent to approximately 490 organisations and individuals, with a letter questionnaire and summary document being sent to a further 715 stakeholders by post and approximately 140 email contacts (some of which might also have been contacted by post). Full documents were sent to 13 partner organisations. All of those contacted were informed of the consultation and invited to respond. The documents and questionnaire were also made available on the council's website and at hubs and libraries.

To publicise the consultation articles were placed in the free Word on Worcestershire resident's magazine and the Worcestershire Partnership Newsletter, media releases were issued and public notices were placed in free newspapers. Libraries, hubs and waste operators were also sent posters with a request that they display these on their premises.

We received 51 hard copies of the questionnaire (reference prefix PR), 30 online responses (reference prefix OQ) and 39 representations made by letter or email (reference prefix NQ). This gave an overall response rate of 10.03%.

Details of the comments received between 16th November 2009 and 9th February 2010 are set out below, along with an initial Officer's response. Any further comments received have also been considered but have not been included in this document due to the timescales associated with analysing the responses.

Summary of responses received

Numerous responses related to the data used and questioned the accuracy of figures and projections. It was pointed out that data is rarely up to date and is often flawed.

This problem is recognised at all levels, including government. Defra is currently trying to improve the accuracy of data. We will use the best information available. We acknowledge the weaknesses in available data on C&I waste and set out the limitations in details in the *Waste Arisings Background Document: Summary of Waste Arisings and Estimates of Waste Growth to 2027*. We will however endeavour to develop the WCS based on the best available data and will continually keep our evidence base under review.

Projections were also not felt to reflect the current economic situation, with it being anticipated that lower incomes and greater economic pressures on business will result in waste reductions.

The strategy will apply until at least 2027 and must therefore take into account long term as well as immediate economic pressures. The WCS will be regularly monitored and reviewed. In line with regional and national policy, we are consciously pursuing ambitious targets as a worst-case scenario. We do not think that market forces will support an over-provision of facilities.

In general consultees expressed the view that Climate Change was an important consideration in the plan and that in some cases this needed to be strengthened to remove any contradictions

We agreed with this statement and will consider it when developing the Waste Core Strategy.

Alternative forms of transport were not felt to be fully considered in the Emerging Preferred Options Paper.

The Council is preparing background documents on *Inland Waterways* and *Waste Freight by Rail*. The WCS will be updated to include a more comprehensive consideration of these issues.

Anaerobic Digestion was a popular treatment technology, and recycling was heavily supported.

Whilst the Waste Core Strategy will promote movement of waste up the waste hierarchy (Reduce-Reuse-Recycle and only to landfill as a last resort), it will be as flexible as possible in order to cope with technological change and does not favour any specific technology type.

The policies will be strengthened to make the reference to the waste hierarchy more explicit and embed it as a guiding principle for the Waste Core Strategy.

There was general agreement with the Spatial Hierarchy however it was suggested that alterations should be made to the positions of Redditch, Tenbury and Bewdley due to their functions in the sub-region. In addition it was suggested that the approach should be flexible enough to deal with waste arisings elsewhere or from specialist facilities.

The Strategy will be revised accordingly, to reflect the hierarchy of settlements in the RSS and the pattern of arisings and opportunities for waste related development in the county.

Cross boundary movements of waste were considered to undermine the strategy and in particular objectives WO5 "To make communities in Worcestershire take responsibility for their own waste" and WO6 "To reduce the transport of waste by road where possible". There was particular concern regarding the joint management of waste from Herefordshire and Worcestershire. Although some support was voiced for the way in which cross-boundary movements were considered, several comments suggested that this consideration should be expanded.

We agree that waste should be managed as close as possible to the source of their arisings. We do, however, have to recognise that there are economies of scale for some facilities.

The Waste Core Strategy will recognise the need for cross-boundary co-operation, however it is inevitable that economies of scale mean that some wastes will be imported and exported into and out of the county. The strategy will seek to minimise this and will be based upon achieving equivalent self-sufficiency in waste management capacity.

The management of Municipal Waste is undertaken in partnership between Worcestershire County Council, Herefordshire Council and all District Councils in Worcestershire. Their approach is set out in the Joint Municipal Waste Management Strategy. The reviewed Joint Municipal Waste Management Strategy does not specify where the major waste treatment facility/ies should be located. It does however require that some facilities for the treatment of MSW are/will be located in Herefordshire e.g. composting and bulking plant.

The WCS will be updated to make the consideration of cross boundary movements more explicit, demonstrating these graphically. The spatial implications on the joint waste management contract with Herefordshire will be considered in more detail.

There was some confusion between the Waste Core Strategy and Joint Municipal Waste Management Strategy.

The council has two distinct responsibilities, as a waste disposal authority (relating to the Joint Municipal Waste Management Strategy) and as a waste planning authority (relating

to the Waste Core Strategy), covered by different statutory regulations and policy requirements. The two elements are conducted quite separately.

The reviewed Joint Municipal Waste Management Strategy deals with how municipal waste should be managed. The Waste Core Strategy must set the policy framework by which all waste management facility developments must be assessed, including those brought forward from the reviewed Joint Municipal Waste Management Strategy. The Waste Core Strategy will replace the existing policy framework (Structure Plan and relevant district Local Plan policies) but these will continue to be used to assess applications until the Waste Core Strategy is adopted.

Efforts were made to explain this distinction in all consultation documents and on our website. We will continue to make the distinction as clear as possible in the future.

Many responses received made reference to a proposed incinerator at Hartlebury. In relation to this the following concerns were raised:

- 1) The application may be determined before the Waste Core Strategy is adopted and as such the community would not have to opportunity to have a say;**
- 2) Incineration may have impacts on pollution and health in the area;**
- 3) Anaerobic digestion would be preferable to incineration but has not been given adequate consideration;**

The Waste Core Strategy is not technology specific. It does not include any commitment to incineration nor does it identify sites at this stage. At the time of the consultation a proposal for an energy from waste plant at Hartlebury was at a pre-application stage. This proposal was being developed by Mercia Waste Management. The Council has a contract with Mercia to deal with Municipal Waste and this is likely to be the cause of the confusion. However the council has two distinct responsibilities, as a waste disposal authority and as a waste planning authority, covered by different statutory regulations and policy requirements. The two elements are conducted quite separately.

- 1) Any application for planning permission will be determined on its merits, judged on the basis of the Development Plan. When completed the Waste Core Strategy will form part of the Local Development Framework. This will be used alongside District and Borough Core Strategies (which will replace the old 'local plan' and 'structure plan' policies) to provide the planning policies against which applications for waste management will be judged. However until the Waste Core Strategy is adopted the existing policy framework will be used to assess applications, including national and regional policy, saved policies in the Structure Plan and the relevant Local Plan. A previous application by Mercia Waste for an incinerator (at Kidderminster) was refused planning permission by the council. Other proposals which do not comply with the development plan will similarly be refused.

All applications will be advertised and consulted upon in accordance with the council's Statement of Community Involvement, which is intended to enable local people and statutory and non-statutory consultees to express their views.

- 2) The Environment Agency is responsible for advising the council on the pollution implications of waste management proposals and will be consulted on both the

emerging Waste Core Strategy and any Planning Applications. Defra's advice is that there is no credible evidence of adverse health outcomes for those living near incinerators (Waste Strategy 2007, p77).

All applications with potentially significant environmental impacts will be required to include an Environmental Impact Assessment. The Environment Agency and, if appropriate, the Health and Safety Executive, Health Protection Agency and Primary Care Trust will be consulted on any such application.

- 3) The advantages and limitations of Anaerobic Digestion and thermal treatment have been considered in the background document *Recovering Energy from Waste*, available on our website www.worcestershire.gov.uk/wcs.

Comments were made by some that the consultation was not detailed enough, and by others that the consultation was too complex.

The issues are necessarily complex, but due to the size of the document some information was not included. Instead it was available alongside it in the background documents, particularly the *Waste Arisings* document, available on our website.

In the preparing the submission document, efforts will be made to make sure the content is as clear and as readable as possible, without over simplifying what are often complex issues.

Other issues were mentioned that are outside of the remit of the WCS, including improving the collection of commercial and industrial waste and initiatives to reduce waste arisings from these sources.

We have informed the Council's waste management and economic staff about these concerns and they will consider them accordingly.

Detailed responses to the questions

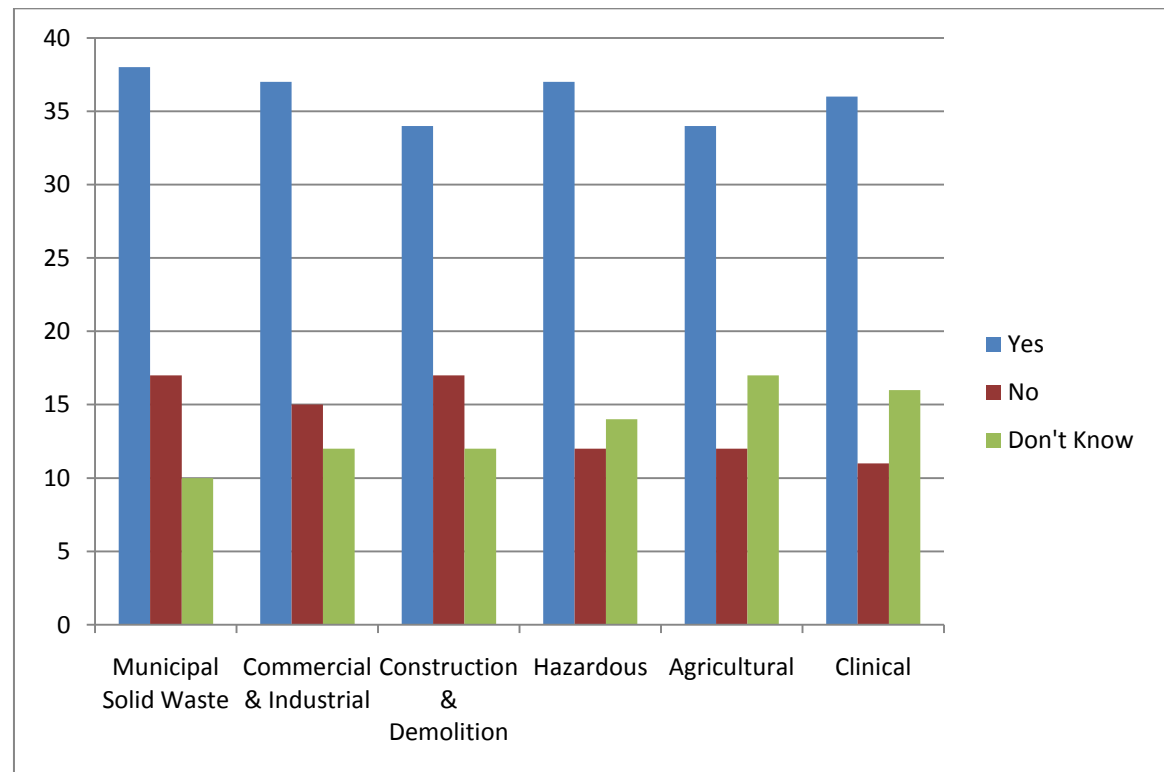
Question 1

Do you agree that these Arisings and Projections are a sound estimate of how much waste we need to manage over the life of the Strategy and that we should develop Preferred Options on this basis?

Table 1: Question 1 responses

	Yes	No	Don't Know
Municipal Solid Waste	38	17	10
Commercial & Industrial	37	15	12
Construction & Demolition	34	17	12
Hazardous	37	12	14
Agricultural	34	12	17
Clinical	36	11	16

Base: all valid responses received before 9th February 2010.



Reference	Name/Organisation	Summary of comments	Initial officer response
Municipal Solid Waste			
PR16-1216	Mr Philpott, <i>Salford Priors Parish Council</i>	We note an inconsistency between table 1 on p14 and the table of Kg per household on p43 - the former shows an increase in waste production, the latter a substantial reduction.	Table 1 assumes a growth in households in Worcestershire inline with RSS proposed housing numbers. Page 43 refers to levels of waste per household. The assumptions behind any tables will be made clear in the Waste Core Strategy.
PR16-1216	Mr Philpott, <i>Salford Priors Parish Council</i>	<p>The Parish Council recognises that plans for the management of MSW are better developed because the County Council has more direct control than in the case of commercial and industrial waste and other types of waste. The Parish Council believes that all treatment and disposal options including mechanical and biological treatment and energy from waste options should be considered.</p> <p>We note that sites within industrial estates have been identified as potential locations for waste plants and we support this proposal. The major issue with such locations is not usually the nature of the process or any emission since these can now be well controlled. However, there is often an issue as to whether or not transport routes to the plant are adequate and this may affect the possible input to the plant.</p>	<p>Agreed. All options will be considered. Background documents, including <i>Types of Facilities</i>, consider the implications of different treatment and disposal options.</p> <p>Transport issues will be explicitly considered in drawing up the detailed options.</p>
PR52-1679	Martin Pollard/Nick Roberts, <i>Axis on Behalf of Mercia Waste Management (MWM)</i>	Whilst the MSW figures presented within the Core Strategy Emerging Preferred Options (EPO) document do not precisely accord with Mercia Waste Managements (MWMs) own projections, the Company understand the basis upon which	Noted.

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>they have been prepared and supports it.</p> <p>With regard to the calculation of MSW arising and projections contained within Appendix 5 of the EPO document, MWM believe that it is sensible that the predictions are reviewed following the formal response from the Secretary of State on the housing projections within the RSS.</p> <p>The Company sees the merit with the Councils proposed approach that it would be more beneficial to predict a slightly higher level of growth in municipal waste arisings, as it avoids potential under provision of waste management capacity in the future.</p>	<p>Agreed. We endeavour to develop the WCS based on the best available data and will continually keep our evidence base under review.</p> <p>Noted.</p>
Commercial and Industrial Waste			
PR16-1216	Mr Philpott, <i>Salford Priors Parish Council</i>	We believe efforts have been made to access available information but continual monitoring and review will be necessary throughout the plan period. We are concerned that in some areas, particularly C&I waste, information appears to be limited and out of date.	Agreed. We acknowledge the weaknesses in available data on C&I waste and set out the limitations in details in the <i>Waste Arisings Background Document: Summary of Waste Arisings and Estimates of Waste Growth to 2027</i> . We will however endeavour to develop the WCS based on the best available data and will continually keep our evidence base under review.
PR16-1216	Mr Philpott, <i>Salford Priors Parish Council</i>	Commercial and Industrial Waste - The parish council recognises that the County Council has less control over this type of waste. However it is a matter of concern that it represents such a large proportion of the whole and the strategy appears somewhat light in terms of providing for its	Agreed in principle but this would be subject to commercial agreement.

Reference	Name/Organisation	Summary of comments	Initial officer response
		treatment and disposal. In particular the quantities of C&I waste proposed to be diverted from landfill are incredibly challenging. We would question whether provision should be made for treating significant quantities of C&I waste within facilities for dealing with MSW.	
PR52-1679	Martin Pollard/Nick Roberts, <i>Axis on Behalf of Mercia Waste Management (MWM)</i>	MWM support the C&I projections and has no further comments to make with regard to the other waste streams.	Noted.
Construction and Demolition Waste			
PR6-330	David Doley, <i>Banbury Windows Ltd</i>	Disagree: Vast quantities of subsoil arisings appear to 'be moved' with little regard to the possible use they could be put to with regard to the close proximity principle.	Noted. There is very little data on the movement of soil and subsoil arisings at present. We anticipate that reviews of the strategy will be able to address this matter more fully.
NQ9-817	Frank Hill, <i>Campaign to Protect Rural England</i>	Predicted Waste Arisings: We question whether the trend in Construction and Demolition arisings will be downward, as shown in the graph, bearing in mind the need to construct thousands of houses between 2016 to 2026 as a result of the RSS?	Predictions are based on WMRA data, see the <i>Waste Arisings</i> background document.
PR16-1216	Mr Philpott, <i>Salford Priors Parish Council</i>	Construction waste - predicting the future quantity of construction waste is particularly difficult. The Parish Council would expect to see this waste either recycled for immediate local use or used for the restoration of old mineral workings. The imposition of greater controls on landfill has led to concern that many old mineral sites will never be restored.	Agreed. The strategy will contain a policy requiring development proposals to consider how construction and demolition waste will be managed. The Strategy will also give specific consideration to the use of landfill in the restoration of old mineral workings.

Reference	Name/Organisation	Summary of comments	Initial officer response
Agricultural Waste			
PR38-Anon	Anonymous	Why should agricultural waste be managed by Council. Farmers seem to be able to disperse it on their land.	It is national policy to plan for the controlled waste element of this material. Non-Directive waste can usually be dealt with on farm. Please see the <i>Agricultural Waste</i> background document.
Clinical Waste			
NQ34-232	Peter Male, <i>Worcestershire Acute Hospital NHS Trust</i>	I can confirm that the Trust is supportive of the policy aims and direction outlined in the document including the broad areas for waste management facilities and proposed policy areas in the strategy. I am also in agreement with your proposed assumption that clinical waste arisings will increase at the same rate as the population.	Support for approach noted.
General Comments on question 1			
PR16-1216	Mr Philpott, <i>Salford Priors Parish Council</i>	Future quantities of waste: the Parish Council commends the work involved in trying to estimate future waste quantities and considers that best efforts have been made across the full range of waste types. These estimates will require continual updating as further data becomes available. Also, it is known that certain areas of waste production are very dependent on prevailing economic conditions.	Agreed. We will endeavour to develop the WCS based on the best available data and will continually keep our evidence base under review.
PR19-674	Mrs Williams, <i>Wick Parish Council</i>	Agree - Providing that the figures used as the basis of these calculations are correct.	Support for approach noted. Full details are set out in <i>Waste Arisings Background Document: Summary of Waste Arisings and Estimates of Waste Growth to 2027</i> .
PR21-695	David Ingleby, <i>Gloucestershire County Council</i>	Data on MSW is likely to be very robust. C&I, C&D and other is not generally as easy to collate. But in saying this we have no reason to suggest	Agreed. We will endeavour to develop the WCS based on the best available data and will continually keep our evidence base under

Reference	Name/Organisation	Summary of comments	Initial officer response
		that they are inaccurate.	review.
PR24-1645	Mrs L Brookes	<p>The figures are presented in a complex manner and are only predictions. Waste going to landfill is falling dramatically.</p> <p>Why are we taking Waste from Herefordshire, it's a big county even if more sparsely populated.</p>	<p>The projections are based on best available data and will be reviewed.</p> <p>The reviewed Joint Municipal Waste Management Strategy proposes joint-working and provision. All 8 councils in the two counties are in the process of considering this at present.</p>
PR25-681 PR48-1622 PR49-1623	<p>Ivor Pumfrey, <i>Malvern Hills District Council</i> & Lindsay Wood, <i>Worcester City Council</i> Andrew Ford, <i>Wychavon District Council</i> (all make identical comments on this matter)</p>	<p>We are very pleased to note MSW growth Scenario 3 developed for the first revision JMWMS has been adopted for the WCS and strongly support this approach as it aligns these two key related strategies.</p> <p>Agree reasoning for approach proposed for other streams except clinical waste as proposed increase at same rate as population does not make clear if demographic changes have been adjusted for as rising older population may increase quantities of clinical waste.</p>	<p>Support for the approach noted.</p> <p>To date we have not found any evidence to quantify changes in waste arisings due to demographic change. Consultation with the Worcestershire Acute Hospitals NHS Trust shows agreement with the current approach and the WCC Background Document <i>Waste Arising from Healthcare Related Activities</i> demonstrates that current capacity far exceeds the projections made. Therefore we propose to continue to develop the WCS based on the current projections, unless evidence suggests that an alternative approach is more appropriate.</p>
PR25-681	Ivor Pumfrey, <i>Malvern Hills District Council</i> &	We strongly support the provision of sufficient waste transfer capacity for wider reasons than	Agreed.

Reference	Name/Organisation	Summary of comments	Initial officer response
PR48-1622 PR49-1623	Lindsay Wood, <i>Worcester City Council</i> Andrew Ford, <i>Wychavon District Council</i> (all make identical comments on this matter)	simply the import and export of waste materials (p.17). The efficiency and cost of provision of future municipal waste management services will depend directly upon future transfer facilities.	
PR26-1653 PR30-1649	Mr A and Mrs H Jones Mr and Mrs C Jones	I disagree with the figures as I feel they are based on current predictions/worst case scenarios and not based on recycling initiatives.	The strategy will be based on the best predictions of waste arisings available, all of which are in accordance with national policy, and we will develop appropriate methods of managing them.
PR28-1651	Mr P Spalton	I think that you have underestimated the impact of legislation on packaging and financial penalties for industry waste from central government. Commerce and Industry should be forced to recycle more.	Commercial and Industrial waste figures are based on national policy which takes account of these initiatives. Agreed.
PR29-1650	Mr S Tranter	As you stated your own figures are flawed, they are based up to 2007. This was during a rapid expansion in supposed wealth over the past 20-30 years. People spent more and wasted more. We are currently entering a time of austerity. People have got to learn to exist on less, giving less waste. The likes of Lawrence's forge recycling are at 80% and want to recycle 95% of their waste. Their capacity 250,000 tpa they want to work within the	Agreed, but we wish to ensure that sufficient capacity will be provided. The assessments will be monitored and reviewed over the course of the life of the strategy. Noted.

Reference	Name/Organisation	Summary of comments	Initial officer response
		European Waste Directive (C&I and C&D)	
PR31-Anon	Anonymous	How do you expect us to agree to sound estimates when waste managements are rarely up to date and has flaws in all levels of Government?	This problem is recognised at all levels, including government. Defra is currently trying to improve the accuracy of data. We will use the best information available.
PR32-1648	Mrs G Sanderson	We are better educated since 2007 regarding recycling - less waste today - youngsters more geared up than we were.	Agreed.
PR37-1656-1656	Mr C Rogers	Nearly all materials can be recycled or should be. Press for all products to be made from recyclable materials and increase awareness and provide recycling facilities.	Agreed. The council is pursuing this through the reviewed Joint Municipal Waste Management Strategy.
PR43-639	Dr I Fertin, <i>Far Forest Councillor</i>	The estimations are not clear. The target seems too high taking in to account that are few facilities for recycling and collection.	In line with regional and national policy, we are consciously pursuing ambitious targets.
PR46-1685	M R Jones	Landfill Capacity: Report is 3 years old.	Noted. Defra is currently trying to improve the accuracy of data. We will use the best information available.
PR48-1622	Lindsay Wood, <i>Worcester City Council</i>	Query – any imported from Gloucestershire/ Southwest?	Some material is imported from Gloucestershire and the Southwest but the data is very poor at present. Defra is currently trying to improve the accuracy of data. We will use the best information available. We intend to show this graphically in developing the submission document.
PR48-1622	Lindsay Wood, <i>Worcester City Council</i>	p.6 In first paragraph, there is capitalisation of e.g. Retail etc, not sure if this is necessary.	Noted, we will amend as necessary.
OQ3-830	Mr P Robinson	It is difficult for me as a member of the public to make any comment on these estimates as I am	Noted. Please see the background documents, particularly the <i>Waste Arisings</i>

Reference	Name/Organisation	Summary of comments	Initial officer response
		not able to see from the full paper, what basis you have made these on.	document, available on our website www.worcestershire.gov.uk/wcs .
OQ4-601	T.C. Ward, <i>Kempsey Parish Council</i>	It is not clear why the arisings from construction and demolition should fall during a period of significant housing/infrastructure development as proposed by the SWJCS	Predictions are based on WMRA data, see the <i>Waste Arisings</i> background document.
OQ6-1666	Mrs E Morgan	I do not believe the figures used as I have not been given enough information to know if they are correct and I consider that the council has probably under-estimated in order to give themselves an easy target to achieve.	The issues are necessarily complex, but due to the size of the document some information was not included. Instead it was available alongside it in the background documents, particularly the <i>Waste Arisings</i> document, available on our website www.worcestershire.gov.uk/wcs . Lower estimates exist but we have chosen not to develop policy based upon them. In line with regional and national policy, we are consciously pursuing ambitious targets.
OQ7-1444	Peter Morgan	This is a stupid question because the general public do not have all the information you have to be able to look at and assess whether these figures are broadly correct. A great deal will depend on how the county develops in the future. You have used percentages for C & I without providing any basis of how achievable they are. Also, you do not seem to be making provision for	The issues are necessarily complex, but due to the size of the document some information was not included. Instead it was available alongside it in the background documents, particularly the <i>Waste Arisings</i> document, available on our website www.worcestershire.gov.uk/wcs . In line with regional and national policy, we are consciously pursuing ambitious targets. The strategy will be regularly monitored and reviewed. We have no knowledge of any proposed

Reference	Name/Organisation	Summary of comments	Initial officer response
		the waste being imported from Herefordshire - the intended incinerator at Martley and the MRF at Norton will import masses of waste from outside the county - it seems the same may happen for non-domestic waste also.	incinerator at Martley. We will make provision for the capacity required by the reviewed Joint Municipal Waste Management Strategy. In accordance with the Panel recommendations on the Phase Two revision of the West Midlands Regional Spatial Strategy we will base policy on the principle of 'equivalent self-sufficiency' but taking into account cross-boundary movements of waste, some of which will be for the export of Worcestershire's waste out of county.
OQ15-1668	N and K Dowty	Think that recycling/ composting levels need to be significantly higher. Black bin waste needs to be sorted prior to landfill.	Promotion of recycling of black-bin waste is dealt with by the reviewed Joint Municipal Waste Management Strategy.
OQ16-626	<i>Norton-juxta-Kempsey Parish Council</i>	The very large increase in commercial and industrial waste is very concerning and we wonder if more could be done to control this.	Agreed, but this is not directly within the control of the council.
OQ17-1669	Mr A Pulley	Figures projected during economic growth (2007) and as far as I can see are not adjusted for the massive recession we are in.	The strategy will apply until at least 2027 and will be regularly monitored and reviewed. In line with regional and national policy, we are consciously pursuing ambitious targets.
OQ19-1671	Mr R Archard	There is ample evidence that countrywide there is a steady annual DECREASE in MSW arisings and C&I waste is expected to fall as companies become more cost conscious and government initiatives take effect. As an incinerator is proposed the assumptions must also include the fly ash which will	The strategy will apply until at least 2027 and will be regularly monitored and reviewed. In line with regional and national policy, we are consciously pursuing ambitious targets. Commercial and Industrial waste figures are based on national policy which takes account of these initiatives. The strategy does not propose an incinerator. Agreed that some ash from incinerators can

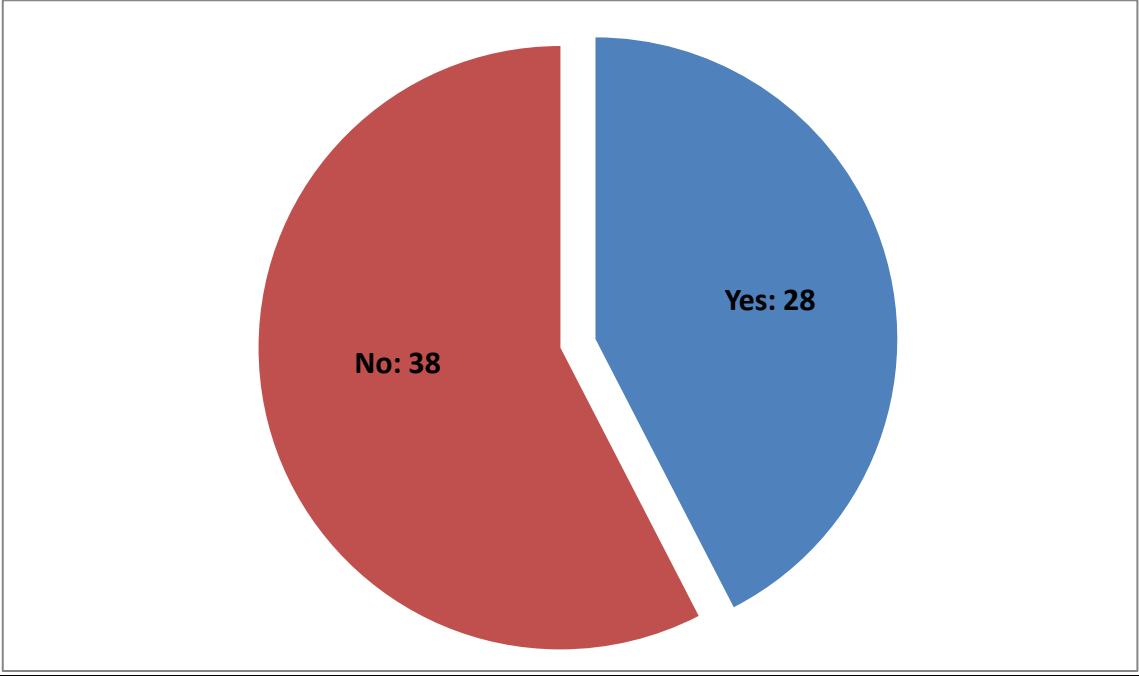
Reference	Name/Organisation	Summary of comments	Initial officer response
		undoubtedly be classed as hazardous.	be classed as hazardous.
OQ20-1672	Mrs M and Mr L Philips	Without an independent assessment/report in PLAIN ENGLISH these figures are too subjective.	The methodologies are set out in the background documents which are available on our website www.worcestershire.gov.uk/wcs . The purpose of this, and other, consultations is to assess their appropriateness.
OQ22-108	Steve Bloomfield <i>Worcestershire Wildlife Trust</i>	We consider that the County is best placed to determine the relevant figures and assume that this process has been carried out robustly.	Support noted.
OQ23-1673	Tony Jauncey	All these waste management and green issues are changing these figures as they evolve. IT IS IMPOSSIBLE to use today's figures which are based on previous experience and not taking into account the changes that are coming about. IT IS LIKE USING THE PAST FEW YEARS ECONOMIC CLIMATE WHEN THERE IS A HUGE CHANGE AFOOT.	The strategy will apply until at least 2027 and will be regularly monitored and reviewed. In line with regional and national policy, we are consciously pursuing ambitious targets.
OQ24-1674	Mr P Townley	2008-9 MSW figure shows a further reduction. New households will have a reducing increase year on year because of national targets being met. 'Green waste' effect is overstated - low take up of 'bought' service and some of this waste is the same waste that would enter the stream by another route (HRSs). I estimate this figure at 441,297 tonnes by 2034.	The estimates for MSW are based on the introduction of further services and the collection of a wider range of waste, and have already been subject to consultation on the proposed reviewed Joint Municipal Waste Management Strategy.
OQ28-696	Deborah Klein, <i>Herefordshire Council</i>	We have no reason to question the figures, and agree in principle. The fact that Herefordshire is included in the MSW figures (only), needs to be clearly stated and differentiated from the other figures.	Agreed. Agreed.

Reference	Name/Organisation	Summary of comments	Initial officer response
		On C&D waste, possible changes to the weighting in the RSS need to be taken account of through built-in flexibility.	
OQ30-1684	seskco3 (email address)	Hazardous waste is not sufficiently defined.	Please see the <i>Hazardous Waste</i> background document, available on our website at www.worcestershire.gov.uk/wcs .

Question 2

Do you think we should develop Preferred Options on the basis that we should provide for the following additional waste management capacity to be made available in the County?

New thermal treatment facility/facilities to treat up to 250,000tpa of MSW by 2034



Reference	Name/Organisation	Summary of comments	Initial officer response
Thermal Treatment			
PR10-1649	Mr P Vernon	MSW (residual) must be segregated and/or sorted. The waste quantity of organic material can be treated by anaerobic digestion with energy recovery via biogas. Incineration is not the way of the future see the Stockholm convention.	Noted. Anaerobic digestion with energy recovery is considered in the background document <i>Resource Recovery from Biodegradable Waste</i> . The evidence base will be updated to take the Stockholm convention into account.
NQ16-719	Hilary Berry, <i>Environment Agency</i>	<p>The WCS rightly considers the need to deal with thermal treatment residues: “We will however consider alternatives to make it possible to reduce the volumes actually landfilled” (page 20). We suggest that this statement should be re-worded as follows: “We will however encourage and support alternatives...”</p> <p>See http://www.edie.net/news/news_story.asp?id=5700 and the EA report: “Solid Residues from Municipal Waste Incinerators in England and Wales” for potential uses for incinerator bottom ash as a construction material.</p> <p>Treatment options (page 20 chapter 6) : The consultation seems to suggest that only a single option will be chosen from list A-G. The National Waste Strategy 2007 advocates the need for “the right facilities, in the right place and at the right time”. Therefore a range of options should be selected. From our perspective, Options B, C and F would appear to be the more sustainable solutions.</p>	<p>Agreed. This will be reflected in the Strategy.</p> <p>Options A-G are taken from the reviewed Joint Municipal Waste Management Strategy, which has undergone consultation and is currently being considered by all the councils in Herefordshire and Worcestershire. Until the decision is made we intend to develop options which could address any of these.</p>
PR21-695	David Ingleby, <i>Gloucestershire</i>	(Agreed) Thermal or other residual treatment facilities.	Noted.

Reference	Name/Organisation	Summary of comments	Initial officer response
	<i>County Council</i>		
PR23-1643	Mr P Miles	<p>At best the environmental implications of incineration are questionable. Investing in one massive incinerator will tie up tax payers money in an outdated form of waste management. Worcestershire County Council should be looking to maintain a flexible policy that can cope with technological improvements in the future.</p> <p>Additionally transporting so much waste to one site will leave a massive carbon footprint!!</p>	<p>The Waste Core Strategy will take into account the implications of all types of waste management facilities. It will be as flexible as possible in order to cope with technological change but it does not favour any specific technology type.</p> <p>We agree that transportation is an important issue and is currently considered in the <i>Climate Change, Inland Waterways and Waste Freight by Rail</i> background documents which will be available on our website www.worcestershire.gov.uk/wcs.</p>
PR26-1653	Mr A and Mrs H Jones	<p>I have ticked 'no' to waste being incinerated as burning waste is at odds with the need to recycle - the mentality will be why sort out waste to recycle when you can simply burn it. More should be done to encourage recycling.</p> <p>ALSO the health effects need to be considered - European Commission and numerous respected bodies have identified health risks.</p>	<p>Noted.</p> <p>The Environment Agency is responsible for advising the council on the pollution implications of waste management proposals and will be consulted on both the emerging strategy and any specific proposals. Defra's advice is that there is no credible evidence of adverse health outcomes for those living near incinerators (Waste Strategy 2007, p77).</p>
PR27-	Mr TJ Harrop	The assumption that energy from waste	Defra's advice is that this is not the case

Reference	Name/Organisation	Summary of comments	Initial officer response
1652		<p>(incineration) will be required and will provide a satisfactory solution is erroneous. It deters rather than encourages recycling.</p> <p>The very process of incineration has a potential to produce pollutants the true extent of which are not totally known.</p> <p>It would seem that the projection of 250,000 tonnes of residual waste to go to incineration is excessive. Annex D indicates that 85% is recyclable. More than 100,000 tonnes will be organic material suitable for treatment by alternative means. To create a facility for incineration of 250,000 tonnes locks the authority into ensuring the quantity is available for the life the plant. it provides no incentive for increasing the level of recycling nor does it generate a requirement to seek more acceptable means to achieve the production of energy from what is the absolutely true level of residual waste - a much lower figure than 250,000 tonnes.</p>	<p>(Waste Strategy 2007, p78).</p> <p>The Environment Agency is responsible for advising the council on the pollution implications of waste management proposals and will be consulted on both the emerging strategy and any specific proposals.</p> <p>The revised Joint Municipal Waste Management Strategy aims to recycle as much material as possible. It recognises, however, that a significant volume of residual waste will also need treatment. It sets out a number of options which the Waste Core Strategy will enable where appropriate.</p>
PR28-1651	Mr P Spalton	I feel that you have overestimated the amount of thermal treatment at the expense of alternative technologies such as bio-digestables and improved recycling capabilities.	The Waste Core Strategy will be as flexible as possible in order to cope with technological change but it does not favour any specific technology type. These estimates have already been subject to public consultation regarding the reviewed Joint Municipal Waste Management Strategy. The consultation specifically identified the

Reference	Name/Organisation	Summary of comments	Initial officer response
			need for capacity to treat more than 100,000 tonnes of biodegradable waste by composting and anaerobic digestion.
PR29-1650	Mr S Tranter	<p>Mass incineration is a very poor way of dealing with a precious resource, MSW must be segregated, sorted properly; the organic material is better treated by Anaerobic digestion (AD). It gives a higher energy recovery rate as biogas which can be stored or is portable. It is far cleaner process and far safer than incineration which by its nature is far more explosive. Second line scrubbers can fail badly.</p> <p>You just assume that there will be 250,000 tonnes of residual waste and that thermal treatment incineration is the only option. That waste contains 85% + of usable materials.</p>	<p>The Waste Core Strategy is not technology specific and does not include any commitment to incineration. There are limitations to the types of waste which can be managed through AD and the advantages and limitations have been considered in the background document <i>Resource Recovery from Biodegradable Waste</i>, available on our website www.worcestershire.gov.uk/wcs.</p> <p>The evidence for 250,000 tonnes of residual waste is taken from the revised Joint Municipal Waste Management Strategy, which itself has been subject to public consultation.</p>
PR36-1655	Mrs LM Bryan	<p>Thermal treatment is incineration which is not an acceptable form of treatment either environmentally or efficient. A large incinerator would not be sustainable and would involve inefficient use of lorries to transport waste from all areas. Totally inflexible. Would not enhance Worcestershire's countryside.</p>	<p>The Waste Core Strategy is not technology specific. Thermal treatment includes a range of technologies, as set out in the background document <i>Recovering Energy from Waste</i>, available on our website www.worcestershire.gov.uk/wcs. Policies will be developed to take into account environmental and other impacts.</p>
PR41-1658 PR44-1680	Mr Meredith & Mr R Meredith	<p>New thermal treatment facilities are not the answer as industries are providing more and more re-usable/biodegradable packaging, so to burn would be a waste of resources.</p>	<p>The reviewed Joint Municipal Waste Management Strategy identifies the need for a form of residual treatment. We intend to develop options which could address any of the options given.</p>
PR42-1659	Mrs L Meredith	<p>Most of the residual waste which would be burnt</p>	<p>The emerging Waste Core Strategy does not</p>

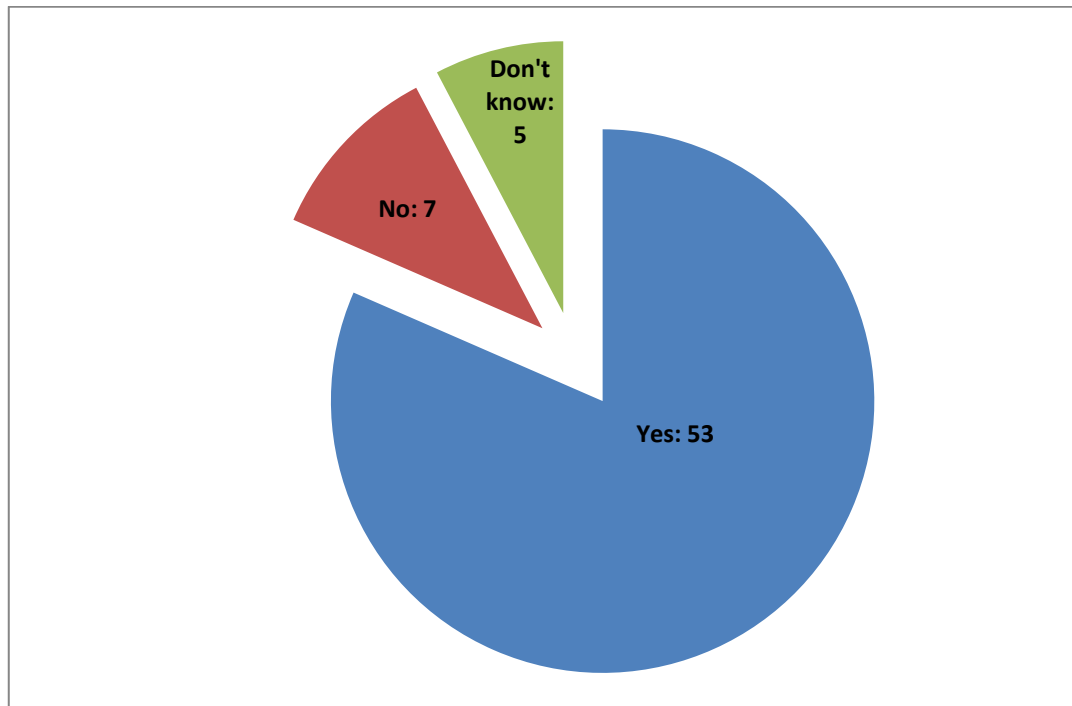
Reference	Name/Organisation	Summary of comments	Initial officer response
		could be resorted and recycled as a large percentage is biodegradable and could be treated by the anaerobic digestion process- a by product of which is biogas - incinerators are not the answer.	include any commitment to incineration. There are limitations to the types of waste which can be managed through AD and the advantages and limitations have been considered in the background document <i>Resource Recovery from Biodegradable Waste</i> , available on our website www.worcestershire.gov.uk/wcs .
PR42-1659	Mrs L Meredith	You claim that there will be 250,000 tonnes of rubbish/residual waste which can only be disposed of by thermal treatment. If sorted properly could be disposed of by anaerobic digestion. Your figures show that 85% of the waste you want to burn is biodegradable or recyclable if sorted properly so why not sort it!	The emerging Waste Core Strategy does not include any commitment to incineration. There are limitations to the types of waste which can be managed through AD and the advantages and limitations have been considered in the background document <i>Resource Recovery from Biodegradable Waste</i> , available on our website www.worcestershire.gov.uk/wcs .
PR45-1661	S Cook	Incineration cannot and must not be an option. The focus should be on waste reduction (eg reduction of food and drink packaging). Incineration will contribute to Greenhouse emissions, is not environmentally friendly whatsoever, and has currently unstudied effects on health and the environment.	The emerging Waste Core Strategy does not include any commitment to incineration. We agree that the focus should be on waste reduction and as such Objective 2 is to do everything possible to minimise waste production. The waste hierarchy will form an over-arching theme of the Waste Core Strategy's policies. The Environment Agency is responsible for advising the council on the pollution implications of waste management proposals and will be consulted on both the emerging strategy and any specific proposals. Defra's advice is that there is no credible evidence of

Reference	Name/Organisation	Summary of comments	Initial officer response
			adverse health outcomes for those living near incinerators (Waste Strategy 2007, p77).
PR52-1679	Martin Pollard/Nick Roberts, <i>Axis on Behalf of Mercia Waste Management (MWM)</i>	<p>MWM supports the recommendations of the JMWMS regarding the facilities required in order to manage municipal waste arising within Worcestershire and Herefordshire, including the management of residual waste through some form of thermal treatment. The Company therefore also supports the preferred option for thermal treatment of residual municipal waste within the Core Strategy EPO.</p> <p>However, whilst MWM does not advocate the Core Strategy being technology specific, it must be explicit that any thermal treatment proposal should incorporate energy recovery.</p> <p>On this point MWM agrees with the listing and description of thermal technologies as set out on Page 11 of the Energy from Waste background paper (Nov 2009). This list is inconsistent with the treatment facilities identified within the JMWMS, as listed on Page 20 of the EPO. The Core Strategy should make it clear that Options D, E & F of the JMWMS list are not themselves thermal treatment facilities. Thus they cannot meet the identified 250,000tpa MSW thermal treatment requirement.</p> <p>With regard to the sizing of the new thermal</p>	<p>Support noted.</p> <p>Agreed. Policies will be developed to ensure that all thermal treatment incorporates energy recovery where practicable.</p> <p>Noted.</p> <p>Noted. Following your comment we are</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>treatment facility / facilities MWM has identified a lower figure than the 250,000tpa identified, albeit on a different design year (2028 as opposed to 2034). Furthermore, we note that the thermal treatment of 250,000tpa of MSW in 2034 would not permit the national or county (JMWMS) strategy targets of 50% MSW recycling and composting to be met.</p> <p>Notwithstanding the above, we consider that the 250,000tpa capacity is of the right order of magnitude.</p>	currently conversing with the council's waste management section to clarify this matter.
OQ2-132	Mr R Reames, <i>E.ON Energy-from-Waste (UK Limited)</i>	It could be more economical to have an "out-of-county" solution by sending waste to a much larger facility than a 250,000 TPA plant.	Noted.
OQ3-830	Mr P Robinson	<p>In short I think you should make as much effort to convert waste into energy, but without dangerous incinerators, which produce dioxins and could accelerate climate change through pollution.</p> <p>More recycling facilities and reuse facilities should be produced across the City.</p>	<p>The Environment Agency is responsible for advising the council on the pollution implications of waste management proposals and will be consulted on both the emerging strategy and any specific proposals.</p> <p>Agreed. The Strategy will make this possible.</p>
OQ9-1626	Mr M Webb, <i>Lower Broadheath Parish Council</i>	Household waste should be regarded as a fuel. Thermal treatment is too vague. This MUST be a waste to power facility. Auto clave solutions are not sensible.	The Waste Core Strategy is not technology specific. We will develop policies to require any proposals for thermal treatment to include energy recovery.
OQ24-1674	Mr P Townley	I broadly favour some sort of thermal treatment but feel strongly that capacity should be split between Herefordshire and North Worcs - "Proximity Principle" eg: near to source, near to M42/M5.	The Waste Core Strategy can only relate to facilities within Worcestershire. The Waste Core Strategy will be as flexible as possible in order to cope with technological change

Reference	Name/Organisation	Summary of comments	Initial officer response
		Priority should be given to production of SynGas or Bio Ethanol or RDF. Facilities should be modular, scaleable - not capacity dependant. 'Spurious precision' - figures reflect trends and assumptions - solutions should be flexible.	but it does not favour any specific technology type.
OQ26-1676	Mr P Holden	As set out in your Recovering Energy from Waste Initial Consultation Document November 2009, Anaerobic Digestion seems to be logical choice not incineration. AD is new technology that does not have the detrimental financial, environmental and visual effects. It is much more efficient in recovering the energy from waste and can mean that even more waste can be recycled, such as certain plastics that are currently unrecyclable. Incineration would seem to be a major backward step on every level. Having looked at the waste proposed for incineration more than 85% could be recycled. Wychavon have been leading the way with food recycling, however burning this waste just so it can be classed as renewable energy does not seem the right approach. The Selby energy recovery example demonstrates what could be done.	The emerging Waste Core Strategy does not include any commitment to incineration. There are limitations to the types of waste which can be managed through AD and the advantages and limitations have been considered in the background document <i>Resource Recovery from Biodegradable Waste</i> , available on our website www.worcestershire.gov.uk/wcs .

New/improved household waste sites at Tenbury and provision for at least 5 sites to be extended or relocated



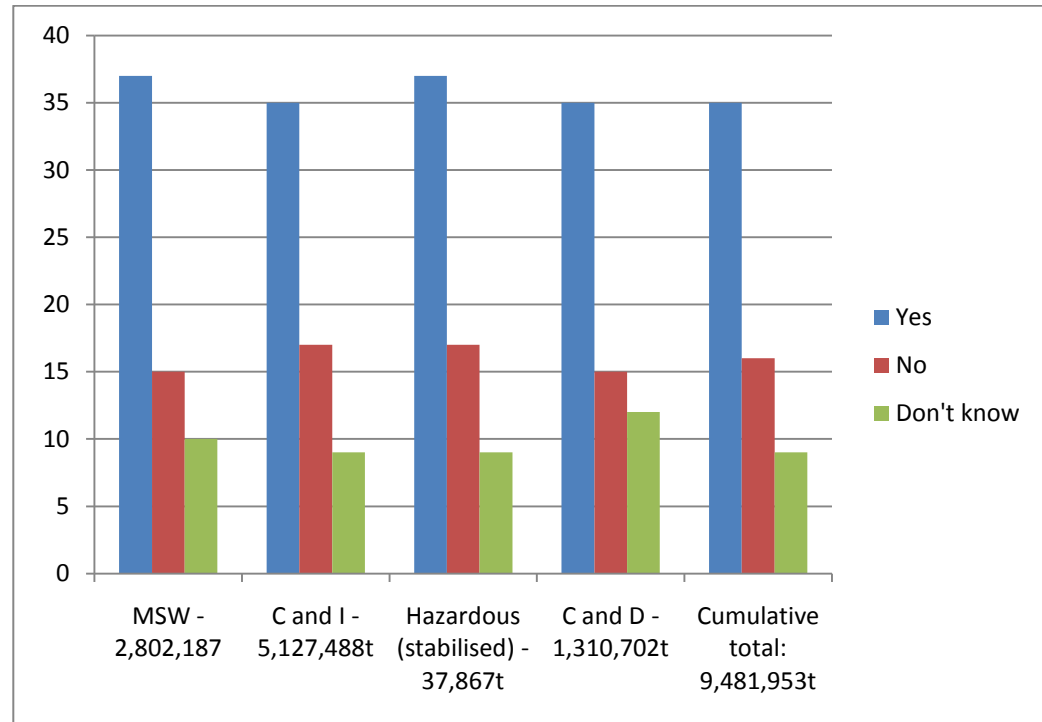
Reference	Name/Organisation	Summary of comments	Initial officer response
Household Waste Sites			
PR25-681	Ivor Pumfrey, <i>Malvern Hills District Council</i>	<p>We are especially pleased to see the need for an improved household waste recycling site for Tenbury Wells being highlighted in the Emerging Preferred Options.</p> <p>There is a pressing need for improvements to be made at other sites including in Malvern and Upton-upon-Severn. The current wording on page 20 does not convey the level of need.</p>	<p>Support noted.</p> <p>Agreed; this is principally a matter for the Joint Municipal Waste Management Strategy. Change to be made to the Waste Core Strategy to recognise the need for improvements or new sites in Malvern, Upton, Bromsgrove, Droitwich, Bromsgrove and west Worcester will be included in and enabled by the Waste Core Strategy.</p>

Landfill Capacity for the following (maximum) cumulative tonnages to be landfilled between 2007 and 2026:

- **Municipal Solid Waste: 2,802,187 tonnes**
- **Commercial and Industrial Waste: 5,127,488 tonnes**
- **Hazardous (stabilised) waste: 37,867 tonnes**
- **Construction and Demolition Waste: 1,310,702 tonnes**
- **Cumulative total: 9,481,953 tonnes**

Please note an error has occurred in this question. The cumulative total should be 9,278,244 tonnes.

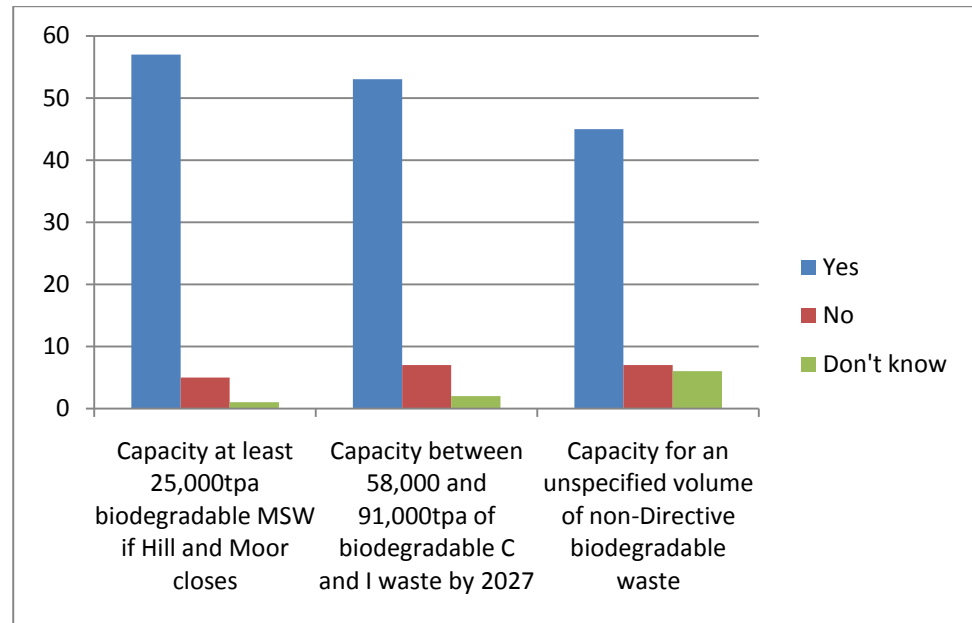
Landfill Capacity	Yes	No	Don't know
MSW - 2,802,187	37	15	10
C and I - 5,127,488t	35	17	9
Hazardous (stabilised) - 37,867t	37	17	9
C and D - 1,310,702t	35	15	12
Cumulative total: 9,481,953t	35	16	9



Reference	Name/Organisation	Summary of comments	Initial officer response
Landfill capacity			
PR8-1063	Mr D Talsma, <i>GKN Corporate Centre</i>	Alternatives to landfill are likely to be significantly more costly. This is a deterrent to redevelopment of buildings and infrastructure.	Advantage West Midlands estimates that, because of increases in the Landfill Tax, almost all forms of waste management will be cheaper than landfill by 2015.
PR25-681 PR49-1623	Ivor Pumfrey, <i>Malvern Hills District Council</i> & Andrew Ford, <i>Wychavon District Council</i>	We strongly support the proposal to monitor actual MSW landfilling to inform the need for further sites being made available. We are concerned that the wording of the current text may leave the identification of future sites too far into the future. The need to avoid any lapse in the continuity of sufficient landfill capacity is essential for future efficient delivery of municipal waste management services.	Noted, monitoring will alert us to possible shortfalls in landfill capacity in good time. We will include estimates of landfill capacity in the monitoring indicators.

New Composting and/or Anaerobic Digestion facilities

New Composting and/or AD facilities	Yes	No	Don't know
with a capacity of at least 25,000tpa biodegradable MSW if the site at Hill and Moor closes	57	5	1
additional facilities to manage between: 58,000 and 91,000tpa of biodegradable C and I waste by 2027	53	7	2
for an unspecified volume of non-Directive biodegradable waste	45	7	6



Reference	Name/Organisation	Summary of comments	Initial officer response
New composting and/or Anaerobic Digestion			
NQ16-719	Hilary Berry <i>Environment Agency</i>	<p>The separate collection of food waste and potential for in-vessel composting or anaerobic digestion of this waste does not appear to have been considered explicitly within the document. The biodegradable portion of MSW that is considered within the WCS appears to consider only green waste and other separately collected biodegradable waste, such as paper and cardboard. Food waste represents a large percentage of MSW - 8.3 million tonnes is thrown away each year in the UK according to the WRAP report: Household Food and Drink Waste in the UK"-</p> <p>http://www.wrap.org.uk/retail/case_studies_research/report_household.html</p> <p>It is vital therefore that the WCS should consider options for how this waste is to be collected and treated – e.g. kerbside collection followed by mechanical biological treatment (MBT), in vessel composting (IV) or anaerobic digestion (AD) or a combination. AD has the advantage of producing biogas that can be used as a source of fuel and could help the county meet its renewable targets. Does Worcestershire’s provision for treating biodegradable waste include food waste or is it simply green waste? This should be clarified.</p> <p>We would encourage the council to continue to</p>	<p>The consideration of potential for composting and AD is based on the background document <i>Recovering Value from Biodegradable Waste</i>.</p> <p>Page 35 of the background document considers food waste from MSW and explains that whilst collection is offered in on district it is unlikely that it will be offered elsewhere. However this is the concern for the JMWMS and WCAs rather than the WCS.</p> <p>Page 36 considers C&I waste arisings including food wastes. It cites a recent survey into food manufacture in the County but states that this had a low response rate. Therefore all projections are based on information presented an AWM report, that 8% of C&I waste is organics. It is not clear from the AWM report whether this includes food waste, but in the WMRA Waste Scenarios study the same term includes green waste and food waste. The Council has therefore assumed that the 8% includes food waste.</p> <p>Agreed.</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
		support initiatives for home composting.	
PR25-681	Ivor Pumfrey, <i>Malvern Hills District Council</i> & Andrew Ford, <i>Wychavon District Council</i>	We strongly support the priority attached to provision of ongoing composting capacity of at least 25,000 tpa in the event that the current facility at Hill and Moor ceases operating. Future options should also take account of prevailing transfer capacity as noted in question 1 above.	Support noted and agreed.
PR29-1650	Mr S Tranter	Organic material is better treated at low temperatures (Bankable biogas) Wychavon started segregation of organic waste on the same model as Ludlow. This should be embraced by all of Herefordshire and Worcestershire and use AD. A modular model should be used using the near proximity rule.	The consideration of potential for composting and AD is based on the background document <i>Recovering Value from Biodegradable Waste</i> . Page 35 of the background document considers food waste from MSW and explains that whilst collection is offered in on district it is unlikely that it will be offered elsewhere. However this is the concern for the reviewed Joint Municipal Waste Management Strategy and Waste Collection Authorities rather than the Waste Core Strategy.
PR31-Anon	Anonymous	The only one I would concede to is AD plants.	Please see comment above. Also please note that the Waste Core Strategy will not be technology specific and will enable AD plants to be developed.
PR32-1648	Mrs G Sanderson	Would prefer modern composting-not incineration.	Noted. The Waste Core Strategy will not be technology specific but the need for additional composting facilities is explicitly recognised.
OQ31-1678	Mr D Desmond	Anaerobic digestion is far better. It gives clean energy from the biogas produced and fertilizer. It is recommended and encouraged by the	The consideration of potential for composting and AD is based on the background document <i>Recovering Value from</i>

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>Government. Food 2030 commends this, and offers financial support to encourage waste authorities to pursue it. The volume left for landfill is half of the volume that an incinerator would produce, and has no ash or pollutants. Selby does it, as does San Francisco (73% reduction without incineration) In contrast, incineration does not destroy toxic elements. The char and fly ash all contain toxic materials which are highly persistent in the case of dioxins. Such incinerators regularly release such pollutants into the air (see Nottingham, Newcastle -on-Tyne, Sheffield, Rotterdam. Incineration is a lot more expensive.</p>	<p><i>Biodegradable Waste</i>. Page 35 of the background document considers food waste from MSW and explains that whilst collection is offered in on district it is unlikely that it will be offered elsewhere. However this is the concern for the reviewed Joint Municipal Waste Management Strategy and Waste Collection Authorities rather than the Waste Core Strategy.</p> <p>The Environment Agency is responsible for advising the council on the pollution implications of waste management proposals and will be consulted on both the emerging strategy and any specific proposals.</p>
OQ28-696	Deborah Klein, <i>Herefordshire Council</i>	<p>The potential for small-scale AD plants and other emerging technology to manage biodegradable waste from a variety of sources could be considered in more detail. The cumulative contribution to waste management and renewable energy/district heating has not been stated. It could also help to start a process of moving away from the tradition 'waste streams' where similar items (e.g. paper, card, glass)from different sources (e.g. households, businesses) are collected and treated separately by different companies. The Welsh Assembly Government is looking seriously at this issue of duplication and European role-models, and is also supporting AD. Neighbouring counties could complement this initiative and help to start a new approach.</p>	<p>We note your comment about district heating and will consider making reference to it in the Waste Core Strategy. Policies will be developed to give consideration to the potential for small scale AD plants.</p> <p>The WCS will not make specific provision for individual 'waste streams' but whether plants treat individual or mixed waste streams would be a commercial decision for the operator when developing a proposal.</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>The document takes little account of cross-border collaboration in terms of modern spatial planning. The JWMS contract which conjoins Herefordshire and Worcestershire until 2026 can be viewed as an asset or a burden, but it does offer opportunities for more joint working which the WCS could develop. Proposals for future sustainable waste management solutions should take account of such close relationships and perhaps include other counties.</p>	<p>The Waste Core Strategy will enable the reviewed Joint Municipal Waste Management Strategy to be implemented. Defra is currently trying to improve the accuracy of data regarding cross-border movements of waste. We will use the best information available. We intend to show relationships with other counties graphically in developing the submission document. We welcome any proposals for joint working.</p>
OQ31-1678	Mr D Desmond	<p>Composting is better than burning for obvious reasons. There is evidence of risks from dioxins in recent research. I can supply details if requested. Monitoring of existing sites is [inadequate].</p>	<p>The Environment Agency is responsible for advising the council on the pollution implications of waste management proposals and will be consulted on both the emerging strategy and any specific proposals. Defra's advice is that there is no credible evidence of adverse health outcomes for those living near incinerators (Waste Strategy 2007, p77). The Environment Agency, the County Council and District Council Environmental Health Officers all have a role in monitoring facilities.</p>

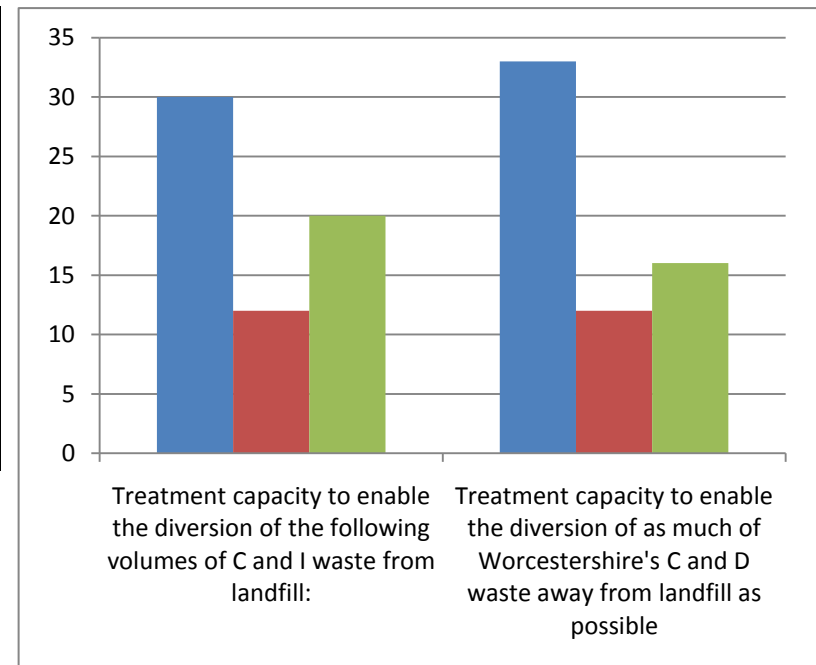
Diversion from Landfill

Treatment Capacity to enable the diversion of the following volumes of C and I waste from landfill

- 524,257 tpa by 2010/11**
- 572,818 tpa by 2015/16**
- 628,028 tpa by 2020/21**
- 690,799 tpa by 2025/26**
- 843,505 tpa by 2035/36**

And treatment capacity to enable the diversion of as much of Worcestershire's C and D waste away from landfill as possible.

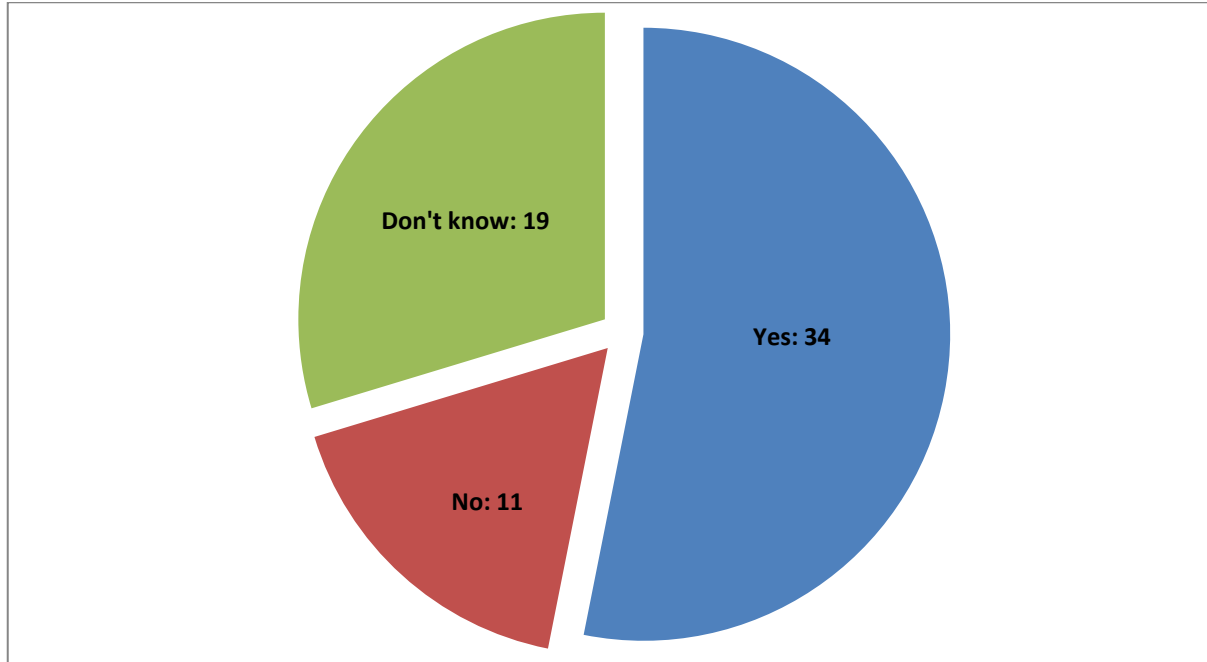
Diversion from Landfill	Yes	No	Don't know
Treatment capacity to enable the diversion of the following volumes of C and I waste from landfill: - 524,257tpa by 2010/11 - 572,818tpa by 2015/16 - 628,028tpa by 2020/21 - 690,799tpa by 2025/26 - 843,505tpa by 2035/36	30	12	20
and treatment capacity to enable the diversion of as much of Worcestershire's C and D waste away from landfill as possible	33	12	16



Reference	Name/Organisation	Summary of comments	Initial officer response
PR52-1679	Martin Pollard/Nick Roberts, <i>Axis on Behalf of Mercia Waste Management (MWM)</i>	MWM welcomes the presentation of the landfill capacity figures as maximums. However, it should be explicitly stated within the Core Strategy that the Council will actively encourage the management of this waste further up the waste hierarchy in order to maximise the benefits. Bullet point 6 on page 20 of the Core Strategy EPO should be amended to reflect this.	Agreed. The waste hierarchy will form an overarching theme of the policies in the Strategy.

New Waste Transfer Capacity

300,000t additional transfer capacity to meet a ratio of 1tonnes waste transfer capacity to 3tonnes waste management capacity



Reference	Name/Organisation	Summary of comments	Initial officer response
PR6-330	David Doley, <i>Banbury Windows Ltd</i>	See Q1 response. Local preferred option for the disposal/re-use of 'clean' sub soil ie raising of land in flood.	The Waste Core Strategy will explore optimum ways of reusing these materials but it is Government policy to restrict the use of waste materials and this is regulated by the Environment Agency.
PR25-681 PR49-1623	Ivor Pumfrey, <i>Malvern Hills District Council</i> & Andrew Ford, <i>Wychavon District Council</i>	We welcome the proposed additional 300,000 tonne transfer capacity but stress that this capacity needs to be distributed across the county rather than concentrated at a few larger locations. The development of transfer capacity is key to future municipal waste management arrangements and must be aligned to future developments in the JMWMS.	Noted and agreed.
PR52-1679	Martin Pollard/Nick Roberts, <i>Axis on Behalf of Mercia Waste Management (MWM)</i>	MWM disagree with the basis of calculating new Waste Transfer Station Capacity. The approach to this should be, in the case of MSW, aspiring for each district / borough not served by residual treatment / facilities to have a transfer facility. Furthermore, the approach is flawed in terms of C&I waste as in reality practically all commercial transfer stations will incorporate a recycling capability (i.e. there will be on-site segregation of recyclable material).	Noted. The Waste Core Strategy will allow for the implementation of the reviewed Joint Municipal Waste Management Strategy in this respect. We recognise this issue in the <i>Waste Transfer Stations</i> background document and we anticipate that an analysis of this recycling capability will become available during the life of the strategy and that the need for transfer station/recycling capacity will be revised through the monitoring process. We will research methods of calculating waste transfer capacity further during the development of the strategy.
OQ4-601	T.C Ward, <i>Kempsey Parish Council</i>	Comments on C&D in previous answer throw some doubt on the overall treatment capacity	Noted, please see previous comment. Predictions of C&D arisings are based on

Reference	Name/Organisation	Summary of comments	Initial officer response
		figures. With regard to the transfer capacity the basis for this calculation is also in doubt.	WMRA data, see the <i>Waste Arisings</i> background document.

General Comments on question 2

Reference	Name/Organisation	Summary of comments	Initial officer response
PR16-1216	Mr M Philpott, <i>Salford Priors Parish Council</i>	We have tried to reconcile the figures in the report but there still seems to be a shortfall of capacity. We believe all options above and possibly more will be required.	Noted. Figures will be reassessed. There will be a further opportunity to comment on the options selected during the pre-submission consultation stage in early 2011
NQ16-719	Hilary Berry, <i>Environment Agency</i>	The document states that the preferred options for dealing with Municipal Solid Waste are likely to closely follow the proposals of the Herefordshire and Worcestershire JMWMS. From our understanding, the JMWMS commits to locating the treatment facilities for the MSW from both counties in Worcestershire. It does not seem a sustainable arrangement for there to be no provision for treating the MSW produced in Herefordshire in Herefordshire itself. The “waste miles” generated alone would indicate the need for treatment capacity in Herefordshire for MSW that has been generated there. This does not accord at all with PPS10 or the draft policies WCS1 and WCS2. As far as possible, Worcestershire WPA should be looking to reduce the amount of waste that is both being imported into and exported out of the county. If this is a misinterpretation, we would be grateful for greater clarification.	The reviewed Joint Municipal Waste Management Strategy does not specify where the major waste treatment facility/ies should be located. It does however require that some facilities for the treatment of MSW are/will be located in Herefordshire e.g. composting and bulking plant. The Waste Core Strategy will recognise the need for cross-boundary co-operation, however it is inevitable that economies of scale mean that some wastes will be imported and exported into and out of the county. The strategy will seek to minimise this and will be based upon achieving equivalent self-sufficiency in waste management capacity.

Reference	Name/Organisation	Summary of comments	Initial officer response
NQ16-719	Hilary Berry, <i>Environment Agency</i>	<p>We strongly support the council’s preferred option for C and I waste (p21). However, there is an assumption that the target of 75% C and I waste not sent to landfill will be achieved through “most of the conventional means of waste collection, transfer and management”. This overlooks the very real need for improved access for businesses to waste collection services that are cost effective rather than prohibitive. Many businesses claim that they don’t source segregate more of their waste for recycling because it is not cost effective for them to do so. This leads to limited source segregation of waste with the majority being sent to landfill. Therefore the WCS needs to consider both the importance of working with businesses to better educate them about the long-term economic benefits of source segregation of waste for recycling, both for their business, and for the economy as a whole, and to better assess their needs in terms of waste management infrastructure.</p>	<p>Agreed. Change to be made to expressly state these ideas. This is a matter which will also be explored through the council's economic development role and we will bring this matter to the attention of the economic development team.</p>
NQ16-719	Hilary Berry, <i>Environment Agency</i>	<p>Construction and Demolition waste: We recommend that the statement below (page 26) should be re-worded to state more definitely that a policy will be developed to encourage this. “In practice, we believe that most C and D waste will continue to be recycled in an ad hoc way as sites are redeveloped. We intend to see if a policy should be developed to encourage this”.</p> <p>This statement does not take account of the fact that the production of Site Waste Management</p>	<p>Support for the suggested policy noted.</p> <p>Change to be made to expressly refer to SWMPs.</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>Plans (SWMP's) is a legal requirement for any developments with a capital value of greater than £300,000. The importance of promoting SWMPs as well as more sustainable procurement practices (e.g. use of recycled aggregate in new developments – which also links in with previous point made about potential use of incinerator bottom ash.) is key to ensuring a reduction of C & D waste to landfill. This is covered in part by draft policy statement WCS7 but there is no specific mention of SWMPs and how they will be co-ordinated with the WCS.</p> <p>The WCS does not encourage the adoption of specific recycling targets for C & D waste. It is considered that the adoption of targets is crucial in order to drive performance. The WCS states that “we have no evidence on which to develop a specific target for the county”. Why cannot existing data relating to amounts of C and D waste disposed of at landfill in Worcestershire be used as a baseline (see EA Waste Data Interrogator 2007 and 2008)? In addition the revised Waste Framework Directive places a duty on member states to ensure that 75% of non-hazardous construction and demolition waste should be recycled by mid 2020. This further puts an onus on Worcestershire to commit to measurable recycling targets for C & D waste that are both ambitious and realistic.</p> <p>No recycling targets have been set for C and I</p>	<p>Noted. Change to be made to include a specific target. The detail will depend on the availability of data on waste arisings for C&D waste. As a minimum we will include the Waste Framework Directive target for the capacity needed.</p> <p>Agree to consider developing a specific</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
		waste. It is seen as crucial to set measurable targets for recycling a percentage of C & I waste arisings from within the county in order to act as a driver to the diversion of this waste stream up the waste hierarchy.	target.
NQ16-719	Hilary Berry, <i>Environment Agency</i>	<p>Hazardous waste (p.25) No additional sites are planned in the county for treating hazardous waste and there appears to have been no recognition of the need for treatment of residual hazardous waste. Hazardous waste is highly variable in nature and therefore requires often quite specific forms of treatment. Although there is sufficient transfer capacity within the county there is no additional treatment provision proposed. It is not clear how much of the hazardous waste produced within the county is exported out for treatment and whether this has been assessed as part of the WCS.</p> <p>We would have expected the issue of hazardous waste to have been given greater consideration in the consultation, especially given the varied kinds of hazardous waste e.g. clinical waste, hazardous industrial waste, hazardous waste from domestic sources that are produced at civic amenity sites. For example, hazardous waste has not been considered in terms of land needed for processing and treatment in the county.</p> <p>The emerging preferred option for managing hazardous waste is to maintain the existing situation, where transfer provision will be made</p>	<p>It is true that no sites are planned but we will investigate including specific policies to enable them to be permitted. The WMRSS states that there is adequate hazardous waste treatment capacity in the region and, due to economies of scale, does not require Local Planning Authorities to make express provision for further capacity. We will seek the Environment Agency's advice on the rest of these matters.</p> <p>The background document <i>Hazardous Waste</i> explores these issues and will be revised. Clinical waste is considered separately from hazardous waste in the background document <i>Waste Arisings from Healthcare and Related Activities</i>. These are available from our website www.worcestershire.gov.uk/wcs.</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>but without any form of treatment within the county. We suggest that the management of the county's hazardous waste, as far as practicable, within the county is a more sustainable solution than the transport costs and carbon footprint of exporting it out of the county.</p> <p>In addition, the impact of legislation such as the Batteries Directive is likely to increase the quantities of hazardous waste that is being produced within the county over the period of the strategy. A re-examination of the scale and types of hazardous wastes that are produced within the county and the optimum management solution is therefore recommended.</p> <p>The re-assessment should also look at where these waste streams are ultimately disposed of or recovered (this is almost certainly likely to be outside of the county) and should consider the "waste miles involved" in the transport of these wastes to their respective disposal points. The result of such an assessment could identify a very real need for treatment capacity to be provided within the county.</p>	
PR21-695	David Ingelby <i>Gloucestershire County Council</i>	Hazardous waste should be planned for.	Noted and agreed, see above.
PR24-1645	Mrs L Brookes	Technology will change dramatically in the next 25 years. Waste Disposal will become cleaner and more cost effective. "Our key word must be flexibility" a large incinerator would be under used leading to burning of recyclable and hazardous	Noted. The Waste Core Strategy will take into account the implications of all types of waste management facilities. It will be as flexible as possible in order to cope with technological change but it does not favour any specific

Reference	Name/Organisation	Summary of comments	Initial officer response
		waste.	technology type.
PR26-1653	Mr A and H Jones	Thermal treatment (incineration) is not the solution. There are other methods ie AD which more readily fits into a true recycling/waste reduction at source philosophy	Noted. The Waste Core Strategy will take into account the implications of all types of waste management facilities. It will be as flexible as possible in order to cope with technological change but it does not favour any specific technology type. There are limitations to the types of waste which can be managed through AD and the advantages and limitations have been considered in the background document <i>Resource Recovery from Biodegradable Waste</i> , available on our website www.worcestershire.gov.uk/wcs .
PR29-1650	Mr S Tranter	We are entering a reverse economic cycle cuts are already planned for Worcestershire CC of 15% dramatic slow growth the lowest in 60 years. People are going to have less disposable income. Less purchased=less waste.	Noted. The strategy will apply until at least 2027 and will be regularly monitored and reviewed. In line with regional and national policy, we are consciously pursuing ambitious targets as a worst-case scenario. We do not think that market forces will support an over-provision of facilities.
PR33-1654	Mr RE Price	Alternative measures to incineration and landfilling must be found for residual waste. Greater emphasis should be on recycling and avoiding the making of waste in the first place.	Noted and agreed. The Waste Core Strategy will be updated to make express reference to the Waste Hierarchy.
PR37-1656	Mr C Rogers	Treatment of all waste segregated and reused. Biodigestion of new types of packaging and food waste. Tax companies who don't recycle so that you can do it for them.	The Waste Core Strategy will be as flexible as possible in order to cope with technological change but it does not favour any specific technology type. Taxation and incentives are a matter for national government.
PR38-Anon	Anonymous	More movement access in the County seems to	It is inevitable that economies of scale mean

Reference	Name/Organisation	Summary of comments	Initial officer response
		be against your carbon footprint statements.	that some wastes will be imported and exported into, out of and across the county. The strategy will seek to minimise this and will be based upon achieving equivalent self-sufficiency in waste management capacity. Proposed policy WCS1 considers the need to minimise waste miles.
PR30-1649	Mr and Mrs C Jones.	Do not believe that burning waste is environmentally friendly. Encourage less PRIMARY waste and more recycling.	Noted. Agreed.
PR39-1657	Tom Beard, <i>Ecconomic Solutions ltd, Heartfood, Worcester Greenpeace, Transition Foods</i>	Thermal treatment too high, composting or AD too low. I'm not convinced there is currently enough immediacy in commercial and industrial waste. Not all collections and disposal firms are doing enough to increase recycling, reduction, reuse and reclaim. If the market is failing then local government should intervene to ensure the best treatment facilities are in place for managing waste.	Noted. The Waste Core Strategy will allow for the provision of facilities which could take both municipal and commercial and industrial waste streams. Development of such facilities would depend on market forces and political will.
PR48-1622	Lindsay Wood, <i>Worcester City Council</i>	Agree with objectives but no knowledge as to whether figures are correct.	Noted.
PR48-1622	Lindsay Wood, <i>Worcester City Council</i>	If there is the possibility that legislation could come into play to enforce the collection of waste food should progress, again is there provision for a facility that would allow somewhere to be provided for the subsequent disposal.	The Waste Core Strategy will be monitored and reviewed to take such issues into account as they arise. The Waste Core Strategy will be as flexible as possible in order to cope with changing situations.

Reference	Name/Organisation	Summary of comments	Initial officer response
PR48-1622	Lindsay Wood, <i>Worcester City Council</i>	If the proposal for Hartlebury [autoclave] is not approved and an alternative is then put forward much further away from Worcester – is there an allowance in these documents that would allow for a transfer station somewhere much nearer to avoid the additional travel.	The autoclave at Hartlebury was approved and has now lapsed. The MRF at Norton, near Worcester, will function as a transfer station serving whatever other facilities are developed to manage MSW in Worcestershire.
PR25-681 PR49-1623	Ivor Pumfrey, <i>Malvern Hills District Council</i> & Andrew Ford, <i>Wychavon District Council</i>	We support your proposals for the development of Preferred Options to provide additional waste management capacity within the County.	Support noted.
PR51-659	Mr D Rook, <i>Stourport on Severn Town Council</i>	Feel unable to comment - is too specialist for lay people.	Noted.
OQ6-1666 OQ7-1444	Mrs E Morgan Mr P Morgan	As with the previous question, it is stupid to expect us to agree your figures when the basis and validity of them is not apparent. With regard a thermal treatment facility, this is presumably the planned facility at Hartlebury with is economically unacceptable - it is also contrary to many aspects of the rest of the strategy such as reducing transport of waste by road, producing a cleaner environment, etc, etc. The landfill capacity figures are too high - in particular the council should make far for effort to reduce industrial figures and has clearly been	The issues are necessarily complex, but due to the size of the document some information was not included. Instead it was available alongside it in the background documents, particularly the <i>Waste Arisings</i> document, available on our website www.worcestershire.gov.uk/wcs . The emerging Waste Core Strategy does not include any commitment to incineration or to any specific technology or location. We agree that the focus should be on waste reduction and as such Objective 2 is to do everything possible to minimise waste production.

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>incompetent in not doing so up to now.</p> <p>The comment about treatment capacity for C & D is meaningless - we need more definitive information not just "...as much....as possible".</p>	<p>Agree to consider including a specific target. This will however depend on the availability of data on waste arisings for C&D waste. As a minimum we will include regional targets for the capacity needed</p>
OQ6-1666	Mrs E Morgan	<p>The comment about treatment capacity for C & D is meaningless - we need more definitive information not just "...as much....as possible".</p>	<p>See comment above.</p>
OQ10-1503	Mr B Jordan	<p>I think your documentation is misleading. There should be more emphasis on reduction of waste and re use and recycling.</p>	<p>We agree that the focus should be on waste reduction and as such Objective 2 is to do everything possible to minimise waste production.</p>
OQ11-1689	Dr A Judge	<p>Municipal Solid Waste (MSW) should be segregated and sorted. Large quantities of organic material that are currently contained in unsorted MSW should be treated by anaerobic digestion, with energy recovery from biogas. A strategy which relies so heavily on incineration is outdated and is contrary to the Stockholm Convention.</p>	<p>The emerging Waste Core Strategy does not include any commitment to incineration. There are limitations to the types of waste which can be managed through AD and the advantages and limitations have been considered in the background document <i>Resource Recovery from Biodegradable Waste</i>, available on our website www.worcestershire.gov.uk/wcs.</p>
OQ13-1667	Mr A Murcott	<p>It is difficult to comment on the figures because I don't have expert knowledge. However the council appears to be throwing most of its waste eggs into one waste basket and burning it! It doesn't appear to be very ambitious in terms of persuading people and organisations to reduce their waste, which must be the priority, and it doesn't appear to be very ambitious in its use of</p>	<p>See comment above. The emerging Waste Core Strategy does not include any commitment to incineration or to any specific technology or location. We agree that the focus should be on waste reduction and as such Objective 2 is to do everything possible to minimise waste production.</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
		composting and AD facilities unlike councils in other parts of the country.	
OQ15-1668	N and K Dowty	C&I waste diverted from landfill should be recycled as new technologies enable more recycling. There is no requirement for incineration as if all waste that can possibly be recycled or composted is removed, the remainder leaves about 20,000 T p.a.(MSW) which could be dealt with using gasification or other upto date technology. This volume does not financially justify an incinerator and is not a good use of tax payers money.	The Waste Core Strategy is not technology specific. We include gasification within our definition of Thermal Treatment, along with incineration and other technologies. The reviewed Joint Municipal Waste Management Strategy deals with how municipal waste will be treated and it specifies the need for residual treatment but not specifically incineration.
OQ17-1669	Mr A Pulley	Shouldn't we be looking at the manufacturers to reduce the amount of waste produced in the first instance? Household waste should be split into two groups, easily recyclable and biodegradable. Burning it and calling it 'green' is basically a joke.	We agree that the focus should be on waste reduction and as such Objective 2 is to do everything possible to minimise waste production. The reviewed Joint Municipal Waste Management Strategy deals with how municipal waste will be treated. It specifies that as much household waste as possible should be recycled. It identifies the need for residual treatment of waste that cannot be readily recycled.
OQ19-1671	Mr R Archard	Thermal treatment is an outmoded technology; recyclable material should be recycled and biologically active waste should be digested. The latter is most important as it is this that causes landfilled waste to generate methane. If the decision is taken to incinerate then the	We define thermal treatment as including a variety of technologies. These technologies are considered alongside Anaerobic Digestion in the background document <i>Recovering Energy from Waste</i> . We will update policy proposals to address

Reference	Name/Organisation	Summary of comments	Initial officer response
		hazardous waste will increase dramatically.	the amount of hazardous waste likely to be produced by waste management facilities. When proposals are submitted we will be advised by the Environment Agency and District Council Environmental Health Officers on the significance of any hazardous waste arisings and how they should be managed.
OQ20-1672	Mrs M and Mr L Philips	The serious health consequences of fine particulate pollution have become apparent in the last 10 years so incineration is the least preferred method of getting rid of waste. Far safer methods are now available including recycling, mechanical biological treatment and plasma gasification, a combination of these would be safer and cheaper in the long run.	The Environment Agency is responsible for advising the council on the pollution implications of waste management proposals and will be consulted on both the emerging strategy and any specific proposals. Defra's advice is that there is no credible evidence of adverse health outcomes for those living near incinerators (Waste Strategy 2007, p77). The Waste Core Strategy is not technology specific. We define thermal treatment as including a variety of technologies.
OQ23-1673	T Jauncey	Whilst I agree with some of these principles, it is the figures I cannot see stacking up!! All of these waste management schemes should be kept at a small level to meet local needs. Too much travel will defeat the object.	Transport issues will be explicitly considered in drawing up the detailed options. Proposed policy WCS1 sets out criteria including the need to minimise waste miles. Proposed policy WCS2 seeks to encourage facilities close to arisings.
OQ28-696	Deborah Klein, <i>Herefordshire Council</i>	Increased use of AD or IVC could be promoted through these Options, to include farm diversification and renewable energy projects. If landfill diversion is achieved as envisaged, the composting site at Hill & Moor should be secure for the life of the plan. The contractors have given assurance there is no intention to close that site in	Agreed. Policies will be developed to encourage low carbon energy from waste management methods and to enable this in farm locations where appropriate. We have built in contingencies to secure capacity for composting of MSW in draft policy WCS8. This approach will be retained

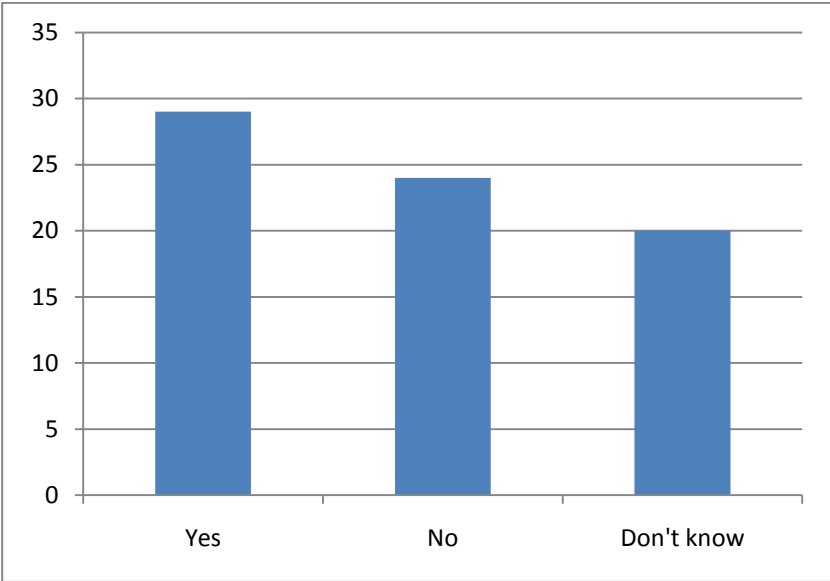
Reference	Name/Organisation	Summary of comments	Initial officer response
		the near future.	in the development of policy proposals. We also intend to monitor and review composting capacity during the life of the strategy
OQ29-164	Mary Tappenden, <i>Biffa Waste Services Limited</i>	<p>We would just like to make the point (and it appears to be supported by the statement in the report that it is necessary to make a "high provision for waste management capacity") that the projections indicate a "capacity gap" and not a "capacity cap" i.e. if more facilities are provided than is required to fill the capacity gap then this is beneficial as it further reduces the amount of waste deposited in landfill sites.</p> <p>Please note that the heading for Table 5 should be "maximum landfill" and not "minimum landfill"</p>	<p>Agreed. The strategy will be based on the concept of a capacity gap and there is no intention to limit the number of facilities provided subject to the concept of equivalent self-sufficiency for Worcestershire.</p> <p>Noted.</p>
OQ30-1684	Seskco3 (email address)	Insufficient detail available for accurate assessment.	<p>The issues are necessarily complex, but due to the size of the document some information was not included. Instead it was available alongside it in the background documents available on our website www.worcestershire.gov.uk/wcs.</p>

Question 3

Question 3a

If no, please could you explain why and suggest alternatives.

	Yes	No	Don't know
Do you agree with our proposals for how much land we are likely to need for where new Waste Management Facilities should be permitted?	29	24	20



Reference	Name/Organisation	Summary of comments	Initial officer response
PR10-1649	Mr P Vernon	Less land is needed for Anaerobic digestion with energy recovery via biogas. Clean energy is gained and useful fertiliser produced. We must avoid incineration - land in public ownership may still be used for AD.	The Emerging Preferred Options paper is not technology specific and seeks to allocate land from both thermal treatment and AD facilities. <i>Worcestershire Waste core Strategy Background Document: Recovering Energy from Waste</i> considers issues relating to both thermal treatment and anaerobic digestion.
PR16-1216	Mr M Philpott, <i>Salford Priors Parish Council</i>	We support the use of sites on industrial areas for waste treatment plants with the proviso that transport links are satisfactory.	Agreed.
NQ13-1624	<i>Wyre Forest District Council</i>	Regarding p.30 “The RSS is quite clear, that there is a hierarchy of where development should be focused. There is no evidence to justify not following this.” Agree with this approach. Development for waste facilities should be in line with the levels of development proposed for each area in the County, and should also focus on the proximity principle.	Support noted and agreed.
NQ13-1624	<i>Wyre Forest District Council</i>	Regarding hierarchy set out on page 30. Generally agree with the hierarchy identified. However, it is considered that Bewdley differs in form and function to that of Evesham and Stourport-on-Severn and should be included lower down the hierarchy. Bewdley would sit more comfortably with Tenbury (as it is also a market town located in the RRZ) or with Pershore and Upton, which have similar characteristics and constraints to development.	Agreed, change to be made.
NQ13-1624	<i>Wyre Forest District Council</i>	General support for the approach to C&I waste (using new employment land as an indicator).	Data on waste arisings is poor and will be monitored during the life of the Strategy. We

Reference	Name/Organisation	Summary of comments	Initial officer response
		However, this must also be considered in line with where current waste is being generated from and also where current facilities exist and seek to address any current location 'gaps'.	intend to compare known waste arisings (Figure 2) with known facilities (Figure 3) to explore this concept.
NQ13-1624	<i>Wyre Forest District Council</i>	Support the approach for developing new facilities on existing and future industrial estates. Preference should also be given to developments on previously developed land.	Support noted and agreed.
NQ13-1624	<i>Wyre Forest District Council</i>	Regarding "The County Council intend to develop the strategy by identifying a long list of possible locations for new facilities... They intend to produce a series of plans showing different ways of distributing how much capacity we need and relating this to the research on the availability of land. The end product will be a set of alternative Options on a map base during 2010 and the analysis of which Option is preferred." The District Council wishes to be involved in the consultations on the proposals.	Agreed, we will involve all the District, Borough and City Councils and others.
NQ13-1624	<i>Wyre Forest District Council</i>	P.35: " New development will be assessed against all relevant national and regional policies" Agree with this sentence but should include a reference to local policies as well, most notably the District Council's Local Development Framework.	Agreed. Change to be made.
NQ13-1624	<i>Wyre Forest District Council</i>	p.36: " For the purpose of developing ideas we propose therefore to include a requirement that facilities over 1000sqm gain 10% (or more, if local targets are higher) of energy supply from alternative or renewable sources. Your comments	Support noted.

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>are particularly invited on this”</p> <p>This would be broadly in line with Wyre Forest’s emerging Core Strategy and so is supported.</p>	
NQ13-1624	<i>Wyre Forest District Council</i>	<p>Regarding: p.42: "We need to make provision that Greenfield sites may be acceptable provided that the proposal does not result in significant adverse impact on the countryside or its functions, that proposals would be compatible with their setting and would not have unacceptable direct or indirect impacts on matters of acknowledged importance in national, regional or local policy and that they would not significantly conflict with other spatial planning objectives in the LDF."</p> <p>Wyre Forest District’s emerging Core Strategy seeks to direct development to previously developed land and so any future Greenfield proposals would be in conflict with the Development Strategy proposed for the District, and are likely to not be supported.</p>	Noted. We will discuss this issue further with all the district councils.
PR19-674	Mrs Williams, <i>Wick Parish Council</i>	You employ people to research, evaluate and make proposals. Why do this if their advice is disregarded.	Consultation is regarded as an important part of the process of developing strategies, in order to allow the public and interested parties to influence proposals. The final strategy will need to be considered and approved by the County Councillors.
NQ16-719	Hilary Berry, <i>Environment Agency</i>	In Part 7 on developing the strategy, there appears to be little consideration of the fact that waste arisings in the county should be reduced between 2007-2027, in line with Objective WO2.	We agree that waste minimisation is of great importance and we will develop references to this in developing policies for the WCS.

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>While it is true to say that treatment and transfer capacity will need to increase annually based on the requirement to divert waste away from landfill, the overall waste arisings should reduce throughout the life of the strategy. Therefore this could impact on the amount of land that is required for treatment and transfer. We are of the view that the importance of waste minimisation has been understated in the report. Waste minimisation is at the top of the waste hierarchy and as such should be given due consideration</p>	<p>The strategy must take account of regional planning policy which currently assumes an increase in arisings up to 2026.</p>
NQ16-719	Hilary Berry, <i>Environment Agency</i>	<p>While the WCS does account for the locations of existing waste management facilities and the types of these facilities, there is no strong linkage as to how this is likely to influence the spatial hierarchy or distribution of proposed new waste management facilities within the county. PPS10 promotes the 'proximity principle' and so this should be considered. However, a needs assessment is crucial to determine the locations of new waste management facilities. For example, there does not appear to be due consideration or assessment of the catchments that are served by existing waste facilities, both for MSW and C & I waste e.g. if a particular urban area is already well served by a number of local waste management facilities and these facilities have capacity to cope with the projected increase in waste arisings and the types of arisings over the plan period a new facility will not be required.</p>	<p>Data on waste arisings is poor and will be monitored during the life of the Strategy. We intend to compare known waste arisings (Figure 2) with known facilities (Figure 3) to explore this concept.</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
PR21-695	David Ingleby <i>Gloucestershire County Council</i>	Potentially 1ha to process 50,000 tpa is a little tight. In Gloucestershire we are looking at a minimum of 2 ha for strategic facilities. Eg strategic is 50,000 tpa and 1 ha may be suitable for smaller facilities.	Noted, change to be made. The Council will make a more detailed assessment of existing sites in the county, based on the information presented in the background document <i>Waste Sites</i> and national research papers and revise the figures accordingly.
PR24-1645	Mrs L Brookes	"Waste management facilities should be located as close to arisings as possible". Land should be used in accordance with local planning principles. Located in several (local) locations, anaerobic Digestion would be more cost effective and use less land, whilst producing power and fertilizer.	Agreed. The advantages and limitations of Anaerobic Digestion have been considered in the background document <i>Resource Recovery from Biodegradable Waste</i> , available on our website www.worcestershire.gov.uk/wcs .
PR25-681 PR49-1623	Ivor Pumfrey, <i>Malvern Hills District Council</i> & Andrew Ford, <i>Wychavon District Council</i>	The rationale behind the amount of land needed appears sound however we feel there is a need for transfer capacity to be dispersed to meet local need and this may require an aggregate greater amount of land than the proposed 6HA.	Noted. This is an issue we intend to explore further.
PR27-1652	Mr TJ Harrop	The plan should seek to avoid initial waste production and to improve the level of recycling. Simply increasing the amount of land used to get rid of waste is obscene	Policy will be based on the waste hierarchy which seeks to do just this.
PR28-1651	Mr S Tranter	AD uses less land as a high recovery rate of biogas, fertiliser is created, We mainly live in a rural county. AD can be sited in small modular plots, which means you only need build what is required. Not a very large incinerator. The way forward is AD.	The Waste Core Strategy is not technology specific. The advantages and limitations of Anaerobic Digestion have been considered in the background document <i>Resource Recovery from Biodegradable Waste</i> , available on our website www.worcestershire.gov.uk/wcs .
PR30-1649	Mr and Mrs C Jones	Your report p29 states "area cannot be specified at present".	Question 3 asked how much land we are likely to need. We will explore this issue further, taking into account these consultation

Reference	Name/Organisation	Summary of comments	Initial officer response
			responses.
PR31-Anon	Anonymous	Have you got your figures right on this one.	See note above.
PR32-1648	Mrs G Sanderson	I would wish to protect Greenbelt and local planning authorities.	Noted. Policies will be in accordance with national planning policy to protect Greenbelt.
PR33-1654	Mr RE Price	Alternative measures should be considered and are available to reduce the demand for land for waste management facilities e.g. Anaerobic digestion and there should be a greater emphasis on recycling and ensuring a reduction in the creation of waste e.g. unnecessary packaging.	The Waste Core Strategy considers alternatives for waste management and is not technology specific. The advantages and limitations of Anaerobic Digestion have been considered in the background document <i>Resource Recovery from Biodegradable Waste</i> , available on our website www.worcestershire.gov.uk/wcs . Objectives 2 and 4 emphasise waste reduction and recycling.
PR37-1656	Mr C Rogers	Any residual disposal of waste (in the short term 5-10 years) should be processed locally in small quantities (reduce mileage travelled). Not large scale incineration.	The Waste Core Strategy must apply for a minimum of 15 years. The emerging Waste Core Strategy does not include any commitment to incineration. We will develop policies to encourage that wastes are managed close to arisings wherever possible and to reduce waste miles. This has been the basis for policy WCS2.
PR39-1657	Tom Beard, <i>Ecohomonic Solutions Ltd, Heartfood, Worcester Greenpeace, Transition Foods</i>	The plans appear correct for what the council intend to do according to the preferred options. Besides the E and F the other options basically involve burning waste, which is low down on the EU hierarchy for waste, for a very good reason. Therefore your rhetoric is hypocritical. Alternatively reduce spending in unnecessary areas and produce the CAPEX.	The reviewed Joint Municipal Waste Management Strategy sets out how municipal waste should be managed and identified options A-G.

Reference	Name/Organisation	Summary of comments	Initial officer response
		[next section represented diagrammatically-see paper doc] C&I and Household waste collected by fleets running in biogas fuelled electric vehicles, to transport clean recyclables from one bin, collect food waste to AD which is topped up with maize to produce biogas. Contaminated general waste from other bins, take to autoclave or thermal then to landfill.	These are matters for the Joint Municipal Waste Management Strategy.
PR41-1658 PR44-1680	Mr Meredith & Mr R Meredith	Anaerobic digestion - cleaner than incineration, less pollution gas. Use of remaining product, fertiliser.	The Waste Core Strategy is not technology specific. The advantages and limitations of Anaerobic Digestion and thermal treatment have been considered in the background document <i>Recovering Energy from Waste</i> , available on our website www.worcestershire.gov.uk/wcs .
PR42-1659	Mrs L Meredith	Anaerobic digestion - cleaner than incineration, less pollution, gas can be obtained from it and fertilise. There would also be less public opposition	The Waste Core Strategy is not technology specific. The advantages and limitations of Anaerobic Digestion and thermal treatment have been considered in the background document <i>Recovering Energy from Waste</i> , available on our website www.worcestershire.gov.uk/wcs .
PR52-1679	Martin Pollard/Nick Roberts, <i>Axis on Behalf of Mercia Waste Management (MWM)</i>	MWM generally supports the Council's aspiration to quantify the land requirements for new waste management facilities. However, the company notes the following: 1. We disagree with the inference that less land may need to be identified on account of existing permissions for circa 700,000tpa of capacity. In	Noted. Noted, we will explore further how we take account of existing unimplemented permissions. The strategy will be monitored

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>MWMs experience the majority of such permission will never be implemented due to commercial, financial, market or contractual reasons (e.g. the Estech autoclave proposals).</p> <p>2. The 1HA per 50,000tpa management capacity is a sweeping generalisation, too rigid and should not constrain the identification of sites. The waste planning authority should not be concerned by identifying an oversupply of sites as the market will ultimately dictate what comes forward.</p>	<p>annually and reviewed to take account of changes in capacity.</p> <p>Noted, change to be made. The Council will make a more detailed assessment of existing sites in the county, based on the information presented in the background document <i>Waste Sites</i> and national research documents and revise the figures accordingly.</p>
OQ6-1666	Mrs E Morgan	<p>The more sustainable and environmentally best options involve more local facilities NOT just large central facilities which is what you are doing now. More local facilities takes up more land. Concentration on large primary facilities is wrong and environmentally damaging - it is more to do with making things easier for the council than providing a good, environmentally efficient service for people.</p>	<p>The public expressed a preference at three earlier stages of consultation for primarily larger facilities to be developed. Details of these consultations are available on our website at www.worcestershire.gov.uk/wcs. We intend, nonetheless, to develop policies to assess sites of all sizes.</p>
OQ7-1444	Mr P Morgan	<p>The more sustainable and environmentally best options involve more local facilities NOT just large central facilities which is what you are doing now. More local facilities takes up more land. Concentration on large primary facilities is wrong and environmentally damaging.</p>	<p>See above.</p>
OQ11-1689	Dr A Judge	<p>Anaerobic digestion and energy recovery from biogas require less land. It also produces benefits derived from clean energy and agricultural fertiliser. Land should not be used for incineration. Worcestershire should use public land for</p>	<p>The Waste Core Strategy is not technology specific. The advantages and limitations of Anaerobic Digestion and thermal treatment have been considered in the background document <i>Recovering Energy from Waste</i>,</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
		anaerobic digestion plants, which are more environmentally sound and produce fewer impacts on local communities.	available on our website www.worcestershire.gov.uk/wcs .
OQ15-1668	N and K Dowty	Use of existing facilities MUST be maximised and encompass the source of the waste, avoiding transportation of waste from other counties. E.g Herefordshire. Land required for new waste management facilities should not include land on green belt.	Agreed subject to environmental considerations. In accordance with the Panel recommendations on the Phase Two revision of the West Midlands Regional Spatial Strategy we will base policy on the principle of 'equivalent self-sufficiency' but taking into account cross-boundary movements of waste, some of which will be for the export of Worcestershire's waste out of county. Policies will be in accordance with national planning policy to protect Greenbelt.
OQ16-626	<i>Norton-juxta-Kempsey Parish Council</i>	Waste facilities should be close to the point that it arises. Should also not be in close proximity to residential areas.	Agreed. We will develop policies to encourage that wastes are managed close to arisings wherever possible and to reduce waste miles. This has been the basis for policy WCS2. It is national and regional policy to focus waste management facilities on developed land and existing industrial estates and similar non-residential land. We will develop policies to minimise the adverse effects of any proposals. This issue will be fully

Reference	Name/Organisation	Summary of comments	Initial officer response
		Much more use of rail or water for transport.	developed in the policies. Policies will also be developed that expressly seeks to prevent conflict between residential and waste uses. Agreed, this issue will be explored further. The background document <i>Inland Waterways</i> considers the use of water transport for waste and a background document is being prepared to investigate the opportunities for movement by rail.
OQ17-1669	Mr A Pulley	I don't agree with most of the need for the facilities	Noted.
OQ20-1672	Mrs M and Mr L Phillips	How can we be expected to give an informed intelligent opinion without other professional and unbiased advice.	Consultation is regarded as an important part of the process of developing strategies, in order to allow the public and interested parties to influence proposals. The final strategy will need to be considered and approved by the County Councillors.
OQ25-1675	Mr M Harvey	Anaerobic Digestion would produce a more efficient use of land. It also would not contaminate the land around it. Once understood people would embrace this technology rather than the divisive, expensive and polluting incineration. Clean and efficient energy could be gained as well as useful fertiliser.	The Waste Core Strategy is not technology specific. The advantages and limitations of Anaerobic Digestion and thermal treatment have been considered in the background document <i>Recovering Energy from Waste</i> , available on our website www.worcestershire.gov.uk/wcs .
OQ28-696	Deborah Klein, <i>Herefordshire Council</i>	Land for waste management could also be added to or included in B2 industrial land allocations, to increase flexibility.	Agreed. This issue will be explored further.
OQ29-164	Mary Tappenden, <i>Biffa Waste Services Limited</i>	The suggestion that 50,000t of waste requires 1ha of land is curious and is not an approach that we have seen used anywhere else. We are unclear	Noted, change to be made. The Council will make a more detailed assessment of existing sites in the county, based on the information

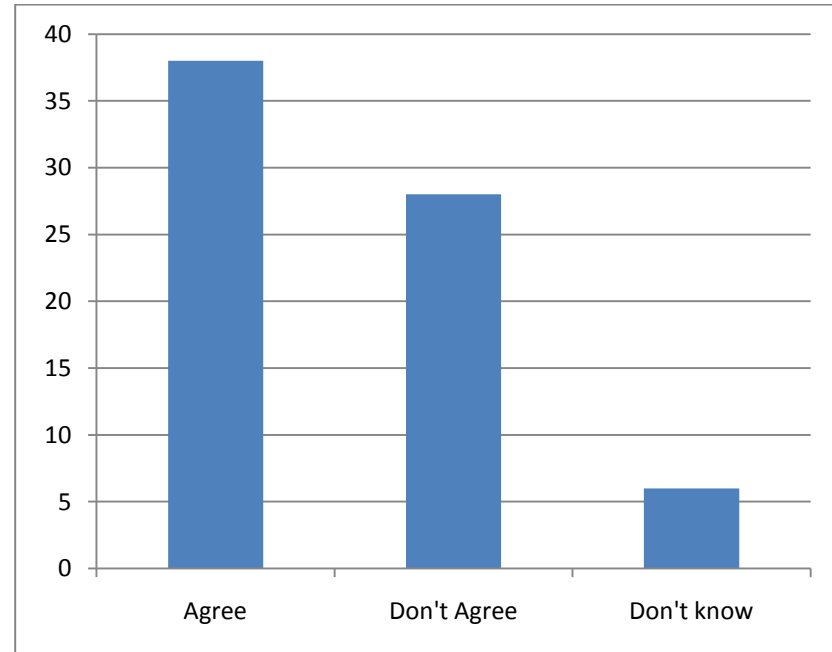
Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>as to how this has been determined. A more appropriate approach is taken in the ERM report at table 5.2, which follows the guidance issued by ODPM in 2004 (Planning for Waste Management Facilities: A Research Study, ODPM, 2004).</p> <p>We note that the plan is relying on employment land and that the ERM study referred to above presents the results of an investigation into all employment land in the County. We note that the report has yet to be accepted by the County Council. We reserve any further comments until (a) the report has been endorsed by the County Council and (b) it is transposed into a list of potentially suitable sites in the Preferred Options stage of the WDF.</p> <p>We also note that the emerging preferred options document suggests that some waste related development is appropriate in the Green Belt. PPG2 states at paragraph 3.4 that the construction of new buildings within the Green Belt is inappropriate with a few listed exceptions, none of which is waste related development. This was an approach also taken in the previous consultation and our comments made in respect of that consultation equally apply here.</p>	<p>presented in the background document <i>Waste Sites</i> and national research papers and revise the figures accordingly.</p> <p>Noted, this issue will be explored further. Change to be made to clarify which sites are identified and how they will be assessed.</p> <p>Policies will be in accordance with national planning policy to protect Greenbelt.</p>
OQ30-1684	Seskco3 (email address)	Insufficient detail, where are the sites proposed?	This question asked how much land we require. The answers we receive from this consultation will help to inform our approach to more specific allocations. Policy WCS2 identifies the order of priority of the broad

Reference	Name/Organisation	Summary of comments	Initial officer response
			locations where new facilities will be developed. We will follow regional planning policy to identify more detailed locations.

Question 3b

	Yes	No	Don't know
Do you agree with our proposed Hierarchy of Broad Areas for Allocating Capacity?	38	28	6

If no, please could you explain why and suggest alternatives.



Reference	Name/Organisation	Summary of comments	Initial officer response
PR10-1649	Mr P Vernon	Greenbelt must be protected as laid down in local plans and therefore should not be included in the strategy unless the development respects the principles of the local plan.	When completed the Waste Core Strategy will form part of the local development framework. This will be used alongside District and Borough Core Strategies (which will replace the old 'local plan') to provide the planning policies against which applications for waste management will be judged.
PR16-1216	Mr M Philpott, <i>Salford Priors Parish Council</i>	We support the idea of waste being located near to the point of waste production. However, for small towns such as Upton or Evesham, the quantities of waste arisings may be insufficient to justify provision of a separate plant.	Noted. We will consult on more detailed locations during 2010.
NQ13-1624	<i>Wyre Forest District Council</i>	Amount of land required for future waste management is noted.	Noted.
PR21-695	David Ingleby <i>Gloucestershire County Council</i>	This accords with the RSS.	Noted.
PR24-1645	Mrs L Brookes	Green belt land should not be included in local waste strategy. The principles of the local plan should be adhered to and not breached. Alternatives need to be investigated. 50% waste recycled in 10 years is appalling. Black bin bags need to be sorted properly.	Policies will be in accordance with national planning policy to protect Greenbelt. When completed the Waste Core Strategy will form part of the local development framework. This will be used alongside District and Borough Core Strategies (which will replace the old 'local plan') to provide the planning policies against which applications for waste management will be judged. Noted. This is a matter for the reviewed Joint Municipal Waste Management Strategy,
PR25-681	Ivor Pumfrey, <i>Malvern</i>	Broadly support the rationale set out in Part 7.	Noted.

Reference	Name/Organisation	Summary of comments	Initial officer response
	<i>Hills District Council</i>		
PR25-681 PR49-1623	Ivor Pumfrey, <i>Malvern Hills District Council</i> & Andrew Ford, <i>Wychavon District Council</i>	<u>Central Technology Belt (CTB)</u> It is noted that the strategy document refers throughout to regional policy initiatives such as the CTB and implications for waste provision and management. It is accepted that this represents a major employment initiative but new uses compatible with the CTB can vary significantly from high technology manufacturing, which can give rise to specialist waste arisings, to essentially research (office) based activities, such as those in Malvern. It would therefore be inappropriate to attempt a "one size fits all" approach to waste provision and management due to the existence of the CTB or similar initiatives.	Noted and agreed.
PR25-681 PR49-1623	Ivor Pumfrey, <i>Malvern Hills District Council</i> & Andrew Ford, <i>Wychavon District Council</i>	<u>Possible Hierarchy of Broad Areas for Allocating Capacity</u> In many respects the hierarchy proposed follows a logical progression to urban locations based upon size through to limited provision in rural areas at the bottom of the hierarchy. With respect to application of the proposed hierarchy there is no direct indication of what types of activity would be directed to various locations within the hierarchy. Further, it not clear how the hierarchy relates to the objectives for locating waste facilities on page 29 of the consultation document.	Noted. The type of activity which will be permitted in different locations will be further clarified.
PR25-681 PR49-1623	Ivor Pumfrey, <i>Malvern Hills District Council</i> & Andrew Ford,	<u>Locating facilities within growth areas</u> We are concerned however, with the level of precision proposed with respect to Worcester and	Our intention is to address all waste arisings and some arisings can realistically be anticipated from future expansion areas. In

Reference	Name/Organisation	Summary of comments	Initial officer response
	<i>Wychavon District Council</i>	<p>"its expansion areas". If the strategy is concerned with making provision in locations where waste arises, it would seem odd to be so specific regarding urban extensions given the scale of existing development in these broad locations.</p> <p>Furthermore, whilst waste facilities may not be incompatible with expansion areas and related employment allocations, it should be recognised that there could be issues surrounding the available capacity of expansion areas due to other planning and environmental considerations. It would therefore be premature and suggest a spurious degree of accuracy to suggest at this stage, within a broad location based strategy, that strategic waste facilities could be accommodated in proposed urban extensions. Such specifics should be tested through an Allocations DPD or via applications for waste development.</p>	order to accord with the WMRSS we need to identify broad areas and supporting policies to address these arisings. These will be discussed with District Councils and other stakeholders.
PR25-681 PR49-1623	Ivor Pumfrey, <i>Malvern Hills District Council</i> & Andrew Ford, <i>Wychavon District Council</i>	<p><u>Use of green field locations</u> In addition the strategy document suggests that waste facilities are likely to be compatible with employment allocations / uses. Elsewhere it is suggested that it may be necessary to take green field land for future waste facilities (see page 42). We consider that if certain types of waste management facilities are compatible with traditional employment areas, the strategy should make clear that proposals would be expected comply with normal sequential test requirements which seek to locate development on PDL in urban areas in the first instance.</p>	Agreed in principle. The relevant policy will make it clear that previously developed land should be used in the first instance and only where this is not possible will certain kinds of development be permitted in the countryside and that green field proposals shall not result in significant adverse impacts on the countryside and matters of acknowledged importance.

Reference	Name/Organisation	Summary of comments	Initial officer response
PR25-681 PR49-1623	Ivor Pumfrey, <i>Malvern Hills District Council</i> & Andrew Ford, <i>Wychavon District Council</i>	<u>Sub-regional apportionment of C & I requirements</u> In relation to suggested methods for apportioning C and I future waste arisings we are not convinced that apportioning provision on the basis of RSS employment land requirements is appropriate. Such an approach does not have regard to the likely types and distribution of employment land to be accommodated at a district level. In the case of Malvern Hills District provision is likely to be dominated by non manufacturing uses, with low representation of heavy industrial uses, and it is also likely to involve some provision across the extensive rural areas in the form of small scale rural enterprises.	Noted. We intend to explore how we can use future waste arisings to identify land requirements. This will be discussed with the District Councils.
PR25-681 PR49-1623	Ivor Pumfrey, <i>Malvern Hills District Council</i> & Andrew Ford, <i>Wychavon District Council</i>	<u>Transportation</u> The consultation document does provide a commentary on transport issues and the principle of reducing road miles for waste movements. However, it is not particularly clear how the strategy is influenced by, or seeks to influence, the LTP and current constraints on the strategic road and rail networks and plans for future investment in these areas.	Noted. We are currently working on this issue. We intend to explore issues of future road capacity and possibilities for the use of water and rail in identifying broad areas for waste management.
PR26-1653	Mr A and Mrs H Jones	Waste needs to be dealt with nearer to source (i.e. smaller facilities throughout H+W) as carbon footprint needs to be considered. Simply, driving waste around in lorries is a nonsense.	Agreed that waste should be managed as close as possible to the source of their arisings. We do, however, have to recognise that there are economies of scale for some facilities.
PR27-1652	Mr TJ Harrop	The continuing erosion of green belt sites must cease. The local plan clearly indicates that such sites are not appropriate for these uses.	We intend to comply with national policy regarding the use of green belt, which limits the kind of uses that will be permitted. When

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			completed the Waste Core Strategy will form part of the local development framework. This will be used alongside District and Borough Core Strategies (which will replace the old 'local plan') to provide the planning policies against which applications for waste management will be judged.
PR29-1650	Mr S Tranter	Land within the greenbelt must be protected from misuse and to use guidance from the local planning authority since they have a better understanding of the local need. Any development should respect the principles of the local plan.	See above.
PR30-1649	Mr and Mrs C Jones	(Ticked No) Because this is including Hereford and Worcestershire's waste. Sites suggested are not all central to the region thus increasing carbon footprint. Smaller more regional facilities should be put in place.	Agreed that waste should be managed as close as possible to the source of their arisings. We do, however, have to recognise that there are economies of scale for some facilities.
PR31-Anon	Anonymous	According to the dictionary this means "Government in sacred matters"?	Noted.
PR32-1648	Mrs G Sanderson	Local Authorities know their own areas and local needs. Local people should decide their future.	We will be undertaking further consultation. The final decision on the content and adoption of the Waste Core Strategy will be made by the Councillors. Local people are also consulted on individual planning applications.
PR33-1654	Mr RE Price	Any development should comply with the terms and conditions of the local plan and County Structure Plan, especially when involving the greenbelt/rural areas.	We intend to comply with national policy regarding the use of green belt, which limits the kind of uses that will be permitted. When completed the Waste Core Strategy will form part of the local development framework. This will be used alongside District and Borough

Reference	Name/Organisation	Summary of comments	Initial officer response
			Core Strategies (which will replace the old 'local plan' and 'structure plan' policies) to provide the planning policies against which applications for waste management will be judged.
PR36-1655	Mrs LM Bryan	Existing sites should be cautiously considered - it would be very unwise to construct a thermal incinerator near to a landfill which leaks methane - a highly combustible gas.	Noted. All applications with potentially significant environmental impacts will be required to include an Environmental Impact Assessment. The Environment Agency and, if appropriate, the Health and Safety Executive will be consulted on any such application.
PR37-1656	Mr C Rogers	Protect greenbelt.	We intend to comply with national policy regarding the use of green belt, which limits the kind of uses that will be permitted.
PR39-1657	Tom Beard, <i>Ecohomonic Solutions Ltd, Heartfood, Worcester Greenpeace, Transition Foods</i>	AD and composting are entirely different biological processes and they process different waste streams so they should not be lumped in the same category as organic waste. AD is energy from waste and should be prioritised further up the hierarchy however, as it is very economical, it changes peoples behaviour actively, reduces landfill emissions considerably and can reduce fuel costs by as much as 90%	Anaerobic Digestion and composting are considered in the background documents " <i>Resource recovery from biodegradable waste</i> ", which can be found on our website www.worcestershire.gov.uk/wcs .
PR41-1658 PR44-1680	Mr Meredith & Mr R Meredith	Local plan needs to be followed and why should 'building' in the Greenbelt be allowed for one and not another.	We intend to comply with national policy regarding the use of green belt, which limits the kind of uses that will be permitted.
PR42-1659	Mrs L Meredith	When allocating capacity it should follow the local plan - no exception! No building on the greenbelt - I would not be able to build a house on it so why should an incinerator be built?	We intend to comply with national policy regarding the use of green belt, which limits the kind of uses that will be permitted. When completed the Waste Core Strategy will form part of the local development framework. This

Reference	Name/Organisation	Summary of comments	Initial officer response
			will be used alongside District and Borough Core Strategies (which will replace the old 'local plan' and 'structure plan' policies) to provide the planning policies against which applications for waste management will be judged.
PR46-1685	M R Jones	Why are all of these sites mainly in the North of Worcestershire.	We need to develop waste management facilities as close as possible to their arisings, these tend to be in the centre and north of the county. The current distribution of waste management sites reflects this.
PR46-1685	M R Jones	<p>Page 14: "In general, waste sites tend to be clustered in or near to towns in the north of the County" Why do we feel the need to build an incinerator in the North of the County? Surely this would be better situated on the Herford/Worcester border which would be moreCentral</p> <p>Page 17 Appendix 3 - Could it be explained why on "the existing waste sites" map 4 there are 2 incinerators indicated which are both north of Worcester - is this due to their closer location to Birmingham? So that waste can be transferred from these to North Worcestershire?? To have everything located in one area can not be environmentally friendly (what has happened to our carbon footprint??)</p>	<p>The Waste Core Strategy is not technology specific and does not propose an incinerator in the north of the county.</p> <p>One of the Incinerators is a very small scale pet crematorium. The catchment for this facility is predominantly the Worcestershire area, with some business from adjoining rural counties.</p> <p>The second incinerator is at Redditch Alexandra Hospital. It deals with clinical waste and due to the specialised nature of this facility it does take waste from outside of the county, however during discussions with the operator it was not suggested there were particularly strong links to Birmingham.</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
PR48-1622	Lindsay Wood, <i>Worcester City Council</i>	It is stated that facilities need to be near employment areas. County need to remain aware that some of Worcester's industrial sites are being put forward for housing/mixed use when sites area being assessed for their suitability. Will need to liaise with Economic Development/Planning about use of potential sites and County's needs and as to whether proposed waste/recycling facilities are compatible with the surrounding employment use/ existing use classes allowed on each individual employment site.	Noted and agreed.
PR48-1622	Lindsay Wood, <i>Worcester City Council</i>	Please note that the Kay's site has planning approval for housing, as it was discussed in a meeting on 3/2/10 that Nick Dean suggested it was one site that was being considered suitable for potential waste/recycling facilities.	Noted, proposals will be revised accordingly.
PR52-1679	Martin Pollard/Nick Roberts, <i>Axis on Behalf of Mercia Waste Management (MWM)</i>	With regard to the hierarchy and location of facilities MWM makes the following comments: 1. Page 30 of the Core Strategy EPO document identifies a number of broad areas where new waste management development is likely to be acceptable. In doing so it makes reference to the 'Central Technology Belt' that has been developed along the line of Longbridge, Bromsgrove, Droitwich, Worcester and Malvern. MWM considers that this 'Belt' should be identified on the key diagram that is prepared in support of the Core Strategy.	Noted and agreed.

Reference	Name/Organisation	Summary of comments	Initial officer response
PR52-1679	Martin Pollard/Nick Roberts, <i>Axis on Behalf of Mercia Waste Management (MWM)</i>	2. As noted on page 31 of the WCS the hierarchy does not take into account a number of large, established industrial / employment sites that are not located within or immediately adjacent to the main towns. It is therefore difficult to see how these would fit within the hierarchy even though they may represent suitable locations for waste. It is essential that such sites are considered.	Noted and agreed.
PR52-1679	Martin Pollard/Nick Roberts, <i>Axis on Behalf of Mercia Waste Management (MWM)</i>	3. The hierarchy may not be sufficiently flexible to cater for a single facility that may serve the entire county (or even Herefordshire in the case of MSW and the Joint MSW PFI contract), although the identification of the Central Technology Belt encompassing the top three hierarchical locations is a clear pointer as to where such a facility is likely to be located.	Noted and agreed.
PR52-1679	Martin Pollard/Nick Roberts, <i>Axis on Behalf of Mercia Waste Management (MWM)</i>	4. In so far as MSW is concerned, in light of this waste stream being collected by road and the current location of waste transfer infrastructure (which is not rail / water linked), it should be acknowledged that sites with rail or water connections are unlikely to be an important influencing factor.	Noted. We are currently working on this issue. We intend to explore issues of future road capacity and possibilities for the use of water and rail in identifying broad areas for waste management.
PR52-1679	Martin Pollard/Nick Roberts, <i>Axis on Behalf of Mercia Waste Management (MWM)</i>	5. With regard to Green Belt the Waste Core Strategy should differentiate between open land in the Green Belt and Major Developed Sites in the Green Belt, particularly in light of the Estech consent at Hartlebury Trading Estate and the clear potential that this Major Developed Sites in the Green Belt offer.	We intend to comply with national policy regarding the use of green belt, which limits the kind of uses that will be permitted. We would expect any applications for facilities on such sites to demonstrate the "very special circumstances" which would justify their development.

Reference	Name/Organisation	Summary of comments	Initial officer response
PR52-1679	Martin Pollard/Nick Roberts, <i>Axis on Behalf of Mercia Waste Management (MWM)</i>	6. MWM has reviewed the Industrial Estates Study paper and in particular the sites in Table 2.1 and on page 5. Work carried out by MWM indicates that these sites may offer potential for some small to medium scale MSW treatment facilities but for larger strategic facilities (as highlighted on Page 2 of the EPO document in respect of the thermal treatment options), all bar Hartlebury Trading Estate are either unsuitable or do not have a suitably sized site (2.0 hectares or greater). With the exception of the points made within MWM's representations the company supports the overall approach advocated in the EPO document and associated background paper.	Noted.
NQ25-672	A Brodrick, <i>White Ladies Aston Parish Meeting</i>	Good transport connections are vital and we trust that the need to protect the environment will ensure that open ground and greenbelt will not automatically be proposed. We endorse the need to make use of previous or existing industrial land.	Noted and agreed.
NQ29-1162	Cat Ainsworth, <i>Worcestershire Partnership Climate Change Theme Group</i>	The Group appreciates the emphasis that is placed on the minimisation of 'waste miles' (page 37).	Support noted.
NQ31-682	Louise Brockett, <i>Redditch Borough Council</i>	Following the release of the Panel Report to the West Midlands Regional Spatial Strategy (WMRSS) Phase Two Revision Redditch will not be designated as a Settlement of Significant Development; this is referred to on page 30 and 38 and will need to be amended.	Noted and agreed.
NQ31-682	Louise Brockett,	The Waste Core Strategy (p31) refers to Redditch	Noted and agreed.

Reference	Name/Organisation	Summary of comments	Initial officer response
	<i>Redditch Borough Council</i>	delivering 17.7% of new employment as a result the figures in the RSS. The Panel Report to the WMRSS has altered the timeframe in which the delivery of employment land covers and therefore this figure will need to be amended in line with this recommendation.	
NQ31-682	Louise Brockett, <i>Redditch Borough Council</i>	Reference is made to Policy SR3C within the WMRSS Phase Two Revision, this policy has been altered as a result of the Panel Report, and therefore this recommendation will need to be taken into account.	Noted and agreed.
OQ6-1666 OQ7-1444	Mrs E Morgan Mr P Morgan	As above - far more effort needs to be made to make more local recycling and waste management facilities near to the points of origin.	Agreed that wastes should be managed as close as possible to the source of their arisings. We do, however, have to recognise that there are economies of scale for some facilities.
OQ9-1626	Mr M Wedd, <i>Lower Broadheath Parish Council</i>	The totals should be re looked at every 5 years so that forward plans may be adjusted as required by events not predictions born in the middle of a recession.	Agreed. We propose to monitor the Waste Core Strategy annually and review it as necessary.
OQ10-1503	Mr B Jordan	It seems that waste arisings and handling facilities are already mismatched, although it seems that this is somewhat obscured by the misleading documentation.	We recognise this problem. Defra is currently trying to improve the accuracy of data. We will use the best information available.
OQ11-1689	Dr A Judge	Greenbelt land is protected in district councils' local plans and by statute. It should not be used for waste management purposes unless such use is compatible with relevant local plans.	We intend to comply with national policy regarding the use of green belt, which limits the kind of uses that will be permitted. When completed the Waste Core Strategy will form part of the local development framework. This will be used alongside District and Borough Core Strategies (which will replace the old

Reference	Name/Organisation	Summary of comments	Initial officer response
			'local plan' and 'structure plan' policies) to provide the planning policies against which applications for waste management will be judged.
OQ13-1667	Mr A Murcott	Hartlebury Common is one of Worcestershire's most important nature reserves and yet Hartlebury is the proposed site for a new and very large incinerator. I would like to have more information about the research that has been done into the harmful effects of pollution from incinerators. I am not convinced that they are as harmless as your report suggests.	The Waste Core Strategy is not technology specific and does not propose an incinerator. All applications with potentially significant environmental impacts will be required to include an Environmental Impact Assessment. The Environment Agency is responsible for advising the council on the pollution implications of waste management proposals and will be consulted on both the emerging strategy and any specific proposals. Defra's advice is that there is no credible evidence of adverse health outcomes for those living near incinerators (Waste Strategy 2007, p77).
OQ15-1668	N and K Dowty	As mentioned above, green belt must be preserved and must not interfere with District Council local plans. Less capacity would be required if substantially	We intend to comply with national policy regarding the use of green belt, which limits the kind of uses that will be permitted. When completed the Waste Core Strategy will form part of the local development framework. This will be used alongside District and Borough Core Strategies (which will replace the old 'local plan' and 'structure plan' policies) to provide the planning policies against which applications for waste management will be judged. Agreed.

Reference	Name/Organisation	Summary of comments	Initial officer response
		more was recycled or composted. (letsrecyclenow.com!)	
OQ16-626	<i>Norton-juxta-Kempsey Parish Council</i>	Should be away from residential areas.	The Waste Core Strategy will include policies to manage the impact of waste management facilities on sensitive receptors such as residents.
OQ19-1671	Mr R Archard	Yes, except for the assertion that greenbelt is not to be used when the incinerator site is in the greenbelt so clearly if one must be built a non-greenbelt location is necessary.	We intend to comply with national policy regarding the use of green belt, which limits the kind of uses that will be permitted.
OQ20-1672	Mrs M and Mr L Phillips	In theory we must identify areas for waste management but every area must be seen to be doing their bit. Each area must take responsibility for their own waste and it should not be travelling as this creates higher levels of co2 which contravenes present government guidelines. We feel that Hartlebury as a small village has already done its bit with several landfills already in operation, we already have to contend with dreadful smells of methane at all times of the year. We believe that the village cannot be expected to endure the 80/100 lorries a day for the next 10 years to this new proposed site, our residents have not been considered in any of this.	Agreed that wastes should be managed as close as possible to the source of their arisings. We do, however, have to recognise that there are economies of scale for some facilities. Noted. All applications with potentially significant environmental impacts will be required to include an Environmental Impact Assessment, this would include a traffic impact assessment. The Environment Agency is responsible for advising the council on the pollution implications of waste management proposals and will be consulted on both the emerging strategy and any specific proposals.
OQ25-1675	Mr M Harvey	As set out in your Initial Consultation Document and the Wychavon District Local Plan 2006 green belt must be protected. No plant should be built to contravene these plans.	We intend to comply with national policy regarding the use of green belt, which limits the kind of uses that will be permitted. When completed the Waste Core Strategy will form part of the local development framework. This

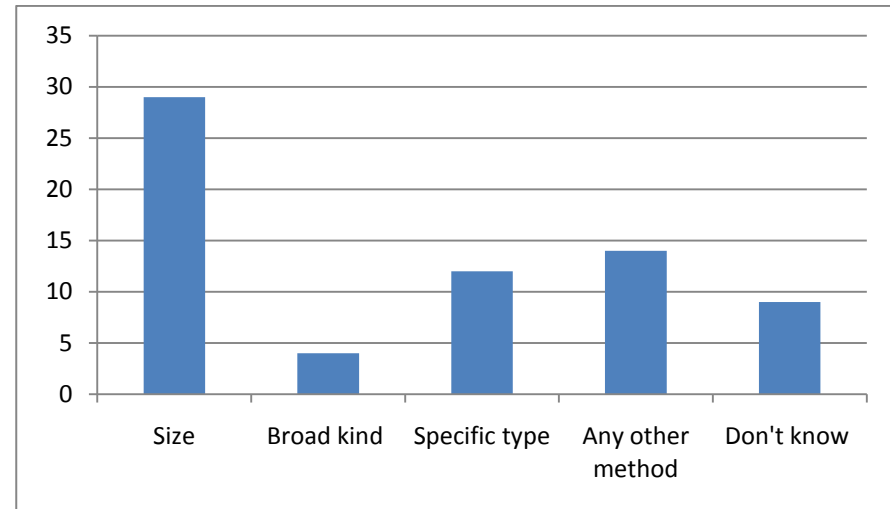
Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>However AD could be made to fit with many more sites than an incinerator,</p>	<p>will be used alongside District and Borough Core Strategies (which will replace the old 'local plan' and 'structure plan' policies) to provide the planning policies against which applications for waste management will be judged.</p> <p>AD has been considered alongside other forms of thermal treatment in the background document "<i>Recovering Energy from Waste</i>", available on our website www.worcestershire.gov.uk/wcs.</p>
OQ28-696	Deborah Klein, <i>Herefordshire Council</i>	<p>This section of the document appears to repeat national and regional policy.</p> <p>Disagree that all waste management should be located within larger urban areas and/or tucked away on 'derelict' land. Serious consideration could be given to the merits of small-scale local facilities which might be successfully located in places where larger sites could not (subject to highways/ accessibility of course). Composting and AD are particularly important in this regard, but other management types could also contribute.</p> <p>Benefits include:</p> <ul style="list-style-type: none"> • More socially acceptable • Encourage the concept of local waste management within communities • Respect economic need in rural areas and market towns 	<p>Noted.</p> <p>In developing policy proposals we will explore where different kinds of waste management facility will be acceptable. The relevant policy will make it clear that previously developed land should be used in the first instance and only where this is not possible will certain kinds of development will be permitted in the countryside and that green field proposals shall not result in significant adverse impacts on the countryside and matters of acknowledged importance. Such sites might include appropriately located composting and AD.</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
		<ul style="list-style-type: none"> • Enable emerging technology to be recognised by public opinion • Enable small investors to take advantage of govt grants and funding • Assimilate waste management into landscapes with minimal harm through good design. 	
OQ30-1684	Seskco3 (email address)	Actual capacity not detailed	Noted.

Question 4

Do you think that we should develop Preferred Options on the basis of defining what waste management facilities would be acceptable where on basis of:

	Number of Respondents	% of Total Respondents
Their size (and if so, how strategic/large or local/small facilities should be defined)	29	40.8
By broad kind (and if so, how)	4	5.6
By specific type (and if so how future technologies could be categorised)	12	16.9
Any other method (If so please specify)	14	19.7
Don't know	9	12.7



If you wish to provide details please do so.

Reference	Name/Organisation	Summary of comments	Initial officer response
PR10-1649	Mr P Vernon	(Respondent selected options a, c and d) Specific technologies will be beneficial in specific locations to preserve the proximity principle. But Incineration will not be required after the proper segregation of black bag waste.	Agreed. The reviewed Joint Municipal Waste Management Strategy proposes measures to increase the segregation of household waste, but considers that some kind of residual treatment will also be necessary.
PR6-330	David Doley, <i>Banbury Windows Ltd</i>	Close proximity principle must apply, re carbon footprint re lorry miles	Agreed that wastes should be managed as close as possible to the source of their arisings. We do, however, have to recognise that there are economies of scale for some facilities.
PR16-1216	Mr M Philpott, <i>Salford Priors Parish Council</i>	We believe that most treatment processes can be made acceptable in an industrial location given proper design and control of all emissions. The size issue is more likely to be associated with the impact of transport to and from the site.	Agreed.
NQ13-1624	<i>Wyre Forest District Council</i>	It is considered that in deciding what sorts of facilities would be located where – options should be based on a combination of the options listed (Size, kind and specific type) as all of these influence the suitability of any location.	Noted. We intend to consider these matters further and will consult District Councils accordingly.
PR21-695	David Ingleby <i>Gloucestershire County Council</i>	Acceptability will be based on a number of factors as per PPS10.	Noted and agreed.
PR23-1643	Mr P Miles	Having a centralised policy for waste management ignores the impact on the environment created by the transportation of waste across the two counties. Having one large	Agreed that wastes should be managed as close as possible to the source of their arisings. We do, however, have to recognise that there are economies of scale for some

Reference	Name/Organisation	Summary of comments	Initial officer response
		incinerator will provide no more renewable energy than a greater number of smaller ones which would have less impact on road traffic, air pollution/carbon monoxide issues, as fewer miles would be travelled to access local waste management facilities.	facilities. There is no policy to centralise waste management capacity and the Waste Core Strategy will allocate sites in a range of locations.
PR24-1645	Mrs L Brookes	Waste should be treated close to source of creation by specific technologies eg Anaerobic digestion. 5/6 plants could be developed for the cost of a huge inefficient incinerator. This would fit with the proximity principal. Ref: Vision and objective points 1,4,5 and 6	Agreed that wastes should be managed as close as possible to the source of their arisings. We do, however, have to recognise that there are economies of scale for some facilities. We intend to consider how a range of sizes of facility could be planned for.
PR25-681 PR49-1623	Ivor Pumfrey, <i>Malvern Hills District Council</i> & Andrew Ford, <i>Wychavon District Council</i>	We agree that options based on size is the most practical means of categorising sites between those of strategic importance and satisfying local need. However we have concerns about the blanket proposal to designate sites on a tonnage throughput of 50,000 tonnes per annum. We feel that there are different considerations for different types of facility which are strategic. For example the proposed tonnage would capture the thermal treatment plant proposed in the JMWMS as this has a 250,000 tonne per annum capacity whilst the composting plant would not as this has only a capacity of 25,000 tonnes per annum. Both are however of essential importance in delivering the JMWMS and with this in mind we strongly support need for flexibility set out on page 39.	Noted, change to be made. The Council will make a more detailed assessment of existing sites in the county based on the information presented in the background document <i>Waste Sites</i> and national research papers, revise the figures and consult District Councils accordingly.
PR25-681	Ivor Pumfrey, <i>Malvern Hills District Council</i> &	We welcome the recognition in the consultation strategy of the need to address Climate Change.	Noted and agreed.

Reference	Name/Organisation	Summary of comments	Initial officer response
PR49-1623	Andrew Ford, <i>Wychavon District Council</i>	However, given experiences across South Worcestershire over recent years due to flooding, it is suggested that the strategy and policies for the location of waste facilities should have regard to the resilience of the strategic communications network, particularly in times of flood.	
PR25-681 PR49-1623	Ivor Pumfrey, <i>Malvern Hills District Council</i> & Andrew Ford, <i>Wychavon District Council</i>	It is noted (page 41) that it is intended to develop a key Diagram, which shows broad locations, on a map base, where new waste facilities will be permitted. At this stage we reserve our position on the suitability of this approach. Whilst a key diagram may be a suitable way of identifying broad locations, the use of a map base could be interpreted, by some, as representing a degree of specificity which would be inappropriate.	Noted. We will consult District Councils on this. It is likely that any key diagram will be diagrammatic in order to avoid any such interpretation.
PR25-681 PR49-1623	Ivor Pumfrey, <i>Malvern Hills District Council</i> & Andrew Ford, <i>Wychavon District Council</i>	We welcome and support the recognition of the need to protect AONBs. However, these areas are to a significant degree protected by other policies.	Noted and agreed.
PR26-1653	Mr A and Mrs H Jones	Waste and recycling needs to be dealt with local to its source.	Agreed that wastes should be managed as close as possible to the source of their arisings. We do, however, have to recognise that there are economies of scale for some facilities.
PR27-1652	Mr TJ Harrop	The aim should be to maximise the level of recycling after first reducing the total waste at source. Incineration should not be included in the technology adopted - There are many existing and emerging preferred options	Agreed. The Waste Core Strategy will not be technology specific but will need to include policies to manage existing and future

Reference	Name/Organisation	Summary of comments	Initial officer response
			technologies.
PR28-1651	Mr P Spalton	I firmly believe that small local facilities will give us the flexibility for the future to reduce the environmental impact of transporting materials and allow us to exploit local variables.	Agreed that wastes should be managed as close as possible to the source of their arisings. We do, however, have to recognise that there are economies of scale for some facilities.
PR29-1650	Mr S Tranter	Smaller sites would be better suited in areas throughout the Herefordshire and Worcestershire Area. This would save on excessive transportation i.e. reduce this CO2 Footprint.	Agreed that wastes should be managed as close as possible to the source of their arisings. We do, however, have to recognise that there are economies of scale for some facilities.
PR30-1649	Mr and Mrs C Jones	LOCAL MORE APPROPRIATE FACILITIES	See above.
PR31-Anon	Anonymous	Anywhere but Hartlebury.	Noted.
PR32-1648	Mrs G Sanderson	The Greenbelt should be protected - anything but incineration.	We intend to comply with national policy regarding the use of green belt, which limits the kind of uses that will be permitted. The Waste Core Strategy will not be technology specific but will need to include policies to manage existing and future technologies.
PR33-1654	Mr RE Price	Any facilities should be provided for the locality to which they serve based on the proximity principle. Incineration is not needed if the waste is managed properly. Any facilities should be of a size and nature commensurate with the area in which they are situated and comply with the local plan/County Structure Plan.	Agreed that wastes should be managed as close as possible to the source of their arisings. We do, however, have to recognise that there are economies of scale for some facilities. When completed the Waste Core Strategy will form part of the local development framework. This will be used alongside District and Borough Core Strategies (which will replace the old 'local plan' and 'structure plan' policies) to provide the planning policies against which applications for waste management will be

Reference	Name/Organisation	Summary of comments	Initial officer response
			judged.
PR35-569	Mrs S Clift, <i>Elmbridge Parish Council</i>	More, smaller facilities would result in less opposition from residents and probably be more environmentally acceptable.	Noted.
PR36-1655	Mrs LM Bryan	Large centralised facilities will not be in accordance with the strategy's aim to be flexible to reduce traffic	Agreed that wastes should be managed as close as possible to the source of their arisings. We do, however, have to recognise that there are economies of scale for some facilities.
PR37-1656	Mr C Rogers	Special technology can be used locally. There should be no need to deal with waste on an industrial scale after proper and full recycling.	Agreed that wastes should be managed as close as possible to the source of their arisings. We do, however, have to recognise that there are economies of scale for some facilities. It is regional planning policy that some provision must be made to manage residual wastes.
PR39-1657	Tom Beard, <i>Ecohomonic Solutions ltd, Heartfood, Worcester Greenpeace, Transition Foods</i>	Education and AD outline as the best combination to inform and challenge public behaviour on discarding. It is essential the reason why is made clear to them. AD biomethane produces electricity to power vehicles. Polyethene packaging for food is that is made from crops is likely to increase in the future so nearly all food waste could be reclaimed.	Waste minimisation is one of our primary objectives. The Waste Core Strategy will remain flexible to manage emerging technologies.
PR41-1658 PR44-1680	Mr Meredith & Mr R Meredith	Recycle-reuse correct sorting of waste.	Noted. The Waste Core Strategy will be based on the principle of moving waste up the waste hierarchy, which favours reuse and recycling over disposal. This is included as Objective 4.
PR42-1659	Mrs L Meredith	If waste is sorted properly there is no need for incineration.	See above. The reviewed Joint Municipal Waste Management Strategy proposes

Reference	Name/Organisation	Summary of comments	Initial officer response
			measures to increase the segregation of household waste, but considers that some kind of residual treatment will also be necessary.
PR43-639	Dr I Fertin, <i>Far Forest Councillor</i>	Depends on technology and the size	Noted.
PR45-1661	S Cook	Facilities should be developed taking all of the above into consideration.	Noted.
PR50-1220	Mrs D Mitchell, <i>Studley Parish Council</i>	B – This will allow for technology development and not too restricted and as close to settlements as possible and within government guidelines.	Noted.
PR52-1679	Martin Pollard/Nick Roberts, <i>Axis on Behalf of Mercia Waste Management (MWM)</i>	MWM makes the following comments: 1. MWM supports objective WO6 (set out on Page 37 of the EPO document); 2. MWM supports the proposed definition of what future waste management facilities would be acceptable on the basis of size (although the concept of size appears to be more related to significance in the EPO document). The company does not support the use of the ‘Broad Type’ or ‘Specific Type’ concepts.	Support noted. Noted.
OQ2-132	Mr R Reames, <i>E.ON Energy-from-Waste (UK) Limited</i>	(E) Consider an "out-of-county" option	Noted. In line with the West Midlands Regional Spatial Strategy panel report the Waste Core Strategy will be based upon the concept of 'equivalent self-sufficiency'.
OQ3-830	Mr P Robinson	(C) I think preferred options should always use the starting point of how much of this waste can be recycled or re-used and what methods are we employing to meet these aims, then how can	Noted. The Waste Core Strategy will be based on the principle of moving waste up the waste hierarchy, which favours reuse and recycling over disposal. This is included as

Reference	Name/Organisation	Summary of comments	Initial officer response
		energy be produced from this waste.	Objective 4.
OQ4-601	TC Ward <i>Kempsey Parish Council</i>	(E) Until the requirements arising from the expansion of Worcester are determined, it is difficult to answer this question. It is not clear how far the Waste Core Strategy and the SWJCS are being developed in tandem.	The Waste Core Strategy will be developed in consultation with the District Councils and will be monitored annually and reviewed as necessary, allowing for this to be taken into account.
OQ6-1666	Mrs E Morgan	(A) On the basis that the large scale facilities are more contentious and less environmentally damaging than smaller, local ones, this is the reason for my choice	Noted.
OQ7-1444	Mr P Morgan	(A) This is a stupid question because the choices are often made on a combination of factors. On the basis that the large scale facilities are more contentious and less environmentally damaging than smaller, local ones, this is the reason for my choice.	Noted.
OQ11-1689	Dr A Judge	(D) Different technologies will be appropriate depending on the location and in order to preserve the principle that waste is dealt with in close proximity to the communities where it is produced. My overriding concern is that incineration is ruled out as a candidate technology. Separation of MSW will remove the need for incineration.	Agreed. The Waste Core Strategy will remain flexible to manage different technologies. We agree that wastes should be managed as close as possible to the source of their arisings. We do, however, have to recognise that there are economies of scale for some facilities. The reviewed Joint Municipal Waste Management Strategy proposes measures to increase the segregation of household waste, but considers that some kind of residual treatment will also be necessary.

Reference	Name/Organisation	Summary of comments	Initial officer response
OQ12-1280	<p>Christine Hemming, <i>British Waterways</i></p> <p><i>(Edited comments, full comments will be considered in the background documents "Inland Waterways" and "Waste Freight by Rail".)</i></p>	<p>BW would promote the acceptability of waste management facilities on general planning grounds and the environmental sustainability of the site. Waterborne transport (of passengers and in particular freight) has a role to play in reducing traffic congestion and providing alternative non-car modes of transport improving air quality. It has the lowest carbon emissions of all forms of transport. It has also been demonstrated to be convenient and cost effective in certain circumstances. The LDF should therefore give recognition to the role of the waterways and their towpaths for reducing traffic congestion, improving air quality and providing alternative non-car modes of transport through waterborne transport.</p> <p>British Waterways also encourages waterside sites to utilise their location for waterborne transport, subject to impact on navigation and amenity etc. Waterborne transport also has a role to play in reducing traffic congestion and improving air quality.</p> <p>The construction cycle for waterside development could potentially be serviced from the canal. Construction waste can be removed by water and building materials and plant can be delivered by water. During occupation there may also be an opportunities for domestic and commercial waste and recyclables to be transported from waterside sites to a Waste Transfer Station by water.</p>	<p>Noted. We are currently exploring the issues of transportation by water and rail in the background document "<i>Inland Waterways</i>" and "<i>Waste Freight by Rail</i>" and the comments received from British Waterways will be considered fully in those documents.</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>Given the national and regional support for water freight this is considered weak and the Core strategy should be sure to make reference to national policy and guidance with regard to promoting water transport.</p> <p>Waterborne transport of freight is particularly suitable for transporting demolition and construction waste, construction materials, household and commercial waste, recyclates and other low value, bulky, non time sensitive goods and products.</p> <p>The LDF should therefore give recognition to the role of the waterways and their towpaths for reducing traffic congestion, improving air quality and providing alternative non-car modes of transport through waterborne transport.</p>	
OQ13-1667	Mr A Murcott	<p>Our decision to burn most of the waste seems to contradict your own objectives especially WO1, WO5 (the proposed incinerator in Hartlebury will not be near to the people producing most of the waste but on the doorstep of a small community) and</p> <p>WO6 because the waste will have to be transported to the site of the incinerator from all over the county and the hazardous waste product</p>	<p>There is no decision to burn waste and the Waste Core Strategy does not propose an incinerator at Hartlebury. The reviewed Joint Municipal Waste Management Strategy identifies the need for residual waste treatment, which could be thermal treatment. The Waste Core Strategy will set a framework to assess any proposals which might be made.</p> <p>Agreed that wastes should be managed as close as possible to the source of their arisings. We do, however, have to recognise</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
		will have to be transported elsewhere.	that there are economies of scale for some facilities. It is regional planning policy that some provision must be made to manage residual wastes. Transportation by water and rail is being considered in the background documents " <i>Inland Waterways</i> " and " <i>Waste Freight by Rail</i> ".
OQ15-1668	N and K Dowty	(A) Should also be defined by specific type, effect on surrounding population and wildlife, carbon foot print produced.	We will explore how facilities can be categorised by broad types. We are developing policies to consider effects on population and wildlife. It is not possible to identify the carbon footprints of broad types of technology but we will develop policy WCS1 to encourage Sustainable Development.
OQ19-1671	Mr R Archard	(D) Surely a combination of these strategies is required; adherence to only one will cause all sorts of anomalies.	Noted. We are exploring these issues and in the first instance will be consulting District Councils.
OQ22-1081	Steven Bloomfield, <i>Worcestershire Wildlife Trust</i>	(D) We consider that a combination of a) and b) would offer the best solution, with site size dictated by tonnage. Broad kind will offer guidance as to likely environmental impacts, transport effects etc.	Noted.
OQ23-1673	T Jauncey	(D) Should be designed on a local level where appropriate. Industrial waste for example should be disposed of near to source and therefore the various options you propose should relate to the type of waste generated locally. All should be specific to local needs.	Agreed that wastes should be managed as close as possible to the source of their arisings. We do, however, have to recognise that there are economies of scale for some facilities.
OQ24-1674	Mr P Townley	(D) Waste Management Facilities could be defined by a combination of their SIZE and their PURPOSE. This would show whether they are	Noted. We are exploring these issues and in the first instance will be consulting District Councils.

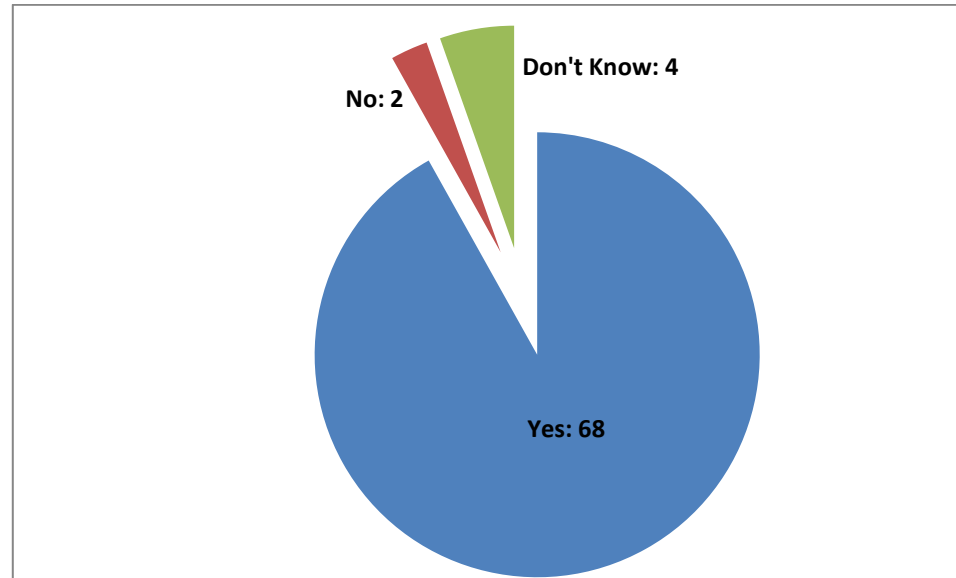
Reference	Name/Organisation	Summary of comments	Initial officer response
		intended to be strategic or local and so on. This would also show where they fit into the overall waste management process without restricting the choices of technology.	
OQ25-1675	Mr M Harvey	(A) I would say both technologies and size. The proximity principle would mean smaller facilities nearer to where the waste is produced. If we go down the route of a large incinerator we will be stuck with old technology for 25 years or more.	Agreed that wastes should be managed as close as possible to the source of their arisings. We do, however, have to recognise that there are economies of scale for some facilities.
OQ26-1676	Mr P Holden	(A) But see my later comments about Incineration at Hartlebury in this context.	Noted.
OQ28-696	Deborah Klein, <i>Herefordshire Council</i>	<p>(D) 'Strategic' is not a term exclusively dependent on size; it depends on the role of a site in the bigger picture.</p> <p>The Spatial Hierarchy (WCS2) appears simplistic in listing the largest to the smallest settlement areas in that order of priority. Waste treatment requirements may fit this nominally, but the policy should not exclude other solutions.</p> <p>Options based on size, kind or specific type run the risk of being over-restrictive or to stifle innovation. Proximity is only one aspect - a small specialist facility might not be sited close to all arisings but could be an important strategic solution over a wide area. To gain approval, proposals must be capable of compliance with Environmental Permitting, so specifying size/type should not be necessary. There could however be broad guidance on size/scale for different</p>	<p>Agreed, we are reconsidering this concept.</p> <p>The spatial hierarchy is based on regional policy. In developing the approach patterns of waste arisings were taken into account.</p> <p>Alternatives will be developed regarding the distribution of areas of land rather than restricting technology types.</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>areas or site types.</p> <p>Note: the reference to 'Lypett Grange' (page 50) should read 'Lyppard Grange'</p>	Noted, change to be made.
OQ29-164	Mary Tappenden, <i>Biffa Waste Services Limited</i>	(A) The plan should identify specific sites and leave the choice of technology to industry.	Agreed.
OQ30-1684	Seskco3 (email address)	(C) Technology advances need to be taken into account.	Agreed. The Waste Core Strategy will not be technology specific.

Question 5

Do you think that it would be useful to develop Preferred Options which include policies to address the following:

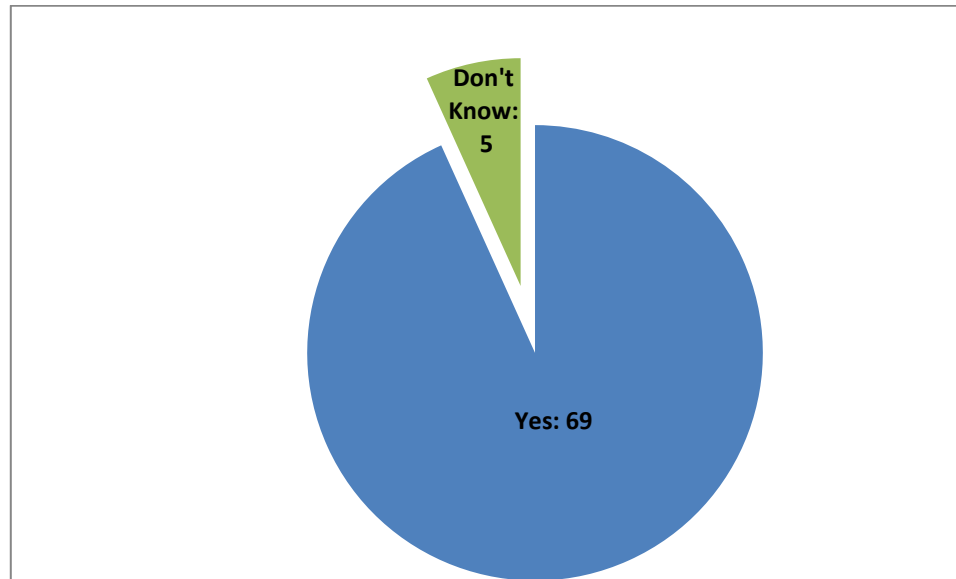
The Restoration and After-care of Waste Sites



If no, please could you explain why and suggest alternatives.

Reference	Name/Organisation	Summary of comments	Initial officer response
PR16-1216	Mr M Philpott, <i>Salford Priors Parish Council</i>	We support the proposal to extend the aftercare period for restoring old mineral workings until a satisfactory outcome is produced.	Support noted.
PR34-1625	Katie Limm, <i>Belbroughton Parish Council</i>	Adequate monitoring arrangements and arrangements for aftercare and restoration of sites should be an integral part of the strategy - so too should be a commitment to provide the necessary resources to follow these through.	Agreed, monitoring proposals will be an integral part of the strategy. The Council already monitors mineral and waste sites on a regular basis. A copy of the Planning Enforcement Policy is available on our website at http://www.worcestershire.gov.uk/cms/environment-and-planning/development-control/monitoring-enforcement.aspx .
NQ29-1162	Cat Ainsworth, <i>Worcestershire Partnership Climate Change Theme Group</i>	The emphasis placed on biodiversity gain is appreciated, but a flexible approach must be taken that leads to the creation of diverse habitats.	Noted and agreed. The possibility of a Supplementary Planning Document to do so is currently under discussion.

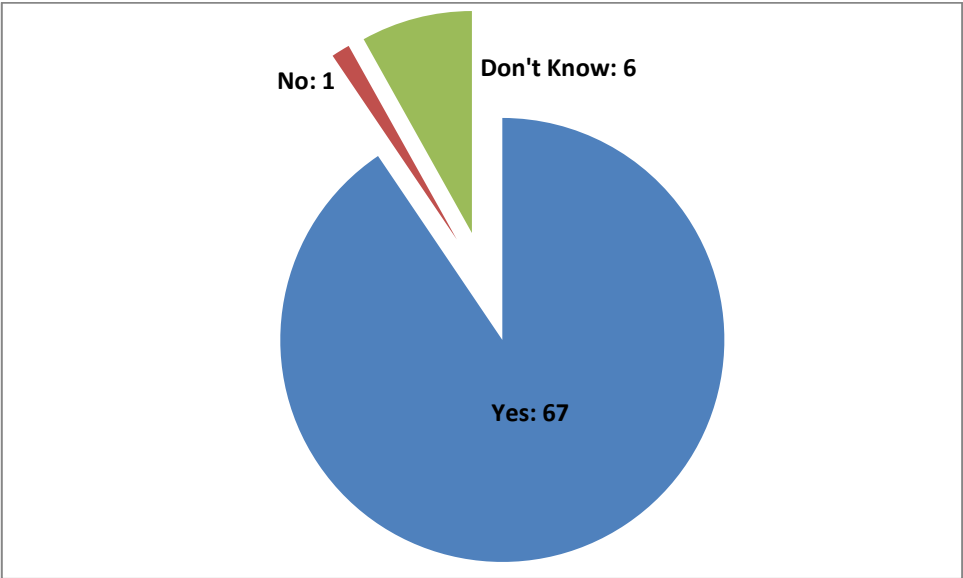
Control of Landfill Mining



If no, please could you explain why and suggest alternatives.

Reference	Name/Organisation	Summary of comments	Initial officer response
PR16-1216	Mr M Philpott, <i>Salford Priors Parish Council</i>	We oppose any proposals for landfill mining. Local residents will have already had their 'share' of upheaval and nuisance and should not be subjected to more distress.	Noted. The Waste Core Strategy will not actively encourage landfill mining but the policies will be developed to be able to assess any proposals which come forward.
NQ16-719	Hilary Berry, <i>Environment Agency</i>	With regard to: "Control of Landfill Mining:" – the WPA should consult the Environment Agency at an early stage before the undertaking of any such proposals, in order to ensure that any relevant authorisations have been applied for and that there are measures in place to safeguard potential impacts to land, air and water.	Noted, see above.
PR32-1648	Mrs G Sanderson	Landfill Mining: "If landfill is to be incinerated I would object"	Noted.
PR39-1657	Tom Beard, <i>Ecohomonic Solutions Ltd, Heartfood, Worcester Greenpeace, Transition Foods</i>	Landfill sites are obviously a must but they should also take into consideration future mining opportunities.	Noted. The Waste Core Strategy will not actively encourage landfill mining but the policies will be developed to be able to assess any proposals which come forward.
NQ29-1162	Cat Ainsworth, <i>Worcestershire Partnership Climate Change Theme Group</i>	Landfill mining should be discouraged. The risks to the environment and to health are likely to be high. At the moment, the risks would appear to outweigh any economic gain. Landfill mining would also have to take account the habitats that have developed on old landfills. These are likely to be sites rich in biodiversity (page 51; Q5).	Noted. The Waste Core Strategy will not actively encourage landfill mining but the policies will be developed to be able to assess any proposals which come forward.

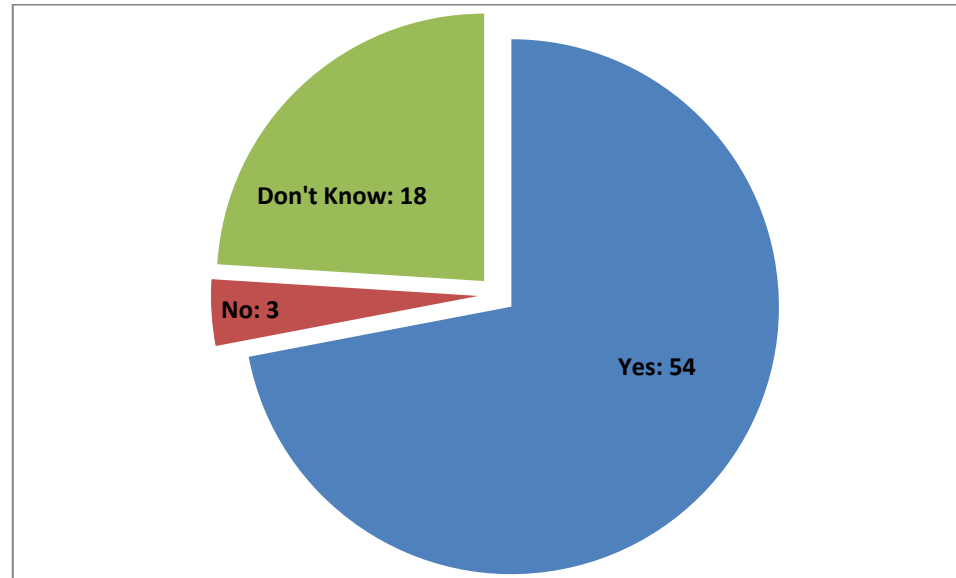
Control of "landscaping" and "noise mounds"



If no, please could you explain why and suggest alternatives.

Reference	Name/Organisation	Summary of comments	Initial officer response
NQ16-719	Hilary Berry, <i>Environment Agency</i>	The council's position on the control of landscaping and noise bunds is supported. Please note however that the construction of soil bunds as landscaping features is also a waste management activity that might require an environmental permit or relevant exemption.	Noted. The Environment Agency will be consulted on any such applications.
PR39-1657	Tom Beard, <i>Ecohonomic Solutions Ltd, Heartfood, Worcester Greenpeace, Transition Foods</i>	Landscape and noise depends upon the greater good of the site selected. For instance there are many farmers due to be retiring soon (given their average of 60) many have no one to take on the farm so a change of use to a waste facility site could be more beneficial despite landscape and noise concerns.	Noted. The relevant policies will propose that certain activities may be appropriate in rural areas. All such proposals will also need to be assessed against all other relevant policies.
PR46-1685	M R Jones	We are in direct view of a landfill site at the moment so why would this change anything?	Noted. The intention of the policy is to ensure that all future proposals are assessed against appropriate modern criteria.
NQ29-1162	Cat Ainsworth, <i>Worcestershire Partnership Climate Change Theme Group</i>	This is an interesting issue. Any policy needs to be based on local circumstances, but combined with an overall strategy that minimises the transportation of bulky materials (page 52 and question 5). This issue needs to be addressed in relation to the emphasis placed in the core strategy on carbon reduction. The planning system needs to explore this matter and must balance an overall reduction in CO2 emissions with the requirements of particular plots and landscapes.	Agreed that wastes should be managed as close as possible to the source of their arisings. However, we do have to recognise that there are economies of scale for some facilities. The Waste Core Strategy will include policies to encourage development of both Waste Transfer Stations and sites to recycle construction and demolition waste in order to minimise the volumes landfilled and the distances travelled. The benefits of Waste Transfer Stations in reducing waste miles are explored in the background document " <i>Waste Transfer Stations</i> ".

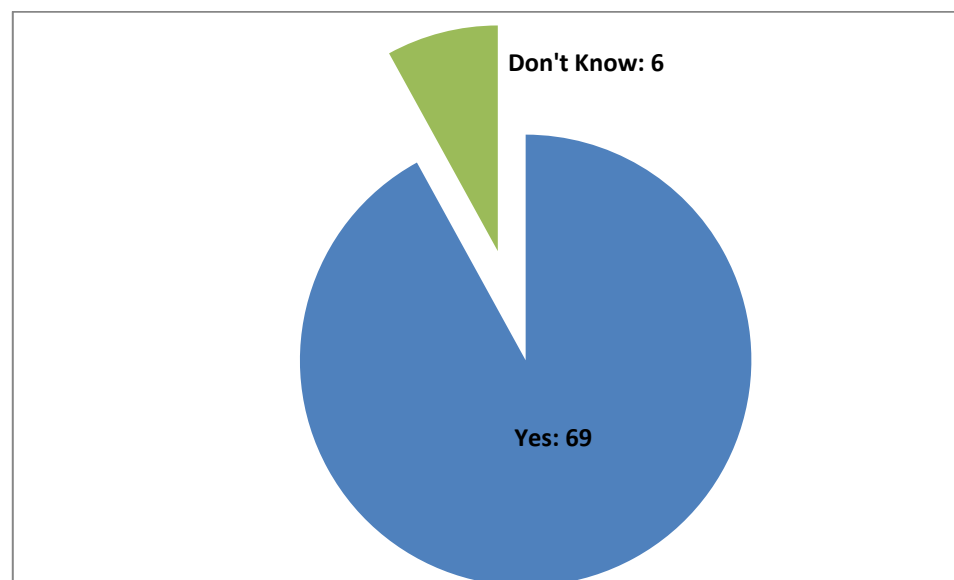
Description of what Councils in Worcestershire should require in connection with waste deposited under Permitted Development Rights



If no, please could you explain why and suggest alternatives.

Reference	Name/Organisation	Summary of comments	Initial officer response
NQ16-719	Hilary Berry, <i>Environment Agency</i>	We encourage the council to adopt a county-wide approach to waste deposits under PD rights. These activities need to be captured and controlled and requesting that developers pre-notify the WPA is a good starting point. Any such development should also be notified to the Environment Agency at an early stage in order to determine whether the activity requires an environmental permit or relevant exemption.	Support noted. Consultation will be undertaken with the district councils to see whether this policy can be developed.
PR25-681 PR49-1623	Ivor Pumfrey, <i>Malvern Hills District Council</i> & Andrew Ford, <i>Wychavon District Council</i>	Whilst supporting the consistency that will arise from the prescription of requirements in connection with waste deposited under Permitted Development Rights, this should not become an impediment to fulfilling local needs.	Noted and agreed.
PR50-1220	Mrs D Mitchell	Don't know as the summary tells of prescription and the question asks for description. We should prefer prescription.	Noted. Terminology will be reassessed.

Clarification of a County-wide approach to Local Recyclable Collection Points



If no, please could you explain why and suggest alternatives.

Reference	Name/Organisation	Summary of comments	Initial officer response
PR16-1216	Mr M Philpott, <i>Salford Priors Parish Council</i>	As regards local recyclable collection points these should be made available also to commercial users.	Agreed in principle but this would be subject to commercial agreement.
NQ16-719	Hilary Berry, <i>Environment Agency</i>	With respect to county-wide local recyclable collection points (p53) – the council should make it clear that such collection points should also comply with the relevant requirements under the Environmental Permitting Regulations 2007.	Noted and agreed.

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>The council should encourage such sites to be comprehensive in the types of recyclable waste that are available to be collected at the sites and that these sites are adequately sized with respect to the communities that they are to be serving.</p> <p>Many of these facilities are located in car parks which due to their less vulnerable use are often located in flood plains. From our experience, these can cause problems especially if they are the type of bin/skip that can float or the contents can become loose causing pollution problems and exacerbating flood risk down stream. It would be good practice if these sites could be located outside floodplains. Where they are needed in floodplains they should not be located near flood defences, culverts or structures where they may cause a problem. Also the design should be such that they do not wash away or pollute water.</p>	<p>Agreed in principle but this would be subject to commercial agreement.</p> <p>Noted and agreed. Policies will be developed to take into account flood risk.</p>
<p>PR25-681 PR49-1623</p>	<p>Ivor Pumfrey, <i>Malvern Hills District Council</i> & Andrew Ford, <i>Wychavon District Council</i></p>	<p>Support for clarification of a county-wide approach to local recyclable collection points is subject to this not resulting in any reduction the number of these much needed, essential facilities.</p>	<p>Noted and agreed.</p>

General Comments on Question 5

Reference	Name/Organisation	Summary of comments	Initial officer response
NQ13-1624	<i>Wyre Forest District Council</i>	<p>It is considered that a policy steer on these matters would be a useful addition to the Strategy. A County-wide approach to these issues would ensure consistency throughout Worcestershire.</p> <p>More detail on the requirements for what Councils in Worcestershire should require for waste deposited under PD rights and the approach to Local Recyclable Collection Points would be required before a full comment could be made. This will need to be considered in consultation with all of the Districts in Worcestershire to ensure that any policy is appropriate and useable.</p>	<p>Support noted.</p> <p>Proposals will be developed to explore this further in connection with both the Environment Agency and District Councils.</p>
PR21-695	<i>David Ingleby Gloucestershire County Council</i>	It may be that these policies may be more appropriate in a Development Control Policies DPD but it depends on how detailed the Worcestershire WCS will be in negotiation with the government office.	Noted, at present the council does not intend to produce a separate Development Control DPD.
PR48-1622	<i>Lindsay Wood, Worcester City Council</i>	p.36 'Man-agement' needs to be all one word	Noted, change will be made.
PR52-1679	<i>Martin Pollard/Nick Roberts, Axis on Behalf of Mercia Waste Management (MWM)</i>	MWM supports the EPO in respect of Q5, but note that the WPA should not issue planning permissions with General Permitted Development Order (GPDO) rights withdrawn unless there is an essential reason for doing so.	Noted and agreed.
NQ23-818	<i>Miss V Kendrick, CPRE</i>	Support all 5 topic areas.	Support noted.

Reference	Name/Organisation	Summary of comments	Initial officer response
	<i>Redditch Group</i>		
NQ25-672	A Brodrick, <i>White Ladies Aston Parish Meeting</i>	We agree with the list.	Support noted.
NQ31-682	Louise Brockett, <i>Redditch Borough Council</i>	Officers consider that it would be helpful to develop Preferred Options that include policies addressing all of the detailed issues.	Support noted.
OQ12-1280	Christine Hemming, <i>British Waterways</i> <i>(Edited comments, full comments will be considered in the background documents "Inland Waterways" and "Waste Freight by Rail".)</i>	<p>'Waterways for Tomorrow' (DETR) sets out the Government's wish to "<i>promote the inland waterways, encouraging a modern, integrated and sustainable approach to their use. We want to protect and conserve an important part of our national heritage. At the same time, we want to maximise the opportunities the waterways offer for leisure and recreation; as a catalyst for urban and rural regeneration; for education; and for freight transport.</i>"</p> <p>BW would need to assess whether a freight proposal will be considered acceptable on a number of key issues. These issues could be used to inform the policy documents as part of a sustainability agenda. Our considerations are listed below:</p> <p>1. Size of boats: Boat dimensions for particular stretches for particular stretches can be obtained from BW.</p> <p>2. Speed: recommended speed is 4 miles per hour on canals and 8 miles per hour on rivers. Where there are locks the journey time can be considerably slower. Freight</p>	Noted. We are currently exploring the issues of transportation by water and rail in the background document " <i>Inland Waterways</i> " and " <i>Waste Freight by Rail</i> " and the comments received from British Waterways will be considered fully in those documents.

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>craft may not be given priority over leisure craft. Currently a frequency of more than 4 boats an hour would normally be unacceptable.</p> <p>3. Health and Safety: The types of goods and materials transported on the waterways and the methods in which goods and materials are transported will be restricted. As a general rule British Waterways will not permit the transfer of Hazardous or Special wastes & materials by water. In addition all boats must be designed to exclude the risk of materials entering / falling into the watercourse.</p> <p>4. Times of Travel: Hours of operation will be restricted due to the use of the waterways by leisure craft, residential boaters and the urban and rural locations of the canals.</p> <p>5. Wharfage: The loading and/or unloading of Goods will require a separate agreement between British Waterways and the Freight Operator. Appropriately sited and designed wharves will be required.</p> <p>6. Damage to the navigation: The licence terms make the operator liable to repair damage to the canal infrastructure caused by their operations.</p> <p>7. Dredging: a dredging survey should be undertaken to ensure that the boats can actually navigate the system.</p> <p>8. Water Supply: A full study of the water requirements and current levels should be</p>	

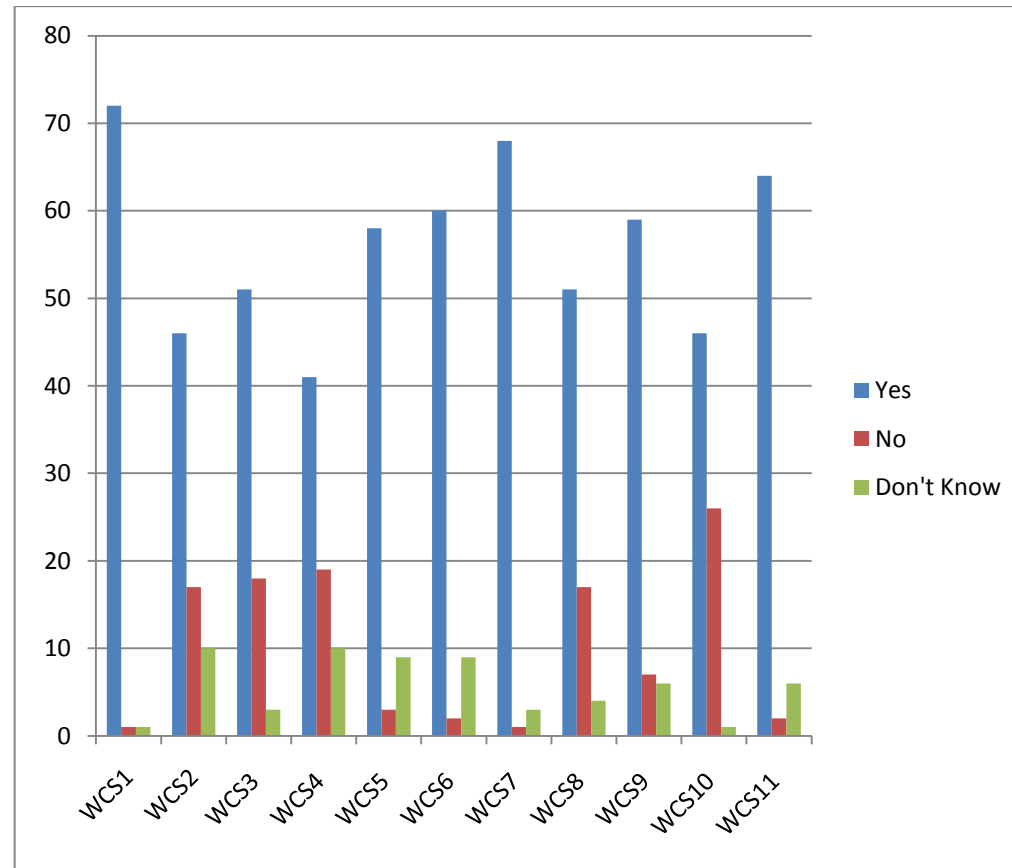
Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>undertaken to determine the impacts from a water control perspective. Many areas may not be currently suitable for freight.</p> <p>9. Stoppages: A freight operator should be aware that the availability of stretches of waterways and water levels may not always enable freight movement. British Waterways occasionally needs to drain stretches of water to carry out essential maintenance.</p> <p>10. Licence fees: There are commercial charges payable to British Waterways for the use by a commercial operation of the waterway. Contact should be made with BW who will advise as to the current charges and conditions.</p> <p>11. Particular requirements: British Waterways is receptive to commercial operators and would seek to identify requirements and how they can be facilitated and funded. Where construction will be required near to the bank it will be necessary to comply with the Code of Practice for Works affecting British Waterways for such works which will incur a supervision fee.</p> <p>12. Show stoppers: where there are Sites of Special Scientific Interest or European Directives on the protection of the environment freight would not be permitted.</p> <p>Further advice please refer to: 1. BW Carriage of Freight Conditions 2. BW Freight Dimensions</p>	

Reference	Name/Organisation	Summary of comments	Initial officer response
OQ15-1668	N and K Dowty	<p>Policies required to define waste able to be recycled and composted as new technologies are appearing all the time.</p> <p>Policy to control green belt development.</p>	<p>The Waste Core Strategy will be flexible and not technology specific and will be able to deal with new technologies as they arise.</p> <p>We intend to comply with national policy regarding the use of green belt, which limits the kind of uses that will be permitted.</p>
OQ24-1674	Mr P Townley	Should item 4 read 'Prescription' not 'Description'?	Noted. Terminology will be reassessed.
OQ28-696	Deborah Klein, <i>Herefordshire Council</i>	<p>Restoration and after-care should be part of standard landscaping requirements as for any other industrial or similar site. Modern waste management sites should be moving away from the old landfill approach where completion and restoration would be an issue. where inert landfilling/landraising is permitted, landscaping and after-care/management requirements should be routine, provided such policies are in place.</p> <p>The other 4 suggestions are reasonable in terms of good practice guidance to Districts in a two-tier authority.</p>	<p>Noted and agreed.</p> <p>Support noted.</p>
OQ30-1684	Seskco3	Wider involvement with stakeholders before any decision.	Future proposals will be developed in consultation with District Councils, the Environment Agency and other stakeholders. Individual planning applications will also be consulted on.

Question 6

Do you think that it would be useful to develop Preferred Options along the lines of the draft policies included in this document?

	Yes	No	Don't Know
WCS1 Ensuring Sustainable Development	72	1	1
WCS2 Broad Hierarchy	46	17	10
WCS3 Future Waste Site Allocations	51	18	3
WCS4 Unallocated Sites	41	19	10
WCS5 How much Waste Capacity do we need?	58	3	9
WCS6 Safeguarding	60	2	9
WCS7 Assessing the Waste Implications of New Development	68	1	3
WCS8 What kind of facilities do we need?	51	17	4
WCS9 Landfill	59	7	6
WCS10 Energy from Waste	46	26	1
WCS11 Managing the Impact of Waste Management Related Development	64	2	6



WCS1: Ensuring Sustainable Development

Reference	Name/Organisation	Summary of comments	Initial officer response
PR10-1649	Mr P Vernon	Ensure recycling and sorting of black bag waste. AD and Energy recovery from biogas.	Promotion of recycling and sorting of black-bin waste are included in the reviewed Joint Municipal Waste Management Strategy. Anaerobic digestion and energy recovery are considered in the background document "Recovering energy from waste", available on our website www.worcestershire.gov.uk/wcs .
NQ5-1639	Ann Marriot	I have read the summary of WCS. It is a very impressive document. I would like to make a suggestion, which would I am sure, involve crossing organisation boundaries. In the interest of avoiding climate change, we may all have to think and behave in new ways. In planning waste to energy facilities, consideration should be given to integrating district heating schemes.	Noted. Change to be made to include references to encouraging such schemes.
PR8-1063	Mr D Talsma, <i>GKN Corporate Centre</i>	WCS 1, 2, 6, 7, 11 are rather vague and untargetted. Preferred options are most useful when aimed at clear, discernable needs.	Noted. More specific wording will be developed following the responses to this consultation.
NQ13-1624	<i>Wyre Forest District Council</i>	Support for this approach	Support noted.
NQ16-719	Hilary Berry, <i>Environment Agency</i>	In Part 8 (the proposed policies) the document states " We think that the Strategy should focus on identifying locations where facilities can be developed rather than prescribing the technologies to be used". While this is in line with PPS10 guidance, consideration needs to be made if composting, AD or thermal treatment options are to be considered, as this will inevitably have a strong influence on which sites would be regarded as	Noted and agreed. Such consideration will be made.

Reference	Name/Organisation	Summary of comments	Initial officer response
		suitable.	
NQ16-719	Hilary Berry, <i>Environment Agency</i>	A general comment is that given the extent of floodplain in Worcestershire, we would have expected flood risk to be given greater emphasis. Reference to the need to reduce flood risk could be included by appropriate wording in policy 1, 3 and/or 4.	Agreed. Appropriate policies will be developed.
NQ16-719	Hilary Berry, <i>Environment Agency</i>	This Policy should explicitly refer to the need for Site Waste Management Plans (where applicable)	We will develop policies which set out the need to consider construction and demolition waste and will make reference to Site Waste Management Plans where relevant.
PR24-1645	Mrs L Brookes	Ensure recycling and sorting of black bag waste. Anaerobic digestion and energy recovery from biogas.	Promotion of recycling and sorting of black-bin waste are included in the reviewed Joint Municipal Waste Management Strategy. Anaerobic digestion and energy recovery are considered in the background document "Recovering energy from waste", available on our website www.worcestershire.gov.uk/wcs .
PR25-681 PR49-1623	Ivor Pumfrey, <i>Malvern Hills District Council</i> & Andrew Ford, <i>Wychavon District Council</i>	We particularly support fostering higher end uses and maximising the resource potential of waste.	Support noted.
PR25-681 PR49-1623	Ivor Pumfrey, <i>Malvern Hills District Council</i> & Andrew Ford, <i>Wychavon District Council</i>	We welcome the recognition in the consultation strategy of the need to address Climate Change. However, given experiences across South Worcestershire over recent years due to flooding, it is suggested that the strategy and policies for the location of waste facilities should have regard to the resilience of the strategic communications	Support noted. Agreed, change to be made to include adaptation.

Reference	Name/Organisation	Summary of comments	Initial officer response
		network, particularly in times of flood.	
PR25-681 PR49-1623	Ivor Pumfrey, <i>Malvern Hills District Council</i> & Andrew Ford, <i>Wychavon District Council</i>	Whilst it is accepted that considerable community benefit will derive from many waste proposals, if brought forward in accordance with the Core Strategy, it is suggested that reference should and could be made to proposals being required to contribute, where appropriate to essential physical and community infrastructure. If the recurring theme throughout the document, is taken at face value, that waste facilities can be accommodated within existing employment areas / urban areas without undue harm, there would appear to be no overriding reason to suggest why they could not be required to infrastructure requirements. Cross reference to other Core Strategies and associated implementation plans would be appropriate.	Agreed in principle. The issue will be discussed with District Councils.
PR27-1652	Mr TJ Harrop	Ensure recycling is maximised.	Agreed.
PR29-1650	Mr S Tranter	Recycling is a must, proper sorting of black bag waste, AD and recovery of biogas.	Promotion of recycling and sorting of black-bin waste are included in the reviewed Joint Municipal Waste Management Strategy. Anaerobic digestion and energy recovery are considered in the background document " <i>Recovering energy from waste</i> ", available on our website www.worcestershire.gov.uk/wcs .
PR34-1625	Katie Limm, <i>Belbroughton Parish Council</i>	The Parish Council is opposed to the use of green belt land on principle since a significant adverse impact on the countryside is inevitable.	We intend to comply with national policy regarding the use of green belt, which limits the kind of uses that will be permitted.
PR37-1656	Mr C Rogers	Recycle, Anaerobic Digestion.	Anaerobic digestion and energy recovery are considered in the background document " <i>Recovering energy from waste</i> ", available on our website www.worcestershire.gov.uk/wcs .

Reference	Name/Organisation	Summary of comments	Initial officer response
PR42-1659	Mrs L Meredith	Sort out waste from black bins properly use anaerobic digestion which would produce biogas and is sustainable.	Promotion of recycling and sorting of black-bin waste are included in the reviewed Joint Municipal Waste Management Strategy. Anaerobic digestion and energy recovery are considered in the background document " <i>Recovering energy from waste</i> ", available on our website www.worcestershire.gov.uk/wcs .
PR51-659	Mr D Rook, <i>Stourport on Severn Town Council</i>	"Contribute to, or mitigate, or will be able to adapt to the anticipated adverse effects of climate change": It is not thought that the above sub-paragraph is stated with the greatest clarity to express what is intended.	Noted. Terminology to be reassessed.
PR52-1679	Martin Pollard/Nick Roberts, <i>Axis on Behalf of Mercia Waste Management (MWM)</i>	MWM supports the policy objective and the main criteria the Council is proposing to use to assess whether waste management development is sustainable. The company would note that it is important that any criteria requiring a % of energy from renewable sources is accompanied by the current caveat "unless it can be demonstrated that this would not be feasible or viable, or the development is part of an integrated process for reducing greenhouse gas emissions or for carbon offsetting measures".	Support noted. Agreed in principle. Concept will be included.
NQ23-818	Miss V Kendrick, <i>CPRE Redditch Group</i>	Agree with protection to maintain and seek to regenerate carbon sinks - notably woodland. More trees need to be established at or near all waste sites.	Noted and agreed in principle. The Waste Core Strategy will be developed to consider this issue.
NQ23-818	Miss V Kendrick, <i>CPRE Redditch Group</i>	Agree with draft policy direction as a useful basis; under requirements, point 4 "landscaping", more detail is required at this initial stage to understand	Noted and agreed in principle. The Waste Core Strategy will be developed to consider this issue.

Reference	Name/Organisation	Summary of comments	Initial officer response
		the role of Climate Change.	
NQ25-672	A Brodrick, <i>White Ladies Aston Parish Meeting</i>	Endorse.	Support noted.
NQ30-716	Amanda Smith <i>English Heritage (West Midlands)</i>	The suggested range of criteria in support of this policy refers to determining design features as energy management, environmental performance and carbon reduction. We recommend that an additional influence on design as well as the broader sustainability basis for proposals (i.e. potential environmental impacts) should include environmental conservation and enhancement more generally.	Noted and agreed in principle. The Waste Core Strategy will be developed to consider this issue but will also refer to district core strategies to further influence design.
NQ31-682	Louise Brockett, <i>Redditch Borough Council</i>	Officers strongly support the requirement for facilities over 1000 sq m to provide 10% of their energy from alternative or renewable sources.	Support noted.
OQ4-601	TC Ward <i>Kempsey Parish Council</i>	The commitment to "make communities take responsibility for their own waste" is open-ended and does not indicate how this will be done, or its implications for District/Town and Parish councils.	Noted. The Waste Core Strategy will seek to achieve the principle of "equivalent self-sufficiency" in waste management across the county. Further consultations will be undertaken with District, Town and Parish Councils.
OQ15-1668	N and K Dowty	Energy from waste is not sustainable unless organic matter which should have been composted is burnt. Therefore this is not a renewable energy source.	Agree that energy from waste is not a renewable energy source. The Council's technical research paper on renewable energy can be seen on our website at www.worcestershire.gov.uk/planning .

WCS2: Broad Hierarchy

Reference	Name/Organisation	Summary of comments	Initial officer response
PR10-1649	Mr P Vernon	Emphasis should be on technology type.	Disagree. In accordance with national planning policy, the Waste Core Strategy will not be technology specific.
NQ8-588	Mrs J Herons, <i>Hartlebury Parish Council</i>	The individual issues raised in the strategy are complex and the Council does not feel able to respond to each question on the supplied questionnaire. We are, however, in complete agreement that waste minimisation, rather than waste disposal, must be Worcestershire's top priority. If the county can reduce the amount of waste produced and increase recycling rates this must be the way forward. We would very much like to see policies put in place for achieving this.	Support noted.
NQ9-817	Frank Hill, <i>Campaign to Protect Rural England</i>	Page 11 (summary): Achieving a Spatial Hierarchy: The objective is WO5, not WO6.	Noted, change to be made.
NQ9-817	Frank Hill, <i>Campaign to Protect Rural England</i>	Page 12 (summary): Spatial hierarchy: Redditch is no longer an SSD.	Noted, change to be made.
NQ16-719	Hilary Berry, <i>Environment Agency</i>	There is no explicit link with strategy objective WO6, which aims to reduce the transportation of waste by road if possible. The desire to locate facilities near to where waste could be transported by rail, for example, could have an influence on the spatial distribution of new waste facilities. However, the main rail links within the county connect the larger urban areas and so it is possible that the preference for such sites to be located as near as possible to the large urban areas in the county could complement strategy objective WO6.	Noted. The possibilities for movement of waste by water and rail are currently under consideration. The broad approach will be to allocate facilities close to waste arisings.

Reference	Name/Organisation	Summary of comments	Initial officer response
NQ16-719	Hilary Berry, <i>Environment Agency</i>	The policy lists Landfill/Landraise sites as examples of potential “strategic” sites. We question whether such sites should be seen as “strategic” within the context of the long-term development within the county. Such sites should essentially be seen as a last resort disposal option for wastes that have no other realistic outlet. If the right number, size and type of facilities are developed within the county this should reduce the county’s dependence on landfill as a disposal choice and as such points against apportioning strategic importance to such sites.	Noted and agreed. We are reconsidering the use of the term "strategic" as a concept.
NQ18-169	Shaun Denny, <i>Cemex</i>	Draft Policy Direction WCS2 appears to classify almost all landfill operations as Strategic facilities. This criteria is not felt by the Company to be appropriate with regard to the landfilling of inert waste where facilities can be small scale when compared to non-inert operations and serve only a sub-county level market. The Company would support a policy approach which removed small scale landfill operations from a Strategic classification. Whilst any criteria will be subjective to some extent, it is felt that any landfill site accommodating less than 50000 tonnes of imported material per annum is unlikely to serve more than a sub-county market and therefore should not be seen as Strategic.	Noted and agreed. We are reconsidering the use of the term "strategic" as a concept.
PR24-1645	Mrs L Brookes	Emphasis on technology type	Disagree. In accordance with national planning policy, the Waste Core Strategy will not be technology specific.
PR25-681	Ivor Pumfrey, <i>Malvern</i>	See response to Questions 3 and 4 above.	Noted.

Reference	Name/Organisation	Summary of comments	Initial officer response
PR49-1623	<i>Hills District Council & Andrew Ford, Wychavon District Council</i>		
PR25-681 PR49-1623	<i>Ivor Pumfrey, Malvern Hills District Council & Andrew Ford, Wychavon District Council</i>	The draft policy refers to sub-regional apportionment on the basis of RSS figures. Page 31 suggests how this might be done with respect to C & I waste and employment land requirements. However, draft policy WCS2 infers that MSW will similarly be apportioned presumably on the basis of regional housing requirements or in accordance with the settlement hierarchy in the RSS (as interpreted the Waste Core Strategy). This needs clarification.	Noted and agreed. Supporting text will be clarified.
PR25-681 PR49-1623	<i>Ivor Pumfrey, Malvern Hills District Council & Andrew Ford, Wychavon District Council</i>	It is suggested that where local facilities might reasonably be located within a major urban area, as opposed to an adjoining rural area, it may be preferable for provision to be addressed on a cross-boundary basis rather than solely having regard to provision within district boundaries.	Noted and agreed. This matter will be discussed further with District Councils.
PR25-681 PR49-1623	<i>Ivor Pumfrey, Malvern Hills District Council & Andrew Ford, Wychavon District Council</i>	The Core Strategy may wish to consider the debate into the WMRSS Phase Two review as to whether Redditch ought to be a SSD and what the implications to the spatial hierarchy would be of potential changes made by the Secretary of State and the implementation of WSC2 based upon SSD being the top of the hierarchy.	Noted, change to be made. Redditch will not be at the top of the hierarchy.
PR27-1652	Mr TJ Harrop	Ensure acceptable technological solutions are identified.	In accordance with national planning policy, the Waste Core Strategy will not be technology specific.
PR29-1650	Mr S Tranter	Should look at local sites using AD mass transit is	Agreed that wastes should be managed as

Reference	Name/Organisation	Summary of comments	Initial officer response
		not needed.	close as possible to the source of their arisings. We do, however, have to recognise that there are economies of scale for some facilities.
PR37-1656	Mr C Rogers	Technology.	Noted. In accordance with national planning policy, the Waste Core Strategy will not be technology specific.
PR38- Anon	Anonymous	Not if it means building incinerators in areas of outstanding beauty and rural designation areas.	Noted. Criteria will be developed to identify appropriate locations for different kinds of facility. Areas of Outstanding Natural Beauty and the open countryside will be protected in accordance with national policy.
PR39-1657	Tom Beard, <i>Ecohomomic Solutions ltd, Heartfood, Worcester Greenpeace, Transition Foods</i>	Don't agree with your chosen hierarchy.	Noted.
PR42-1659	Mrs L Meredith	Concentrate on technology type.	In accordance with national planning policy, the Waste Core Strategy will not be technology specific.
PR50-1220	Mrs D Mitchell	Under broad hierarchy I suggest we agree but add "but not in Warwickshire".	The Worcestershire Waste Core Strategy only relates to development in Worcestershire.
PR52-1679	Martin Pollard/Nick Roberts, <i>Axis on Behalf of Mercia Waste Management (MWM)</i>	MWM have the following comments regarding the proposed hierarchy: 1. The policy wording makes reference to a 'Central Technology Belt' that has been developed along the line of Longbridge, Bromsgrove, Droitwich, Worcester and Malvern.	Agreed, change to be made.

Reference	Name/Organisation	Summary of comments	Initial officer response
		MWM considers that this area should be identified on the key plan that will accompany the Core Strategy.	
PR52-1679	Martin Pollard/Nick Roberts, <i>Axis on Behalf of Mercia Waste Management (MWM)</i>	2. As noted by the Council on Page 31 of the Core Strategy EPO document, the hierarchy does not take into account a number of large, established industrial / employment sites that are not located within or immediately adjacent to the main towns / population centres. It is therefore difficult to see how these would fit within the hierarchy even though they may represent suitable locations for waste. It is essential that such sites are considered and included.	Agreed. Change to be made in discussion with District Councils.
PR52-1679	Martin Pollard/Nick Roberts, <i>Axis on Behalf of Mercia Waste Management (MWM)</i>	3. The hierarchy may not be sufficiently flexible to cater for a single facility that may serve the entire county (or even Herefordshire in the case of MSW and the Joint MSW PFI contract), although the identification of the Central Technology Belt encompassing the top three hierarchical locations is a clear pointer as to where such a facility is likely to be suitable.	Noted. We intend to use the hierarchy in identifying preferred areas but will also develop policies to enable all applications to be assessed.
NQ22-642	Mr Lawrence McCurrich, <i>Rushock Parish Council</i>	We consider that the methods of dealing with the waste should be based on a number of locations to keep them near to where the waste is generated. This would also significantly reduce the level of CO2 emissions to the atmosphere from lorries having to travel long distances.	Agreed that wastes should be managed as close as possible to the source of their arisings. We do, however, have to recognise that there are economies of scale for some facilities.
NQ23-818	Miss V Kendrick, <i>CPRE Redditch Group</i>	Redditch is no longer considered a Settlement of Significant Development.	Agreed, change to be made.

Reference	Name/Organisation	Summary of comments	Initial officer response
OQ11-1689	Dr A Judge	Emphasis should be on technology type, with emphasis on sustainable solutions.	Disagree. In accordance with national planning policy, the Waste Core Strategy will not be technology specific. Policies will be developed to ensure that development is sustainable.
OQ15-1668	N and K Dowty	Emphasis should be on the type of facility and its environmental impact on the surrounding communities, not just broad areas for waste.	Noted. This is a concept that will be developed in the policies.
OQ20-1672	Mrs M and Mr L Phillips	Broad hierarchy has already been addressed, but note that Herefordshire and the greater West Midlands is not mentioned in these "broad areas"	The Worcestershire Waste Core Strategy only relates to development in Worcestershire and will be based on the concept of "equivalent self-sufficiency".
OQ25-1675	Mr M Harvey	NEW technology should be the main driver and focus.	The Waste Core Strategy will be flexible to take into account changes in technology.

WCS3: Future Waste Site Allocations

Reference	Name/Organisation	Summary of comments	Initial officer response
PR10-1649 PR27-1652 PR29-1650 PR37-1656	Mr P Vernon Mr TJ Harrop Mr S Tranter Mr C Rogers	Ensure local plans are followed especially protection of greenbelt.	When completed the Waste Core Strategy will form part of the local development framework. This will be used alongside District and Borough Core Strategies (which will replace the old 'local plan' and 'structure plan' policies) to provide the planning policies against which applications for waste management will be judged. We intend to comply with national policy regarding the use of green belt, which limits the kind of uses that will be permitted.
PR42-1659	Mrs L Meredith	Must comply with local plan and avoid building on greenbelt	See above.
PR12-484	Anthony Bird, <i>The Bird Group of Companies Ltd</i>	<p>The Long Marston Site is owned by the Bird Group of Companies Ltd. The total area of the site is approximately 160 acres and it was part of the former Long Marston MOD establishment. Approximately 25%-35% has either formerly been or is currently being used for recycling and we would wish this area to be included in the WCS.</p> <p>Besides being principally used for metal recycling in the past, new plastic separation technology is being currently developed and we envisage major technical progress on this site to recover plastics from the non metallic waste from end of life vehicles which is now going to landfill in Warwickshire. There could well be opportunities</p>	<p>Noted. Policies will be developed to safeguard existing and permitted waste facilities.</p> <p>Industry will be asked to contribute towards developing broad areas for future waste management development in the Waste Core Strategy. Any sites brought forward will be considered against policy criteria.</p> <p>Noted. The Waste Core Strategy will be flexible in order to take into account changes in technology.</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
		for recycling plastics collected from household waste but this will have to be discussed with Sims Group as the technology is designed to deal with the polymers emanating from ELV and WEEE recycling. Other potential projects envisaged on this site are for the development of technology for recycling of construction waste and also for paper and board, not forgetting further developments in the recovery of ferrous, non ferrous and precious metals.	
PR6-330	David Doley, <i>Banbury Windows Ltd</i>	'Waste' reuse of materials factories/facilities need to be encouraged on designated local green business parks for (a) creation of jobs and (b) reduction of lorry miles.	Agreed in principle. The Waste Core Strategy will identify broad areas for new facilities but will not designate specific local green business parks.
PR9-Anon	Anonymous	The erstwhile Structure Plan identified "Waste" as eminently suitable for rail freight. WO6, 'Emerging Preferred Options Report' reinforces this. What joined-up thinking exists WCS3/Local Transport Plan 2001-6 p30 and 168, site-wise? (For instance, Hartlebury Trading Estate, opened 1981, failed to harness the asset of the adjacent railway - squandering the obvious land-use benefit).	The possibilities for movement of waste by water and rail are currently under consideration.
PR16-1216	Mr M Philpott, <i>Salford Priors Parish Council</i>	In respect of WCS3 and WCS5 we are concerned that insufficient capacity is being identified.	The strategy will be based on the concept of a capacity gap and there is no intention to limit the number of facilities provided subject to the concept of equivalent self-sufficiency for Worcestershire.
NQ13-1624	<i>Wyre Forest District Council</i>	The District Council wish to be involved in the consideration of sites for future waste management facilities, which will appear on the	Noted. District Councils will be consulted on the development of this policy.

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>Key Diagram. Without seeing the Key Diagram the District Council is unable to comment fully on this draft policy direction. Clarification is also required on the reference to 'broad terms', as this is fairly ambiguous at present.</p> <p>Support for demonstrating a commitment to using the most appropriate transport routes.</p>	Support noted.
NQ15-704	Eva Neale, <i>Warwickshire County Council</i>	As stated in Draft Policy Direction: WCS3: Future Waste Site Allocation the intention is to produce a key diagram outlining in broad terms where new waste management facilities will be permitted. Until this diagram is produced the transport implications of the plan can not be identified. The availability of good transport links will be a key consideration in the sifting of potential sites for new waste facilities. This point is acknowledged throughout the document on a number of occasions.	Agreed.
NQ16-719	Hilary Berry, <i>Environment Agency</i>	A general comment is that given the extent of floodplain in Worcestershire, we would have expected flood risk to be given greater emphasis. Reference to the need to reduce flood risk could be included by appropriate wording in policy 1, 3 and/or 4.	Noted and agreed. Concept will be included in the appropriate policies.
NQ16-719	Hilary Berry, <i>Environment Agency</i>	The sequential test should be used to find the lowest Flood Risk Zone available for possible future locations for new waste facilities, complying with the overarching sustainability aim and PPS 25. This is not addressed in the draft policy direction WCS3. Table D2 PPS25 Development	Noted and agreed. GOWM advice is not to repeat national and regional policy. However, we intend to explore whether specific references to flood risk can be included.

Reference	Name/Organisation	Summary of comments	Initial officer response
		and Flood Risk shows landfill and sites used for waste management facilities for hazardous waste as “more vulnerable” and waste treatment (except landfill and hazardous waste facilities as “less vulnerable”. Table D3 shows that the Exception Test is also required for more vulnerable development in Flood Zone 3a.	
NQ16-719	Hilary Berry, <i>Environment Agency</i>	One can infer from the draft policy that future waste site allocation is likely to be determined in part by proximity to the larger urban areas within the county, in order to ensure that waste facilities are located as near as possible to where the waste is generated. However, the type of site required will also need to be considered, as certain types of waste management facilities, such as composting, AD and thermal treatment sites are likely to encounter local opposition, especially if they are likely to be located near to areas of residential development.	Agreed. The spatial hierarchy is based on regional policy. In developing the approach patterns of waste arisings were taken into account. We also agree that appropriate locations for different types of facility need to be identified. Policies will be developed to manage impacts on residential amenity.
PR24-1645	Mrs L Brookes	Local plans and green belt must be protected.	When completed the Waste Core Strategy will form part of the local development framework. This will be used alongside District and Borough Core Strategies (which will replace the old 'local plan' and 'structure plan' policies) to provide the planning policies against which applications for waste management will be judged. We intend to comply with national policy regarding the use of green belt, which limits the kind of uses that will be permitted.
PR25-681	Ivor Pumfrey, <i>Malvern</i>	Whilst supporting the proposal on the information	Noted.

Reference	Name/Organisation	Summary of comments	Initial officer response
PR49-1623	<i>Hills District Council & Andrew Ford, Wychavon District Council</i>	provided we would wish to reserve our final position on sight of the proposed Key Diagram.	
PR45-1661	S Cook	Permissible waste management sites would require in-depth studies and consultation - a waste of time and money if the site is not ultimately used /applied for. It is unfair to protect a potential waste site that may not ultimately be used. An appropriate waste management facility should have minimal impact on its surroundings therefore protection should not be needed.	The intention is to develop policies which will ensure that both waste management facilities and the amenity of surrounding areas are protected from adverse impacts. We will look at broad areas rather than specific sites, allowing industry to bring forward appropriate proposals.
PR52-1679	Martin Pollard/Nick Roberts, <i>Axis on Behalf of Mercia Waste Management (MWM)</i>	MWM broadly support the approach that is proposed and the preparation of a key diagram identifying the broad areas where new waste management development will be permitted. However, any such plan should avoid being overly prescriptive in terms of the identified constraints.	Support noted. Agreed.
PR52-1679	Martin Pollard/Nick Roberts, <i>Axis on Behalf of Mercia Waste Management (MWM)</i>	Waste Core Strategy Area of Coverage Map – This plan (and indeed the core strategy proposals map) should also show the extent of the ‘Central Technology Belt’ which is specifically referenced as a potentially suitable location for waste management facilities in Draft Policy Direction CS2 (see comments on this policy in Q6).	Agreed, change to be made.
NQ23-818	Miss V Kendrick, <i>CPRE Redditch Group</i>	Agree, map base to be essential. Agree, make special protection for the Cotswold and Malvern AONBs. Agree, that the balance of thinking would	Support noted. If specific sites are identified they will be shown on a map base, otherwise features will be shown diagrammatically.

Reference	Name/Organisation	Summary of comments	Initial officer response
		be a useful basis on which to develop a policy.	Special protection will be included for the Cotswold and Malvern AONBs.
NQ24-1276	Vaughan Welch, <i>The Inland Waterways Association, West Midlands Region.</i>	The policy needs to consider locating Waste Transfer Stations near or adjacent to water and rail corridors with the aim of bulk transferring to a processing/generation station using environmentally friendly method and reducing polluting road transport in the process.	The use of water and rail for waste transport is currently being investigated.
NQ24-1276	Vaughan Welch, <i>The Inland Waterways Association, West Midlands Region.</i>	Worcestershire is blessed with a river running down its core (the Severn) and one running across its eastern flank to the central core river (the Avon). Both are capable of being used to transfer waste in bulk and, effectively, replicating the methods used on the River Lee in East London to transfer waste from local Waste Transfer Stations to a purpose built suitably located processing. A method that has considerable Government support and has attracted many enabling grants.	See above.
NQ25-672	A Brodrick, <i>White Ladies Aston Parish Meeting</i>	Endorse.	Support noted.
OQ4-601	TC Ward <i>Kempsey Parish Council</i>	WCS3: Yes, but considerable consultation needed before allocations are made.	Noted.
OQ11-1689	Dr A Judge	The greenbelt should be protected and local plans respected.	When completed the Waste Core Strategy will form part of the local development framework. This will be used alongside District and Borough Core Strategies (which will replace the old 'local plan' and 'structure plan' policies) to provide the planning policies against which applications for waste

Reference	Name/Organisation	Summary of comments	Initial officer response
			management will be judged. We intend to comply with national policy regarding the use of green belt, which limits the kind of uses that will be permitted.
OQ13-1667	Mr A Murcott	Suggests that companies will be asked to apply for planning permission in a competitive environment and yet you have already contracted with Mercia. Where is the competition and why are the council not encouraging other waste management companies to apply?	Mercia Waste Management is the council's contractor for the implementation of its integrated PFI waste management contract which only deals with municipal solid waste. All other waste management issues will be addressed through the normal competitive operations of the market.
OQ15-1668	N and K Dowty	<p>There must be no interference in the green belt and the district council local plans.</p> <p>Waste sites should be as far away from population as possible in order to minimise any health affects.</p>	<p>When completed the Waste Core Strategy will form part of the local development framework. This will be used alongside District and Borough Core Strategies (which will replace the old 'local plan' and 'structure plan' policies) to provide the planning policies against which applications for waste management will be judged. We intend to comply with national policy regarding the use of green belt, which limits the kind of uses that will be permitted.</p> <p>It is national and regional policy to focus waste management facilities on developed land and existing industrial estates and similar non-residential land. We will develop policies to minimise the adverse effects of any proposals. This issue will be fully developed in the policies. Policies will also be developed that expressly seeks to prevent</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
			conflict between residential and waste uses.
OQ20-1672	Mrs M and Mr L Phillips	Future Waste allocations needs to take into consideration the people that it will directly affect and not just where the councils feel they can get away with siting these new facilities. Mercia Waste claim that they have polled 1,300 people and that 90% were in favour of the incinerator on Hartlebury TRADING ESTATE. We know that this is ridiculous as our recent village hall meeting demonstrated, hundreds of residents from Elmley Lovett, Hartlebury and the surrounding areas attended to show support for NO INCINERATOR.	It is national and regional policy to focus waste management facilities on developed land and existing industrial estates and similar non-residential land. We will develop policies to minimise the adverse effects of any proposals. This issue will be fully developed in the policies. Policies will also be developed that expressly seeks to prevent conflict between residential and waste uses. The Waste Core Strategy is not technology specific and does not propose an incinerator at Hartlebury. Any such application will be advertised and consulted upon in accordance with the council's Statement of Community Involvement, which is intended to enable local people and statutory and non-statutory consultees to express their views.
OQ24-1674	Mr P Townley	This comes across 'pre-permitted' - maybe it should show where waste facilities "may be permitted" subject to the usual assessments and controls.	Noted and agreed. Change to be made.
OQ25-1675	Mr M Harvey	Whatever we do MUST respect local plans and therefore the greenbelt.	When completed the Waste Core Strategy will form part of the local development framework. This will be used alongside District and Borough Core Strategies (which will replace the old 'local plan' and 'structure plan' policies) to provide the planning policies against which applications for waste management will be judged. We intend to comply with national policy regarding the use

Reference	Name/Organisation	Summary of comments	Initial officer response
			of green belt, which limits the kind of uses that will be permitted.

WCS4: Unallocated Sites

Reference	Name/Organisation	Summary of comments	Initial officer response
PR10-1649 PR24-1645 PR29-1650 PR37-1656 PR42-1659	Mr P Vernon & Mrs L Brookes & Mr S Tranter Mr C Rogers & Mrs L Meredith	Protect/Safeguard greenbelt.	See above.
PR27-1652	Mr TJ Harrop	Ensure no sites for new waste development in the Green Belt.	See above.
NQ6-1649	Mr P Vernon	Hartlebury trading estate is in "developed green belt" The local Wychavon plan prevents development "out of keeping" with that status.	Noted. See above. Any application for waste facilities within the green belt must demonstrate "very special circumstances" as to why it should be permitted.
NQ13-1624	<i>Wyre Forest District Council</i>	It is considered that there should be a caveat to this which states that all other locations, identified in the Waste Core Strategy, have been considered first, prior to allowing any unallocated sites to be given permission.	Noted. Agreed in principle. Policy to be developed in discussion with district councils.
NQ16-719	Hilary Berry, <i>Environment Agency</i>	A general comment is that given the extent of floodplain in Worcestershire, we would have expected flood risk to be given greater emphasis. Reference to the need to reduce flood risk could be included by appropriate wording in policy 1, 3 and/or 4.	Noted. Change to be made, subject to wording of precise policies.
NQ16-719	Hilary Berry, <i>Environment Agency</i>	The policy does not explicitly state that Greenfield sites should only be considered for future waste	Noted. We intend to comply with national and regional policy regarding the use of green

Reference	Name/Organisation	Summary of comments	Initial officer response
		development in cases where an assessment has been undertaken that demonstrates that there are no other available sites, which accord more strongly with National and Regional planning policy (e.g. sites with existing permissions for waste management or sites that are on previously developed land). The current policy appears insufficiently robust to safeguard development of Greenfield sites.	field land, which limits the kind of uses that will be permitted.
PR23-1643	Mr P Miles	Giving "special" planning permissions would have a completely unfair socioeconomic impact on the existing communities. Such a move would dramatically worsen the house values of the area and negatively impact standards of living through the perceived/or real health issues associated with such plans. If such "special" agreements were suggested then the local communities should be financially compensated for the long-term depreciation in their assets as well as the impact on their health.	Noted. Change to be made, Waste Core Strategy policies will not create any kind of "special" planning permission.
PR25-681 PR49-1623	Ivor Pumfrey, <i>Malvern Hills District Council</i> & Andrew Ford, <i>Wychavon District Council</i>	We strongly support this as a means of ensuring flexibility to meet future need providing location guidance and criteria are adequate to address inappropriate proposals.	Support noted.
PR25-681 PR49-1623	Ivor Pumfrey, <i>Malvern Hills District Council</i> & Andrew Ford, <i>Wychavon District Council</i>	The reasoning behind the introduction of Policy WCS4 is understood and accepted. However, particular care is required to ensure that local communities are able to believe that the process of locating waste facilities is genuinely 'plan led' and there is some confidence in the hierarchy and	Noted. Agreed in principle. Policy to be developed in discussion with district councils.

Reference	Name/Organisation	Summary of comments	Initial officer response
		broad locations identified and tested through the Core Strategy process.	
PR25-681 PR49-1623	Ivor Pumfrey, <i>Malvern Hills District Council</i> & Andrew Ford, <i>Wychavon District Council</i>	Elsewhere we have questioned how a key diagram may be interpreted with respect to the relative precision of broad locations for waste facilities. It is noted on Page 42 there is reference to 'sites' identified in the Key Diagram. This may suggest a level of precision that was not intended.	Agreed. Change to be made, individual "sites" will not be identified in the Waste Core Strategy.
PR25-681 PR49-1623	Ivor Pumfrey, <i>Malvern Hills District Council</i> & Andrew Ford, <i>Wychavon District Council</i>	Where unallocated sites / locations for facilities come forward, it is suggested that any policy ought to include reference to testing the reasonable prospect of sites in preferred locations coming forward during the plan period and meeting planned / expected demand requirements.	Noted. Agreed in principle. Policy to be developed in discussion with district councils.
PR34-1625	Katie Limm, <i>Belbroughton Parish Council</i>	The documents suggests that sites, including greenfield sites, which have not already been identified as suitable ('unallocated sites') would not be ruled out provided the proposal does not result in significant adverse impact on the countryside or its functions. We suggest that 'or neighbours' should be added to the criteria.	Noted. Agreed in principle. Policy to be developed in discussion with district councils.
PR45-1661	S Cook	Siting of waste management facilities should not be decided based on proximity to waste alone.	Agreed. It is national and regional policy to focus waste management facilities on developed land and existing industrial estates and similar non-residential land. We will develop policies to minimise the adverse effects of any proposals. This issue will be fully developed in the policies. Policies will also be developed that expressly seeks to prevent conflict between residential and

Reference	Name/Organisation	Summary of comments	Initial officer response
PR52-1679	Martin Pollard/Nick Roberts, <i>Axis on Behalf of Mercia Waste Management (MWM)</i>	MWM agree that the Council should be flexible in terms of their waste management provision and should not preclude the development of waste management facilities outside of the broad areas identified on the key diagram if it can be demonstrated to be either equally or more suitable for a particular development. We also agree that greenfield sites should not be excluded as some waste management facilities (e.g. composting) are potentially more suitable in such locations.	waste uses. Support noted.
PR52-1679	Martin Pollard/Nick Roberts, <i>Axis on Behalf of Mercia Waste Management (MWM)</i>	<p>The main area of concern that MWM have regarding the wording of the emerging policy is the requirement for applications for developments on unallocated sites (i.e. those sites outside the broad areas that will be identified on the key diagram) to be supported by an independent Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA). We do not consider that this should be a requirement for applicants to fulfil when preparing planning applications for waste management developments on unallocated sites, for the following reasons:</p> <p>1. The publication of PPS10 and its Companion Guide made alterations to the waste management policy context. These include removal of the concept of BPEO, and changes to the way in</p>	Agreed. Change to be made to clarify where an Environmental Impact Assessment will be necessary.

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>which self-sufficiency and proximity are employed. BPEO is replaced with a combination of SA and SEA for the production of RSS and waste development frameworks. The purpose of undertaking the SA is (as set out in PPS12) to ensure that there is a sound evidence base for the plan and for an integrated part of the plan preparation process. Accordingly, if the policies of the core strategy are supported by an SA/SEA there should be no requirement for applicants to undertake a separate assessment themselves.</p> <p>2. It would only normally be a requirement for an applicant to undertake an independent SA/SEA if they were seeking to allocate a particular site within an emerging development plan. However, on the basis that WCC is not proposing specific site allocations this should not be necessary.</p> <p>We do not consider that the requirement for SA/SEA is appropriate for inclusion in a policy relating to waste management development on unallocated sites. We suggest that the wording is amended to require that on the Environmental Impact Assessment (EIA) should accompany applications for development. This should, on unallocated sites, demonstrate that they comply with relevant national / regional policy.</p>	
NQ23-818	Miss V Kendrick, <i>CPRE Redditch Group</i>	Agree with market flexibility provided the locations are suitable.	Support noted.

Reference	Name/Organisation	Summary of comments	Initial officer response
NQ23-818	Miss V Kendrick, <i>CPRE Redditch Group</i>	<p>"Should include a full consideration of the appropriate alternative sites and the implications for protected species, habitats and features of the proposal" - agree.</p> <p>"previously developed land or redundant agricultural or forestry buildings" - include urban employment land. Greenfield sites and Green Belt suitable if required - Disagree with thinking.</p> <p>Broad approaches to categorise sites: Consider that all three may be required.</p>	<p>Support noted.</p> <p>The policy will be based on national and regional policy criteria for where waste management facilities should be developed. Change to be made for clarification. We intend to comply with national and regional policy regarding the use of greenbelt and green field land, which limits the kind of uses that will be permitted, which may include activities such as composting unsuited to urban employment land.</p>
NQ25-672	A Brodrick, <i>White Ladies Aston Parish Meeting</i>	We approve of the need to be flexible and we also approve the statement contained in this policy especially the need for SA/SEA and other relevant assessments.	Support noted. Policy to be changed, however, to clarify requirement for EIA where appropriate.
NQ30-716	Amanda Smith, <i>English Heritage (West Midlands)</i>	In referring to a supporting SEA/SA it must be recognised that full scope of these assessments and that the historic environment and landscape are also required components in any assessment not just 'protected species, habitats and features'.	Noted, see above.
OQ11-1689	Dr A Judge	Protect the greenbelt.	We intend to comply with national and regional policy regarding the use of greenbelt land, which limits the kind of uses that will be permitted.
OQ15-1668	N and K Dowty	See comments in WCS3.	Noted.
OQ19-	Mr R Archard	WCS4 Use of greenfield sites needs to be limited	We intend to comply with national and

Reference	Name/Organisation	Summary of comments	Initial officer response
1671		to treatment such as windrow composting where any necessary building would have negligible impact.	regional policy regarding the use of green field land, which limits the kind of uses that will be permitted.
OQ20-1672	Mrs M and Mr L Phillips	<p>This as we know seems to suggest that where it appears that a site such as Hartlebury Trading estate is just that a TRADING ESTATE and not AN INDUSTRIAL ESTATE will suddenly meet "certain criteria" just because it is convenient and because Worcester CC bought the proposed site 3 years ago. Worcester CC took out a 999 lease in 2007 at a cost to the taxpayer of £3.85M, as such, there is clearly a conflict of interest since it is Worcs CC PLANNING DEPT MAKING THE DECISION on any planning application. Energy from Waste. Incinerators are not viable and end up being subsidised by us the taxpayers...Nottingham CC are currently subsidising theirs by £100,000.00 per month, there are clearly better alternatives to incineration. The benefits of putting energy back out onto the National Grid is nothing more than a sales pitch. The cost involved in doing this, to the taxpayer will far out weigh any benefit.</p> <p>Emphasis needs to be put on reducing the production of waste and on recycling.</p>	<p>It is national and regional policy to focus waste management facilities on developed land and existing industrial estates and similar non-residential land. We will develop policies to minimise the adverse effects of any proposals. This issue will be fully developed in the policies. Policies will also be developed that expressly seeks to prevent conflict between residential and waste uses. The Waste Core Strategy is not technology specific and does not propose an incinerator at Hartlebury. Any such application will be advertised and consulted upon in accordance with the council's Statement of Community Involvement, which is intended to enable local people and statutory and non-statutory consultees to express their views. The decision whether or not to approve any applications for planning permission is made by the Council as the Local Planning Authority in accordance with National, Regional and Local policy, not as the Waste Disposal Authority. Applications which do not accord with the development plan will be refused, as was the case with the proposed incinerator at Kidderminster.</p> <p>Agreed. The Waste Core Strategy will be based on the principle of moving waste up the</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
			waste hierarchy, which favours reuse and recycling over disposal. This is included as Objective 4.
OQ21-670	Councillor Dawn Merriman <i>Warndon Parish Council</i>	Greenfield sites should be used as a last resort.	We intend to comply with national and regional policy regarding the use of green field land, which limits the kind of uses that will be permitted.
OQ24-1674	Mr P Townley	Agree with the proviso that the usual assessments/controls are carried out.	Noted.
OQ25-1675	Mr M Harvey	As point 3 above.	Noted.

WCS5: How much Waste Capacity do we need?

Reference	Name/Organisation	Summary of comments	Initial officer response
NQ9-817	Frank Hill, <i>Campaign to Protect Rural England</i>	Page 15: Policy WCS5: it is unclear how the MSW levels can be reduced by 40% by March 2010. If that is possible why does it take another 5 years to reach 45%?	These are national targets which the reviewed Joint Municipal Waste Management Strategy is designed to achieve. This is the timetable in the reviewed JMWMS.
PR16-1216	Mr M Philpott, <i>Salford Priors Parish Council</i>	In respect of WCS3 and WCS5 we are concerned that insufficient capacity is being identified.	Noted, the strategy will be based on the concept of a capacity gap and there is no intention to limit the number of facilities provided subject to the concept of equivalent self-sufficiency for Worcestershire. The strategy will be monitored annually and reviewed if there is evidence of insufficient capacity.
PR16-1216	Mr M Philpott, <i>Salford Priors Parish Council</i>	Capacity requirements: using the document we have tried to compare total waste quantities and total treatment and disposal capacities for each of	See above.

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>the milestone years. Our calculations indicate that there could be a small shortfall if the diversion targets for C&I waste are achieved but if they are not then the shortfall in available capacity is very large.</p> <p>We also feel that proposals for a 250,000 tpa energy from waste plant or appropriate alternative should be brought forward a lot sooner than 2034 as suggested in the report. However, we would caveat our comments in this case as it is very difficult to draw out some of the figures from the report.</p>	<p>Change to be made to clarify that a residual treatment plant with a capacity of up to 250,000 tpa for municipal solid waste needs to be developed as soon as possible.</p>
NQ13-1624	<i>Wyre Forest District Council</i>	<p>Support the approach to ensuring sufficient waste capacity is provided in Worcestershire to meet the arisings.</p>	<p>Support noted.</p>
NQ16-719	Hilary Berry, <i>Environment Agency</i>	<p>The table given that shows kg per household reduction targets for MSW does not state the rate of these arisings – e.g. are these figures per year?</p> <p>Increasing the number of recycling facilities might have an impact, either positive or negative, on transport sustainability. Promoting the co-location of facilities under the proximity principle could potentially mitigate adverse effects by removing the need for a more widely spread spatial network of waste transfer stations. However, this should be carefully weighed up against the need to ensure the development of waste infrastructure as close as possible to the sources of waste.</p>	<p>Noted, change to be made to clarify kg per household per year.</p> <p>Noted, this issue will be explored further in the SA of the emerging Strategy.</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
PR25-681 PR49-1623	Ivor Pumfrey, <i>Malvern Hills District Council</i> & Andrew Ford, <i>Wychavon District Council</i>	Please note Question 2 comments in relation to future landfill capacity.	Noted.
PR36-1655	Mrs LM Bryan	"Thermal capacity of at least 250,000 tpa" large incinerators have to be fed 24hrs/7days/wk to be efficient. If we are hoping to increase recycling, reducing etc the use of incinerators does not encourage this. EFW plants are not flexible, involve large amounts of tonne mileage.	The Waste Core Strategy will be based on the principle of moving waste up the waste hierarchy, which favours reuse and recycling over disposal. This is included as Objective 4. The Waste Core Strategy is not technology specific and does not propose an incinerator.
PR52-1679	Martin Pollard/Nick Roberts, <i>Axis on Behalf of Mercia Waste Management (MWM)</i>	MWM supports the targets for MSW as they are entirely consistent with those set out within Waste Strategy England 2007 and the Joint Municipal Waste Management Strategy review document. It is recommended that a table showing the landfill diversion, maximum landfill requirement and new waste management capacity requirements is provided for MSW as well as C&I waste. This will provide greater clarity regarding the 'capacity gap'	Support noted. Noted, to be developed in consultation with the council's Waste Management section.
NQ23-818	Miss V Kendrick, <i>CPRE Redditch Group</i>	Unimplemented Permissions, p16 (Summary): Agree both paragraphs.	Support noted.
NQ37-741(L)	Mike Price, <i>Government Office for the West Midlands</i>	We note what is said about uncertainty. However the Core Strategy needs to be based on evidence based assumptions about the amount of waste to be dealt with, with flexibility and a view of how to deal with changes in circumstances. You have identified that there is movement of	Noted. Concept of risk assessment will be explored to consider this issue further. The Waste Core Strategy will recognise the

Reference	Name/Organisation	Summary of comments	Initial officer response
		waste in and out of the County. Should there be an aim to reduce that movement in terms of sustainability?	need for cross-boundary co-operation, however it is inevitable that economies of scale mean that some wastes will be imported and exported into and out of the county. The strategy will seek to minimise this and, in line with the West Midlands Regional Spatial Strategy panel report, will be based upon achieving equivalent self-sufficiency in waste management capacity.
NQ37-741(L)	Mike Price, <i>Government Office for the West Midlands</i>	Capacity. You accept that there are changing circumstances; consequently flexibility and monitoring are important. It is good to see that you recognise this. Options appear to be based around whether you provide for different needs or not. This should translate in the preparation of the Core Strategy to consideration of options around how evidence based requirements are to be met.	Noted.
OQ13-1667	Mr A Murcott	WCS5 is not sufficiently ambitious. What pressure is the council putting on companies to reduce their packaging?	The strategy will be based on the concept of a capacity gap and there is no intention to limit the number of facilities provided subject to the concept of equivalent self-sufficiency for Worcestershire. The strategy will be monitored annually and reviewed if there is evidence of insufficient capacity. The council's Waste Management and Economic Development sections will work to reduce all waste streams through other means.
OQ15-1668	N and K Dowty	All documentation shows an increase in MSW over the years, however should more be recycled surely this should REDUCE?	The figures for MSW are based on assessments of national and regional increases in total MSW production. The reviewed Joint Municipal Waste Management

Reference	Name/Organisation	Summary of comments	Initial officer response
			Strategy aims to reduce these increases and promote recycling. The Waste Core Strategy will enable the necessary facilities to be developed.
OQ19-1671	Mr R Archard	WCS5 The proposals for biodegradable waste landfilled are far too unambitious.	The strategy will be based on the concept of a capacity gap and there is no intention to limit the number of facilities provided subject to the concept of equivalent self-sufficiency for Worcestershire. The strategy will be monitored annually and reviewed if there is evidence of insufficient capacity. The policies developed will enable biodegradable wastes to be composted or treated through anaerobic digestion if proposals to do so are made.
OQ21-670	Councillor Dawn Merriman <i>Warndon Parish Council</i>	Not sufficient knowledge on subject to comment, but agree in principle.	Noted.
OQ24-1674	Mr P Townley	It is useful to have "targets" - as these may avoid 'spurious precision'.	Noted.

WCS6: Safeguarding

Reference	Name/Organisation	Summary of comments	Initial officer response
PR8-1063	Mr D Talsma, <i>GKN Corporate Centre</i>	WCS 1, 2, 6, 7, 11 are rather vague and untargetted. Preferred options are most useful when aimed at clear, discernable needs	Policies and their specific wording are being developed.
NQ13-1624	<i>Wyre Forest District Council</i>	Regarding Unimplemented Permissions: Strongly support this approach. By safeguarding areas which already have planning permission this could halve the amount of land that will be	Support noted.

Reference	Name/Organisation	Summary of comments	Initial officer response
		required to be found for waste management sites during the lifetime of the strategy.	
NQ13-1624	<i>Wyre Forest District Council</i>	<p>Agree in part to this approach. Current sites and sites with unimplemented planning permissions should be safeguarded for waste management uses. However, as the document does not identify future sites, or provide information as to the level, type and scale of development that might be proposed the District Council is unable to comment on the suitability of safeguarding sites that might appear on the Key Diagram.</p> <p>Before commenting fully, distances need to be defined (and a methodology for defining these distances identified) and sites need to be identified on the Key Diagram. Until this has happened it is difficult to fully assess the suitability of the draft policy.</p> <p>Care also needs to be taken that other development is not stifled within areas due to the identification of a site as being suitable for Waste Management Facilities. There would need to be some certainty that waste management facilities were to be implemented at a site, before being able to refuse permission on this basis alone.</p>	Noted, broad areas will be identified in consultation with the District Councils so that this issue can be addressed.
NQ13-1624	<i>Wyre Forest District Council</i>	The District Council wishes to retain its independency to decide applications into the future. The Waste Core Strategy will form an important document in the decision making process, however, it will be important that the District Council takes on board all material considerations when deciding applications.	Noted and agreed.

Reference	Name/Organisation	Summary of comments	Initial officer response
PR52-1679	Martin Pollard/Nick Roberts, <i>Axis on Behalf of Mercia Waste Management (MWM)</i>	MWM believe that the focus of the emerging policy should be more neutral and rather than setting a presumption in favour of other development the introduction to the policy should simply state that: "Proposals for development within either a defined distance of or on existing / proposed waste facilities or sites identified on the key diagram will be assessed against the following criteria:"	Agreed in principle, policy wording to be developed.
NQ23-818	Miss V Kendrick, <i>CPRE Redditch Group</i>	Agree.	Noted.

WCS7: Assessing the Waste Implications of New Development

Reference	Name/Organisation	Summary of comments	Initial officer response
PR16-1216	Mr M Philpott, <i>Salford Priors Parish Council</i>	In respect of WCS7 we agree that guidance on future methods of treatment should not be provided.	Support noted.
NQ13-1624	<i>Wyre Forest District Council</i>	Support for this approach but consider that all new developments should make provision for waste recycling / storage. Whilst the second bullet point is broadly welcomed there is a need to consider practicalities in terms of the DC process.	Agreed in principle, wording to be developed in consultation with the District Councils.
NQ16-719	Hilary Berry, <i>Environment Agency</i>	Site waste management plans are already required for all new developments of a capital value of greater than £300,000. Policy should take account of this. It is encouraging though, that the draft policy will capture developments that fall outside of the above bracket. This should help to significantly reduce the volumes of C & D waste	Noted, change to be made.

Reference	Name/Organisation	Summary of comments	Initial officer response
		produced in the county.	
PR25-681 PR49-1623	Ivor Pumfrey, <i>Malvern Hills District Council</i> & Andrew Ford, <i>Wychavon District Council</i>	<p>Whilst supporting the proposals we consider that the requirement to include facilities for the occupiers of premises to separate and store wastes produced to enable recycling or composting unless adequate provision exists already should apply to all the above mentioned types of development, irrespective of size. Many of the present "hard to reach" properties in terms of kerbside recycling services are in small scale residential developments.</p> <p>The proposals for waste auditing should not overlap with other requirements relating to site waste management plans to prevent duplication and ensure true added value.</p> <p>We welcome draft Policy WCS7 which seeks to address the waste implications of new development. However, consideration needs to be given to how requirements such as recycling and composting can be achieved in higher density residential developments including apartments and grouped facilities.</p>	Agreed in principle, wording to be developed in consultation with the District Councils.
PR27-1652	Mr TJ Harrop	Do not employ energy from waste (incineration) there are better solutions.	The Waste Core Strategy is not technology specific and does not propose an incinerator. The Waste Core Strategy will set a framework to assess any proposals which might be made. All forms of thermal treatment, including incineration, have been considered in the background document " <i>Recovering Energy from Waste</i> ", available on our website www.worcestershire.gov.uk/wcs .

Reference	Name/Organisation	Summary of comments	Initial officer response
PR48-1622	Lindsay Wood, <i>Worcester City Council</i>	Would District DC officers handle this information or would it be sent to relevant department at County/Environment Agency? Will need to see if this policy would have/need to be reference in SWJCS as it would be an important consideration of any large development – same with the proposed policy for unviable soil being used in the landscaping.	Noted. This aspect of the monitoring section needs to be clarified with other stakeholders. Policies will be developed in consultation with the District Councils.
PR48-1622	Lindsay Wood, <i>Worcester City Council</i>	p.44 or The development proposed – small t? p.47 'f-or' – needs to be joined up	Noted, change to be made.
NQ23-818	Miss V Kendrick, <i>CPRE Redditch Group</i>	Agree.	Support noted.
NQ25-672	A Brodrick, <i>White Ladies Aston Parish Meeting</i>	For the past 12 years since the original waste contract we have frequently requested that all facilities should actively encourage waste reduction and that recycling should be part of any planning application. This should target all developments, not just ones over a certain size.	Noted, change to be made.

WCS8: What kind of facilities do we need?

Reference	Name/Organisation	Summary of comments	Initial officer response
PR10-1649	Mr P Vernon	Eliminate Incineration - Concentrate on Anaerobic Digestion.	The Emerging Preferred Options paper is not technology specific and seeks to allocate land for all kinds of facilities, which could include both thermal treatment and AD facilities. <i>Worcestershire Waste core Strategy</i>

Reference	Name/Organisation	Summary of comments	Initial officer response
			<i>Background Document: Recovering Energy from Waste</i> considers issues relating to both thermal treatment and anaerobic digestion.
NQ13-1624	Wyre Forest District Council	General support for this policy approach.	Support noted.
NQ16-719	Hilary Berry, Environment Agency	These proposals are strongly supported.	Support noted.
PR24-1645	Mrs L Brookes	Eliminate Incineration-alternative anaerobic digestion.	The Emerging Preferred Options paper is not technology specific and seeks to allocate land for all kinds of facilities, which could include both thermal treatment and AD facilities. <i>Worcestershire Waste core Strategy Background Document: Recovering Energy from Waste</i> considers issues relating to both thermal treatment and anaerobic digestion.
PR28-1651	Mr P Spalton	I believe that wherever possible the emphasis should be to exploit recycling and composting technologies at a local level rather than landfill and thermal facilities.	Noted and agreed. This is the principle behind the waste hierarchy which the Waste Core Strategy seeks to implement.
PR29-1650	Mr S Tranter	Work on Anaerobic digestion and not incineration.	The Emerging Preferred Options paper is not technology specific and seeks to allocate land for all kinds of facilities, which could include both thermal treatment and AD facilities. <i>Worcestershire Waste core Strategy Background Document: Recovering Energy from Waste</i> considers issues relating to both thermal treatment and anaerobic digestion.
PR37-1656	Mr C Rogers	Anaerobic digestion.	See above.
PR39-1657	Tom Beard, Ecohomomic Solutions Ltd, Heartfood,	Composting or landfilling food waste is a wasted resource given what it can achieve via AD (electric/gas/fertiliser).	See above.

Reference	Name/Organisation	Summary of comments	Initial officer response
	<i>Worcester Greenpeace, Transition Foods</i>	At the top of the hierarchy and strategy should be EDUCATION explain why the technology has been selected and what compliance it requires does not mean leaflets through the letter box. Door to door is required. If nearly everyone complies and segregates properly then waste is minimised.	We agree that education has an important role to play in achieving the minimisation of waste. This is beyond the remit of the Waste Core Strategy, but is being undertaken as part of the reviewed Joint Municipal Waste Management Strategy.
PR41-1658 PR44-1680	Mr Meredith & Mr R Meredith	Use of efficient waste handling facilities.	Noted. Policies will be developed to ensure that adverse effects from waste management facilities are minimised but the efficiency of each site depends upon the operator.
PR42-1659	Mrs L Meredith	No need for incineration.	The Waste Core Strategy is not technology specific and does not propose an incinerator. The Waste Core Strategy will set a framework to assess any proposals which might be made. All forms of thermal treatment, including incineration, have been considered in the background document " <i>Recovering Energy from Waste</i> ", available on our website www.worcestershire.gov.uk/wcs .
NQ19-1644	Mr and Mrs Hemmings	We totally support recycling and do not support in any way the use of incineration. We would be grateful if our views could be added to your documentation.	The Waste Core Strategy is not technology specific and does not propose an incinerator. The Waste Core Strategy will set a framework to assess any proposals which might be made. All forms of thermal treatment, including incineration, have been considered in the background document " <i>Recovering Energy from Waste</i> ", available on our website www.worcestershire.gov.uk/wcs .

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>We understand Lawrence of Stourport have been given a grant by the Government to build a new recycling site, and they have been successful in recycling 97%.</p> <p>We also feel no recycling sites should be close to farmland whether agricultural or livestock</p>	<p>Noted.</p> <p>We intend to comply with national and regional policy regarding the use of green field land, which limits the kind of uses that will be permitted.</p>
PR52-1679	Martin Pollard/Nick Roberts, <i>Axis on Behalf of Mercia Waste Management (MWM)</i>	MWM agree that the policy should not be overly prescriptive in terms of specifying exactly what facilities will be required in the future. However, there is certainly merit in specifying certain types of development that are required over the plan period, particularly as they are also identified as being required within the JMWMS.	Noted and agreed.
NQ23-818	Miss V Kendrick, <i>CPRE Redditch Group</i>	Ensure using all existing usable sites before establishing new facilities - it will help reduce the need for more land.	Noted. Agreed in principle. Policy to be developed in discussion with district councils.
NQ23-818	Miss V Kendrick, <i>CPRE Redditch Group</i>	Special kinds of management facilities, p18: Agree.	Support noted.
NQ25-672	A Brodrick, <i>White Ladies Aston Parish Meeting</i>	Endorse.	Support noted.
OQ9-1626	Mr M Wedd	WCS8 The facilities should maximise the conversion of waste to useable power via thermal or Anaerobic Digestion.	The Waste Core Strategy will set a framework to assess any proposals which might be made. All forms of thermal treatment, including incineration, have been considered in the background document " <i>Recovering Energy from Waste</i> ", available on our website

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>WSC9 An absolute minimum of landfill as this is just wasted heat or Methane generation.</p> <p>Landfill Mining should be supported after an economic assessment proves not only the financial case is sound but also demonstrates that the Methane reduced exceeds the CO2 liberated to recover the useful waste products.</p>	<p>www.worcestershire.gov.uk/wcs.</p> <p>Noted and agreed.</p> <p>Agreed in principle but the assessment of gas emissions is probably not possible at present. The council is a Beacon authority for climate change issues and we will monitor developments to assess if this concept can be included in this or any revisions of the Waste Core Strategy.</p>
OQ10-1503	Mr B Jordan	The documentation does not cover the implications of incineration. It should not be considered solely on commercial grounds.	The Waste Core Strategy is not technology specific and does not propose an incinerator. The Waste Core Strategy will set a framework to assess any proposals which might be made. All forms of thermal treatment, including incineration, have been considered in the background document " <i>Recovering Energy from Waste</i> ", available on our website www.worcestershire.gov.uk/wcs .
OQ11-1689	Dr A Judge	Rule out use of incineration. Focus on Anaerobic digestion as a sustainable alternative.	See above.
OQ13-1667	Mr A Murcott	The council is proposing to burn far too much. It represents by far the biggest single method of proposed disposal.	See above.
OQ15-1668	N and K Dowty	Incineration is not justified. There are other better methods, using less tax payers funds and more environmentally friendly. E.G Anaerobic digestion or gasification.	See above.
OQ19-	Mr R Archard	WCS8 This explicitly includes incineration which	See above.

Reference	Name/Organisation	Summary of comments	Initial officer response
1671		is absurd; should at least be left neutral on this.	
OQ24-1674	Mr P Townley	This seems to tie-in with my comments for Q4.	Noted.
OQ25-1675	Mr M Harvey	Anaerobic Digesters. Incinerators will be expensive and cause no end of problems to the council, taxpayer and environment.	See comment to Mr Jordan above.

WCS9: Landfill

Reference	Name/Organisation	Summary of comments	Initial officer response
NQ9-817	Frank Hill, <i>Campaign to Protect Rural England</i>	Page 19 (summary): Policy WCS9: After the last bullet point we would like to see "The landscape character and agricultural quality of the land" etc. Perhaps there could be another bullet point for "The proximity of residential properties to the site and its access roads."	Agreed in principle. Policy wording to be developed, change to be considered.
PR6-330	David Doley, <i>Banbury Windows Ltd</i>	Landfill will always be required for residual waste that cannot be re-used or treated alongside hazardous wastes.	Noted and agreed.
NQ13-1624	<i>Wyre Forest District Council</i>	Support for this policy approach. By restricting landfill permissions, the onus will be to deal with waste in a more sustainable fashion.	Support noted.
NQ16-719	Hilary Berry, <i>Environment Agency</i>	Draft Policy WCS9 refers to non-inert landfill sites only. We recommend that it should also apply to inert landfill sites, as the landfilling of waste should only be considered as an absolute last resort. This also would effectively "leave the door open" for inert landfill site applications and so there would be little incentive to manage C & D waste further up the hierarchy. This conflicts in	Agreed in principle. Policy wording to be developed, change to be considered.

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>part also with WCS7's proposals to help reduce C & D waste arisings as the result of new developments.</p> <p>The possible justification bullet points should be "and" rather than "or", however it would be clearer to address flood risk by rewording " surface water or groundwater conditions or flood management" by stating... "There should be no increase in all forms of flooding (surface water, groundwater, foul water, fluvial) and this should be demonstrated by an FRA".</p>	
NQ18-169	Shaun Denny, <i>Cemex</i>	<p>The Company is concerned regards Draft Policy Direction WCS9 as it relates to the disposal of inert waste by landfill. The council appear to be stating that it will require planning applications for such development to demonstrate that the development would result in an improvement to one or more of the following:</p> <ul style="list-style-type: none"> • the setting or consideration of any protected features nearby (eg of historical, archaeological or cultural or nature conservation value) • surface water or groundwater conditions or flood management the viability of any agricultural or forestry unit involved or • the landscape character of the land <p>It is felt that this approach places a disproportionate burden upon the developers of inert waste landfill facilities when compared to other forms of both waste and non-waste development to, it is illogical to require such</p>	Noted. Policy wording to be developed, change to be considered.

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>development alone to meet such a test, and that such an approach is not supported by Regional or National Policy and guidance.</p> <p>A more appropriate test would be one of demonstrating no materially significant detriment to these matters but seeking to encourage improvement where this can be achieved, providing developers of inert landfill facilities with more parity with other developers.</p>	
PR38-Anon	Anonymous	Very large incinerators to bulk burn and produce electricity or steam as a by-product should not be a proposal to justify the disuse of landfill sites	The Waste Core Strategy acknowledges that the continued landfilling of some waste will be necessary up until at least 2026.
PR52-1679	Martin Pollard/Nick Roberts, <i>Axis on Behalf of Mercia Waste Management (MWM)</i>	WCS9 Landfill MWM supports the suggested policy wording associated with landfill provision and considers that it is compliant with Policies W11 and W12 of the emerging RSS (Phase 2 Revision) and PPS10. The company agrees that it is appropriate for the policy to be flexible in order to prevent any shortfall in capacity during the plan period.	Support noted.
NQ23-818	Miss V Kendrick, <i>CPRE Redditch Group</i>	<p>Agree the Worcestershire Biodiversity or Geodiversity Action Plan or the County Landscape Appraisal provide special provisions should new inert landfill sites occur, but only if justified. The Statutory Body to consider all four points listed.</p> <p>CPRE still consider that Greenfield and Green Belt should not be used.</p>	<p>Support noted.</p> <p>We intend to comply with national and regional policy regarding the use of greenbelt and green field land, which limits the kind of</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
			uses that will be permitted.
NQ25-672	A Brodrick, <i>White Ladies Aston Parish Meeting</i>	Endorse.	Support noted.
OQ24-1674	Mr P Townley	Emphasis on 'no non-inert' landfilling - as methane is so much more destructive compared to CO2.	Agreed in principle. We will develop policies for the management of landfill gas. The council is a Beacon authority for climate change issues and we will monitor developments to assess if this concept can be included in this or any revisions of the Waste Core Strategy.

WCS10: Energy from Waste

Reference	Name/Organisation	Summary of comments	Initial officer response
PR10-1649	Mr P Vernon	Energy Recovery is vital - but better from AD via biogas than incineration. Residual waste can be reduced by 100,000 tonnes if AD is used after sorting of black bag waste. Incineration has no place in waste management but I do fully support energy recovery from Anaerobic digestion.	The Emerging Preferred Options paper is not technology specific and seeks to allocate land for all kinds of facilities, which could include both thermal treatment and AD facilities. <i>Worcestershire Waste Core Strategy Background Document: Recovering Energy from Waste</i> considers issues relating to both thermal treatment and anaerobic digestion.
NQ6-1649	Mr P Vernon	Incineration as a technique to deal with residual waste is too costly in terms of greenhouse gasses, dioxins, toxic metals, ash and cash and is contrary to many directives and initiatives.	See above.
NQ6-1649	Mr P Vernon	Hartlebury residents are not NIMBY's but oppose incineration in this area and all areas as it deters	The Waste Core Strategy is not technology specific and does not propose an incinerator

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>recycling and creates health and environmental hazards. Whatever levels are considered to have no impact on health currently it is immoral and obscene to allow emission of any amount of known toxins from a municipal site. Carbon dioxide emission could even attract a tax within the period of the plan. Energy from waste is an important consideration but only after recycling has been maximized. Then there are much better technical, operational and cost efficient options than incineration, which coincidentally do have environmental benefits.</p> <p>The option to fully segregate waste streams (where Wychavon has been very successful to date) should be completed not abandoned to the flames of an incinerator. We really are going to spoil the ship for a ha'peth of tar! Anaerobic digestion will then take care of the remainder of the problem creating EfW with CHP. Such [AD] plants are small and can be in complete accordance with the Proximity principle of waste strategy.</p>	<p>at Hartlebury. All applications with potentially significant environmental impacts will be required to include an Environmental Impact Assessment, this would include a traffic impact assessment. The Environment Agency is responsible for advising the council on the pollution implications of waste management proposals and will be consulted on both the emerging strategy and any specific proposals.</p> <p><i>Worcestershire Waste Core Strategy Background Document: Recovering Energy from Waste</i> considers issues relating to both thermal treatment and anaerobic digestion.</p>
NQ13-1624	<i>Wyre Forest District Council</i>	Any policy chosen for this specific area will require careful consideration and should be based on the most recent information available.	Noted, policy to be developed in consultation with the District Councils.
NQ13-1624	<i>Wyre Forest District Council</i>	<p>Regarding " Any such policy will need to specify that Planning Permission will be granted for energy from waste proposals, provided that it was basically sustainable. We would need to set criteria to require at least that:</p> <ul style="list-style-type: none"> • The sorting of waste is carried out; 	Agreed in principle. See above.

Reference	Name/Organisation	Summary of comments	Initial officer response
		<ul style="list-style-type: none"> • Energy recovery is maximised • Value recovery from by-products is maximised" <p>Disagree, consider that proposals will need to be fully sustainable. Dislike the use of the word 'basically'. Extra criteria regarding the health and safety and pollution implications of this type of development could also usefully be included here.</p>	
NQ10-908	Peter Luff, <i>MP</i>	<p>I accept the case for some local waste-to-energy incineration on the basis of waste minimisation, full recycling and the use of all technologies genuinely to minimise the waste produced for incineration. As you may be aware, the very large proposed energy-to-waste plant at Hartlebury has attracted a great deal of opposition. I share the concerns of the community about this proposal and will respond to the planning application in due course. I am particularly concerned about the environmental sustainability of large-scale incineration and the need to transport low calorific value waste over long distances. Incineration of residual waste-if it is genuinely residual after recycling technologies have been deployed - should be done at a local level, generating heat and power for local communities. At a recent public meeting about the incinerator, I was hugely impressed by the constructiveness of the debate and detailed knowledge about waste management that was on display. There was deep frustration that a more sustainable solution could not be found to deal with the waste. The</p>	<p>The Waste Core Strategy is not technology specific and does not propose an incinerator at Hartlebury. All applications with potentially significant environmental impacts will be required to include an Environmental Impact Assessment, this would include a traffic impact assessment. The Environment Agency is responsible for advising the council on the pollution implications of waste management proposals and will be consulted on both the emerging strategy and any specific proposals.</p> <p><i>Worcestershire Waste Core Strategy Background Document: Recovering Energy from Waste</i> considers issues relating to both thermal treatment and anaerobic digestion.</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
		Waste strategy is the opportunity for such an approach to be adopted.	
NQ16-719	Hilary Berry, <i>Environment Agency</i>	<p>Value recovery is included in WCS 10 and this may need to be separated away from this, as the processing of construction waste to produce secondary aggregates for example does not sit well under this policy.</p> <p>We recognise that it might be appropriate for local authorities to include energy from waste plants in their long-term plans, however we consider that this should be subject to the following considerations:</p> <ul style="list-style-type: none"> - it does not affect their strategies to reduce the amount of waste produced or increase the amount that is reused and recycled; - they form part of a regional or local waste management strategy; and -they contribute to the development of a network of waste disposal and treatment facilities where waste is disposed of or treated near to where it was produced. <p>The draft policy should be clearer in stating the above points.</p>	<p>Noted. Policy wording and further proposals for the management of C&D waste to be developed, change to be considered.</p> <p>The Emerging Preferred Options paper is not technology specific and seeks to allocate land for all kinds of facilities, which could include both thermal treatment and AD facilities. <i>Worcestershire Waste Core Strategy Background Document: Recovering Energy from Waste</i> considers issues relating to both thermal treatment and anaerobic digestion. Change to policy wording to be considered.</p>
NQ16-719	Hilary Berry, <i>Environment Agency</i>	Policy appears to suggest that sources of EfW might be limited purely to the combustion of landfill gas. The proliferation of landfill as a primary disposal option should not be encouraged and so limiting EfW proposals to existing landfill sites will reduce the overall dependence on landfill disposal and will	Noted, change to be made to clarify policy wording. The policy will not be limited solely to the combustion of landfill gas.

Reference	Name/Organisation	Summary of comments	Initial officer response
		not provide sufficient opportunity for Worcestershire County Council to utilise EfW for CHP in meeting its renewable energy targets. We recommend that an energy from waste policy should be more explicit in supporting and encouraging CHP from other sources and should not be limited solely to the combustion of landfill gas.	
PR24-1645	Mrs L Brookes	Energy recovery can be made from AD, Biogas is energy NO INCINERATION	The Emerging Preferred Options paper is not technology specific and seeks to allocate land for all kinds of facilities, which could include both thermal treatment and AD facilities. <i>Worcestershire Waste Core Strategy Background Document: Recovering Energy from Waste</i> considers issues relating to both thermal treatment and anaerobic digestion.
PR25-681 PR49-1623	Ivor Pumfrey, <i>Malvern Hills District Council</i> & Andrew Ford, <i>Wychavon District Council</i>	The consultation document simply poses a number of general questions regarding applications for energy from waste and it is therefore difficult to respond in detail. Whilst the principle of energy from waste is supported in principle any policy must consider the impact of the proposal from end to end on the specific site and wider area. Whilst some energy from waste processes could be accommodated within employment areas, others may not. Particularly, given the consultation document's emphasis on locating facilities within urban areas, possibly within urban extensions. In which instances the scale of the proposal, traffic movements, sorting processes and by-products	Noted. Policy wording will be developed in consultation with the District Councils.

Reference	Name/Organisation	Summary of comments	Initial officer response
		may all be significant material considerations. More detail of proposed Policy WCS10 is required.	
PR26-1653	Mr A and Mrs H Jones	Agree with Energy from waste but not incineration - there are less hazardous alternatives to the environment and to persons health.	The Emerging Preferred Options paper is not technology specific and seeks to allocate land for all kinds of facilities, which could include both thermal treatment and AD facilities. <i>Worcestershire Waste Core Strategy Background Document: Recovering Energy from Waste</i> considers issues relating to both thermal treatment and anaerobic digestion. The Environment Agency is responsible for advising the council on the pollution implications of waste management proposals and will be consulted on both the emerging strategy and any specific proposals.
PR26-1653	Mr A and Mrs H Jones	Incinerators are not the solution! <ul style="list-style-type: none"> • The British Society for ecological medicine recognised significant health effects • The EU recognises risks of contamination of water courses from ash • The comment on page 19 of the Summary of Emerging Preferred Options Consultation document is flawed - there are countless counter arguments from more recent and more authoritative bodies. 	All applications with potentially significant environmental impacts will be required to include an Environmental Impact Assessment. The Environment Agency is responsible for advising the council on the pollution implications of waste management proposals and will be consulted on both the emerging strategy and any specific proposals. Defra's advice is that there is no credible evidence of adverse health outcomes for those living near incinerators (Waste Strategy 2007, p77).
PR27-1652	Mr TJ Harrop	Recycling must be maximised-true residual waste can have energy removed but by better technological solutions than incineration.	Noted. This is the principle behind the waste hierarchy which the Waste Core Strategy seeks to implement. The Emerging Preferred

Reference	Name/Organisation	Summary of comments	Initial officer response
			Options paper is not technology specific and seeks to allocate land for all kinds of facilities, which could include both thermal treatment and AD facilities. <i>Worcestershire Waste Core Strategy Background Document: Recovering Energy from Waste</i> considers issues relating to both thermal treatment and anaerobic digestion.
PR29-1650	Mr S Tranter	Best Energy recovery is via AD it costs less per tonne than incineration. Biogas (Methane) from AD can be stored and use when needed it is a bankable item, there is residue waste which is safer than ash of fly ash.	See above.
PR29-1650	Mr S Tranter	I am very worried about the idea of a thermal treatment plant (incinerator) since this is a one-way burn once approach, you state in Part3 page8 sustainability that we in Worcestershire are using the equivalent of 2.93 planets. We only have the one that 1/3 that means we have to recycle at least 68.3% of any wastes. It really needs to be 85% plus to safeguard future generations.	See above. The Vision for the strategy recognises that we need to prepare for zero-waste to be our long-term goal. The strategy will be monitored annually and revised to meet future recycling targets.
PR29-1650	Mr S Tranter	We don't want a monstrous white elephant (incinerator) which us the rate payers will be paying for years to come. This would not look good for the council who are there to serve the County people/rate payers.	The Waste Core Strategy is not technology specific and does not propose an incinerator. Any such application will be advertised and consulted upon in accordance with the council's Statement of Community Involvement, which is intended to enable local people and statutory and non-statutory consultees to express their views. The decision whether or not to approve any

Reference	Name/Organisation	Summary of comments	Initial officer response
			applications for planning permission is made by the Council as the Local Planning Authority in accordance with National, Regional and Local policy, not as the Waste Disposal Authority. Applications which do not accord with the development plan will be refused, as was the case with the proposed incinerator at Kidderminster.
PR29-1650	Mr S Tranter	Mass burn is against the Stockholm convention in its creation of dangerous organic pollutants.	Noted. All applications with potentially significant environmental impacts will be required to include an Environmental Impact Assessment. The Environment Agency is responsible for advising the council on the pollution implications of waste management proposals and will be consulted on both the emerging strategy and any specific proposals. Defra's advice is that there is no credible evidence of adverse health outcomes for those living near incinerators (Waste Strategy 2007, p77).
PR30-1649	Mr and Mrs C Jones	Energy from Waste but not incineration.	The Emerging Preferred Options paper is not technology specific and seeks to allocate land for all kinds of facilities, which could include both thermal treatment and AD facilities. <i>Worcestershire Waste Core Strategy Background Document: Recovering Energy from Waste</i> considers issues relating to both thermal treatment and anaerobic digestion.
PR32-1648	Mrs G Sanderson	No if incineration is involved. Any form of anaerobic digestion should be encouraged.	See above.

Reference	Name/Organisation	Summary of comments	Initial officer response
PR33-1654	Mr RE Price	<p>There are better alternatives than incineration and landfilling. E.g. anaerobic digestion, energy recovery by biogas which are much more environmentally friendly and do not place such a burden on local communities.</p> <p>Waste Incineration deters recycling and produces pollutants and we should be looking for alternative measures which do not cause pollution and do not cause more harm than good.</p> <p>To build an incinerator in the community is a recognition of the fact that a local authority has failed to dispose of waste in manner which is responsible to local communities and future generations. We should be looking for a long term solution and not a very expensive and harmful quick fix.</p>	<p>See above.</p> <p>Noted. All applications with potentially significant environmental impacts will be required to include an Environmental Impact Assessment. The Environment Agency is responsible for advising the council on the pollution implications of waste management proposals and will be consulted on both the emerging strategy and any specific proposals. Defra's advice is that there is no credible evidence of adverse health outcomes for those living near incinerators (Waste Strategy 2007, p77).</p> <p>The Waste Core Strategy is not technology specific and does not propose an incinerator. Any such application will be advertised and consulted upon in accordance with the council's Statement of Community Involvement, which is intended to enable local people and statutory and non-statutory consultees to express their views. The decision whether or not to approve any applications for planning permission is made by the Council as the Local Planning Authority in accordance with National, Regional and Local policy, not as the Waste</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
			Disposal Authority. Applications which do not accord with the development plan will be refused, as was the case with the proposed incinerator at Kidderminster.
PR35-569	Mrs S Clift, <i>Elmbridge Parish Council</i>	Concern that this would be environmentally damaging and unacceptable on a large scale, to local communities. Would prefer to see greater emphasis on recycling.	Noted. Emphasis on recycling is the principle behind the waste hierarchy which the Waste Core Strategy seeks to implement. The Emerging Preferred Options paper is not technology specific and seeks to allocate land for all kinds of facilities.
PR36-1655	Mrs LM Bryan	A large incinerator plant is in no way flexible - once it is there you are stuck with it and to operate efficiently it would need to be operating 24/7. This would not allow for intended decreases in waste in the long term future. It is most disturbing to learn that the main commercial contractor responsible for the management of waste in Worcestershire for 25 years, appointed by Worcester County Council is Mercia EnviRecover which is a subsidiary of a parent Spanish company which manufactures incinerators. Can the public be reassured that this situation has no bearing on the matters in hand?	Mercia Waste Management is the council's contractor for the implementation of its integrated PFI waste management contract which only deals with municipal solid waste. All other waste management issues will be addressed through the normal competitive operations of the market. The council has two distinct responsibilities, as a waste disposal authority and as a waste planning authority, covered by different statutory regulations and policy requirements. The two elements are conducted quite separately. Any application for planning permission will be determined on its merits, judged on the basis of the Development Plan. A previous application by Mercia Waste for an incinerator (at Kidderminster) was refused planning permission by the council. Other proposals which do not comply with the development plan will similarly be refused.
PR37-1656	Mr C Rogers	Anaerobic digestion.	The Emerging Preferred Options paper is not

Reference	Name/Organisation	Summary of comments	Initial officer response
		Large scale incineration is not suitable as we improve our housekeeping in terms of waste.	technology specific and seeks to allocate land for all kinds of facilities, which could include both thermal treatment and AD facilities. <i>Worcestershire Waste Core Strategy Background Document: Recovering Energy from Waste</i> considers issues relating to both thermal treatment and anaerobic digestion.
PR41-1658 PR44-1680	Mr Meredith & Mr R Meredith	Use of biogas.	Noted.
PR42-1659	Mrs L Meredith	Essential - can get biogas from anaerobic digestion.	Noted.
PR45-1661	S Cook	<p>More emphasis is needed on waste reduction and recycling. Anaerobic digestion could be acceptable but incineration is not.</p> <p>"Energy from waste" cannot be an option - the concerns mentioned are valid and have not been adequately refuted and there are better options - Health; burning recyclables; environmental concerns; toxic by-products.</p>	<p>The Emerging Preferred Options paper is not technology specific and seeks to allocate land for all kinds of facilities, which could include both thermal treatment and AD facilities. <i>Worcestershire Waste Core Strategy Background Document: Recovering Energy from Waste</i> considers issues relating to both thermal treatment and anaerobic digestion. All applications with potentially significant environmental impacts will be required to include an Environmental Impact Assessment. The Environment Agency is responsible for advising the council on the pollution implications of waste management proposals and will be consulted on both the emerging strategy and any specific proposals. Defra's advice is that there is no credible evidence of adverse health outcomes for those living near incinerators (Waste Strategy 2007, p77).</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
PR52-1679	Martin Pollard/Nick Roberts, <i>Axis on Behalf of Mercia Waste Management (MWM)</i>	<p>WCS10 Energy from Waste MWM generally supports the wording of the draft policy direction regarding Energy from Waste and the Company agrees that such a policy should be included in the WCS, particularly given the identified requirement for thermal treatment facilities to manage 250,000tpa of municipal waste within the JMWMS. We strongly recommend that the policy remains non-technology specific as it is essential that prospective developers are unconstrained by facility type in order that they can offer the optimum solution in terms of performance, variability of feedstock, affordability, advances in technology and bankability.</p> <p>It is essential that where the policy requires that the 'sorting of waste is carried out' this recognises that sorting may occur on-site or off-site (i.e. a number of facilities will be developed for the receipt of residual waste where sorting / segregation has occurred already elsewhere). This should be made clear in the reasoned justification to any future policy.</p>	<p>Support noted.</p> <p>Noted, change to be made.</p>
NQ14-796	JR Harris, <i>Friends of the Earth</i>	<p>Wyre Forest Friends of the Earth have examined the County Council's Strategy and rejects the proposals. It is quite clear that the WCS is entirely dependent upon the incineration of excessive quantities of waste. Incineration is an outdated technology that should not be entered into for the time scale envisaged, it produces dioxins, creates serious problems with toxic waste residues and is damaging to the environment. Have you</p>	<p>The Emerging Preferred Options paper is not technology specific and does not propose an incinerator at Hartlebury. It seeks to allocate land for all kinds of facilities, which could include both thermal treatment and AD facilities.</p> <p><i>Worcestershire Waste Core Strategy Background Document: Recovering Energy from Waste</i> considers issues relating to both</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>calculated the level of emissions that will be produced transporting waste from Herefordshire to the proposed site at Hartlebury. Even more serious will be the negative effect on the County Council increasing its levels of recycling. The County Council is seriously at fault and needs to reconsider its position.</p>	<p>thermal treatment and anaerobic digestion. All applications with potentially significant environmental impacts will be required to include an Environmental Impact Assessment. The Environment Agency is responsible for advising the council on the pollution implications of waste management proposals and will be consulted on both the emerging strategy and any specific proposals. DEFRA's advice is that there is no credible evidence of adverse health outcomes for those living near incinerators (Waste Strategy 2007, p77). The reviewed Joint Municipal Waste Management Strategy identifies the need for residual waste treatment, which could be thermal treatment. The Waste Core Strategy will set a framework to assess any proposals which might be made.</p>
NQ22-642	Mr Lawrence McCurrich, <i>Rushock Parish Council</i>	<p>The members of the Council are very strongly of the opinion that any attempt to locate a large incinerator on Hartlebury Trading Estate should be vigorously opposed. The endless smell from the landfill site which we have to endure during the summer months is surely enough for this area. We take the view that better sorting of waste to enable more recycling should be a priority together with a greater amount of composting and biodegradation.</p>	See above.
NQ22-642	Mr Lawrence	The council has no confidence in any assurances	All applications with potentially significant

Reference	Name/Organisation	Summary of comments	Initial officer response
	McCurrich, <i>Rushock Parish Council</i>	about the nature of the fumes and fall out from a huge incinerator and is most concerned about potential damage to the large urban and rural populations which would be affected by such emissions. The same fears would also apply to the arable and grassland farming in the area as well as all wildlife. The sight and sound of the incinerator would be a round the clock irritation to all our inhabitants, as would the extra traffic on our roads as material is brought in from all over this county as well as from Herefordshire. We understand that there is new technology being developed, such as anaerobic digestion, which could deal with a significant quantity of the non-recyclable waste. Major investment in a massive plant will make it difficult to adopt these new technologies. We feel it would be useful if much better information could be presented on alternative methods other than incineration.	environmental impacts will be required to include an Environmental Impact Assessment. The Environment Agency is responsible for advising the council on the pollution implications of waste management proposals and will be consulted on both the emerging strategy and any specific proposals. DEFRA's advice is that there is no credible evidence of adverse health outcomes for those living near incinerators (Waste Strategy 2007, p77).
NQ23-818	Miss V Kendrick, <i>CPRE Redditch Group</i>	Agree.	Noted.
NQ29-1162	Cat Ainsworth, <i>Worcestershire Partnership Climate Change Theme Group</i>	Energy from Waste: A fine balance must be made between strategies that include a focus on the creation of energy for waste and strategies that encourage waste minimisation. Ideally, processed and cooked food waste should be minimised and garden and kitchen waste composted by householders (p48; WCS10).	Noted.
OQ11-1689	Dr A Judge	Energy recovery is important, but it should be based on anaerobic digestion and biogas recovery and NOT on incineration. Residual	The Emerging Preferred Options paper is not technology specific and seeks to allocate land for all kinds of facilities, which could include

Reference	Name/Organisation	Summary of comments	Initial officer response
		waste could be reduced by 100,000 tons p.a. through sorting of black bag waste, followed by anaerobic digestion of sorted organic waste.	both thermal treatment and AD facilities. <i>Worcestershire Waste Core Strategy Background Document: Recovering Energy from Waste</i> considers issues relating to both thermal treatment and anaerobic digestion. The reviewed Joint Municipal Waste Management Strategy aims to reduce the increase in Municipal Waste and promote recycling. The Waste Core Strategy will enable the necessary facilities to be developed.
OQ15-1668	N and K Dowty	EFW emits pollutants and toxic chemicals into the atmosphere. Although the emissions are controlled by the Environment Agency, in many cases the particles are only measure once or twice per year. Renewable energy e.g wind or water should be considered. Black bin rubbish must be sorted thoroughly and therefore resultant residual waste does not justify EFW's.	See above. All applications with potentially significant environmental impacts will be required to include an Environmental Impact Assessment. The Environment Agency is responsible for advising the council on the pollution implications of waste management proposals and will be consulted on both the emerging strategy and any specific proposals, it also has a statutory duty to monitor such sites. It is government policy that planning authorities must assume that this is carried out properly. DEFRA's advice is that there is no credible evidence of adverse health outcomes for those living near incinerators (Waste Strategy 2007, p77).
OQ19-1671	Mr R Archard	WCS10 Energy from non-incinerating plant would be acceptable. The report denies existing evidence that incinerators are harmful to health when there are numerous studies of downwind populations showing serious adverse effects on	See above.

Reference	Name/Organisation	Summary of comments	Initial officer response
		health.	
OQ21-670	Councillor Dawn Merriman <i>Warndon Parish Council</i>	We are not knowledgeable enough on the subject to know if capacity quoted is sufficient for future needs- but agree in principle.	Noted.
OQ24-1674	Mr P Townley	The concept is fine but needs to stress that processes must not contribute unnecessarily to CO2 emission eg: 1tonne of MSW incinerated gives 1tonne of CO2!	Noted. The council is a Beacon authority for climate change issues and we will monitor developments to assess whether this concept can be included in this the Waste Core Strategy or any future revisions.
OQ25-1675	Mr M Harvey	Biogas from A.D. is more efficient and a green technology! Incineration is not green or efficient. Some plastics take many times the energy to burn than the energy that is recovered.	Noted.
OQ15-1668	N and K Dowty	After recycling there is sufficient "Residual" waste to justify incineration (EFW). Incineration discourages recycling as Council's are locked into a 25 year contract and have to provide the incinerator with a guaranteed volume of waste every year. This in turn means that councils will have to supply unsorted black bin waste or commercial & industrial to incineration. Using the information in the strategy document, 46% of MSW is organic and could be dealt with via anaerobic digestion and another 28% consists of materials which could be recycled e.g glass. The by products of incineration will still have to go to landfill, whereas with other cheaper, cleaner, greener, methods they can be used in other ways, e.g fertiliser.	The Emerging Preferred Options paper is not technology specific and seeks to allocate land for all kinds of facilities, which could include both thermal treatment and AD facilities. <i>Worcestershire Waste Core Strategy Background Document: Recovering Energy from Waste</i> considers issues relating to both thermal treatment and anaerobic digestion. The reviewed Joint Municipal Waste Management Strategy aims to reduce the increase in Municipal Waste and promote recycling. The Waste Core Strategy will enable the necessary facilities to be developed.
OQ24-1674	Mr P Townley	Some of my comments apply equally to the JMWMS: These are Rural Counties not	See above. All applications with potentially significant

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>Metropolitan Boroughs or Areas. The sorts of solutions that might work in Birmingham or London may not be appropriate here. I understand the need for Thermal Treatment, however a single large EfW plant serving both counties is inappropriate for the following reasons</p> <ul style="list-style-type: none"> • carbon miles of transporting bulked waste across two counties, it is against the 'proximity principle' of dealing with waste close to source, after treatment the waste is reduced by 90% of its original mass - final transportation to its final disposal would require only 10% of the transport needed prior to treatment, reducing 'carbon footprint' and retaining more of the 'carbon offset'. • Flexibility and the need to respond to change would be better met by a number of smaller thermal treatment plants. Some technologies are modular, scaleable and flexible in capacity. Plant producing BioEthanol, Syngas, or RFD allow the choice of when, where, and how the fuel products are used, Thermal Treatment choices should be 'C','D','F' and/or Gasification or Pyrolysis. Incineration is a "last resort" technology • 1tonne of MSW burnt emits 1tonne of CO2, - very inefficient as a power generator - with its two-stage heat/steam process, -locked into needing to run at full 	<p>environmental impacts will be required to include an Environmental Impact Assessment. This will normally include a transport assessment and must include discussion of the alternatives considered.</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>capacity - or not at all. This is very inflexible, particularly if it is just one very large unit.</p> <p>Note: the support doc 'waste arising' - not available from WCS site!</p>	<p>The <i>Waste Arisings</i> background document is now available on our website www.worcestershire.gov.uk/wcs, please contact us if you have any further problems accessing it.</p>
OQ27-1677	Mr M Harris	<p>The use of incineration is old technology and there would appear to be more environmentally friendly ways of now managing waste and ensuring that there is a greener footprint. For instance bringing waste from South Herefordshire to a proposed incinerator in Hartlebury is not acceptable and polluting the locality is simply wrong. Smaller, more local, more eco friendly solutions are available in the form of recycling/bio digesters.</p>	<p>The Emerging Preferred Options paper is not technology specific and does not propose an incinerator at Hartlebury. It seeks to allocate land for all kinds of facilities, which could include both thermal treatment and AD facilities.</p> <p><i>Worcestershire Waste Core Strategy Background Document: Recovering Energy from Waste</i> considers issues relating to both thermal treatment and anaerobic digestion. All applications with potentially significant environmental impacts will be required to include an Environmental Impact Assessment.</p>

WCS11: Managing the Impact of Waste Management Related Development

Reference	Name/Organisation	Summary of comments	Initial officer response
NQ13-1624	<i>Wyre Forest District Council</i>	<p>Consider that this is a useful policy to include and reference should explicitly be made to the types of features that need protection such as AONB's, SSSI's and designated Wildlife Sites.</p>	<p>Support noted, change to be made.</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
		Reference should also be made to any Air Quality Management Areas that exist throughout the County.	Reference will be made to Air Quality Management Areas.
NQ16-719	Hilary Berry, <i>Environment Agency</i>	There is a need to promote Life Cycle Assessment in the selection of waste management options and also in the selection of appropriate waste management sites. The carbon footprint of all potential new waste management facilities should be captured, including carbon costs of constructing the facility, carbon cost (energy) of the operation of the facility and carbon costs of transport associated with the site (e.g. movements of waste to or from the site) over the time period of the plan. Carbon footprinting could be calculated by Life Cycle Assessment or a similar method and developers should be responsible for calculating this. This would also act as an aid in the selection of appropriate sites for new waste management facilities and also as a way of helping to determine the most sustainable waste management option at a specific site.	Noted. We will explore this issue further with the Environment Agency but we intend to develop policies which address these matters rather than apply a formal life-cycle assessment because we do not believe it would be enforceable.
PR25-681 PR49-1623	Ivor Pumfrey, <i>Malvern Hills District Council</i> & Andrew Ford, <i>Wychavon District Council</i>	We support the proposed policy as this will help to avoid challenges over the soundness of the Strategy. We consider the list of factors that make the policy “locally distinctive” is helpful and particularly support alignment with the Herefordshire and Worcestershire Air Quality Strategy given that the majority of waste moves by road. It is suggested that the application of this	Support noted.

Reference	Name/Organisation	Summary of comments	Initial officer response
		policy be linked to the size of the proposed development to avoid potentially disproportionate obstacles to delivering minor but locally important facilities.	
PR25-681 PR49-1623	Ivor Pumfrey, <i>Malvern Hills District Council</i> & Andrew Ford, <i>Wychavon District Council</i>	With respect to other considerations such protection of SSSI, AONB, Landscape Character etc there is no objection in principle to such references within the document where they provide guidance to users of the document. However, there is no need to develop additional policy where existing policy protection exists or there is protection established by virtue of their designation.	Noted and agreed.
PR52-1679	Martin Pollard/Nick Roberts, <i>Axis on Behalf of Mercia Waste Management (MWM)</i>	Managing the Impact of Waste Management Related Development. MWM agree that the plan should contain a policy which seeks to ensure that waste development does not result in adverse impacts upon the County's environment. However, the Council should avoid a policy that effectively lists a series of environmental and amenity considerations, the protection of which is already effectively covered by other national, regional and local policies.	Noted and agreed. GOWM's advice will be sought to clarify the criteria expressed.
NQ23-818	Miss V Kendrick, <i>CPRE Redditch Group</i>	Agree: policies to protect local features, designated sites and areas, and matters of local concern. Agree also that "local distinctiveness" be preserved according to national policy.	Support noted.
NQ25-672	A Brodrick, <i>White Ladies Aston Parish Meeting</i>	Endorse the concerns to ensure the minimisation of impact created by waste management development.	Support noted.
NQ30-716	Amanda Smith <i>English</i>	The national policy context for the historic	Noted, change to be made to recognise the

Reference	Name/Organisation	Summary of comments	Initial officer response
	<i>Heritage (West Midlands)</i>	environment is currently set by PPG15 and PPG16, although the draft PPS15 Planning for the Historic Environment is also relevant in demonstrating the direction of travel of Government guidance and the importance of the conservation, enhancement and enjoyment of the historic environment as a core Government objective.	importance of the conservation, enhancement and enjoyment of the historic environment as a core Government objective.
OQ13-1667	Mr A Murcott	What about Hartlebury Common. It is referred to, on the Visit Britain website as a Site of Special Scientific Interest (SSSI) and Worcestershire's most important and largest remaining heathland area. It should therefore be included amongst those areas to be protected.	Noted, change to be made to recognise the protection of SSSIs.
OQ22-1081	Steven Bloomfield, <i>Worcestershire Wildlife Trust</i>	Should also make mention of Special Wildlife Sites so as to capture locally important features as well as those with national designations.	Noted, change to be made.
OQ20-1672	Mrs M and Mr Phillips	This report appears to shun the idea that there would be any "Adverse health outcomes for those living near incinerators" (page 19 bottom paragraph) The biggest concern for residents is the impact that waste incineration will have on everyone living within the proximity and surrounding area. The greatest concerns are the long term effects of the incineration emissions to the developing embryo and infant, effects that would have a real possibility of being passed on genetically to succeeding generations. Far greater vulnerability to toxins is documented for the very young (we have two schools in the village), particularly foetuses, causing cancer,	Noted. All applications with potentially significant environmental impacts will be required to include an Environmental Impact Assessment. The Environment Agency is responsible for advising the council on the pollution implications of waste management proposals and will be consulted on both the emerging strategy and any specific proposals, it also has a statutory duty to monitor such sites. It is government policy that planning authorities must assume that this is carried out properly. Defra's advice is that there is no credible evidence of adverse health outcomes for those living near incinerators (Waste

Reference	Name/Organisation	Summary of comments	Initial officer response
		spontaneous abortion, birth defects the list goes on. A worrying high body burden of pollutants has recently been reported in two studies of cord blood from new born babies. In short I would not feel it safe to be enjoying sitting in my garden with my family on a summers day with the thought that the local incinerator some 5 minutes walk away was pumping out fine particulate pollution emissions which would affect their health. Waste incineration is unjust because of its maximum toxic impact on the most vulnerable members of our society. It contravenes the UN Commission on Human Rights, the European Human Rights Convention (the right to life), and the Stockholm Convention, and violates the Environmental Protection Act of 1990 which states that the UK must prevent emissions from harming human health.	Strategy 2007, p77).

General Comments on Q6

Reference	Name/Organisation	Summary of comments	Initial officer response
PR21-695	David Ingleby <i>Gloucestershire County Council</i>	Yes - in line with PPS12 and PPS10 and advice from Government Office	Support noted.
PR24-1645	Mrs L Brookes	Sort waste properly-why is it only Wychavon who recycles food waste.	The County Council is the statutory waste disposal authority, waste collection is the responsibility of the District Councils. Wychavon is the only council which has chosen to collect food waste at present. The

Reference	Name/Organisation	Summary of comments	Initial officer response
			issue is likely to be further explored in future revisions of the reviewed Joint Municipal Waste Management Strategy.
PR33-1654	Mr RE Price	We should ensure greater recycling and sorting of waste and must protect the greenbelt and local plans.	Emphasis on recycling is the principle behind the waste hierarchy which the Waste Core Strategy seeks to implement. When completed the Waste Core Strategy will form part of the local development framework. This will be used alongside District and Borough Core Strategies (which will replace the old 'local plan' and 'structure plan' policies) to provide the planning policies against which applications for waste management will be judged. We intend to comply with national policy regarding the use of green belt, which limits the kind of uses that will be permitted.
PR33-1654	Mr RE Price	There should be a move away from incineration and landfilling.	It is government policy that the Waste Core Strategy should implement the waste hierarchy, which seeks to do just this, and to encourage the minimisation, reuse and recycling of waste.
PR41-1658 PR44-1680	Mr Meredith & Mr R Meredith	Sorting of waste to enable anaerobic digestion, sustainable biogas, use of correct land 'not greenbelt'.	The Emerging Preferred Options paper is not technology specific and seeks to allocate land for all kinds of facilities, which could include both thermal treatment and AD facilities. <i>Worcestershire Waste Core Strategy Background Document: Recovering Energy from Waste</i> considers issues relating to both thermal treatment and anaerobic digestion. We intend to comply with national policy

Reference	Name/Organisation	Summary of comments	Initial officer response
			regarding the use of green belt, which limits the kind of uses that will be permitted.
PR47-662	Mrs P Buckley, <i>Tenbury Town Council</i>	Too vague.	Noted, policy wording to be developed further.
NQ30-716	Amanda Smith <i>English Heritage (West Midlands)</i>	<p>With respect to the detail of suggested policy content, we acknowledge the need to develop a locally distinctive policy and the general approach of linking the policy to locally derived policy documents, strategies and assessments seems a valid approach. In terms of the historic environment, however, we consider that more detail is required and suggest the following should be incorporated into the policy:</p> <ul style="list-style-type: none"> • the Worcestershire Historic Landscape Characterisation and Historic Environment Character Assessments. (The HLC is currently in progress across the county and will serve to complement the existing Landscape Character Assessment. Additionally the county has prepared a Historic Environment Character Assessment of the South Worcestershire Area and is looking to extend this to the remaining areas of the County. For further information please contact: Stephen Crowther); • the Worcestershire Historic Environment Record; • the Worcestershire Historic Farmsteads and Landscape County Report and relevant National Character Area 	Noted, change to be made.

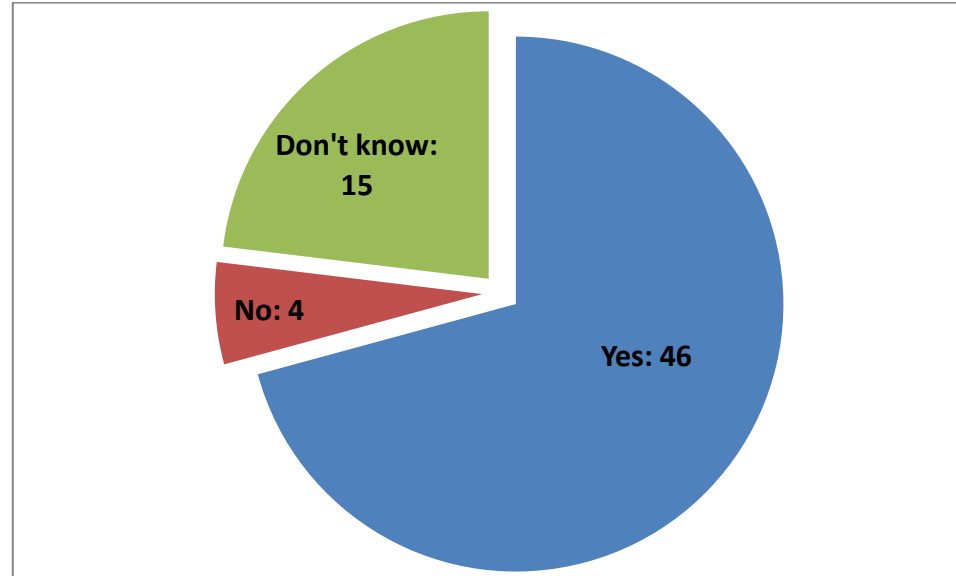
Reference	Name/Organisation	Summary of comments	Initial officer response
		Statements (this is a county wide survey of historic farmsteads which will provide a better understanding of the County's resource of historic farmsteads and their sensitivity and capacity to change. Further information - Adam Mindykowski)	
NQ31-682	Louise Brockett, <i>Redditch Borough Council</i>	Officers consider that it would be helpful to develop Preferred Options that include policies addressing all of the detailed issues.	Noted, the issues will be further discussed with the District Councils and specialist consultees. The council does not, however, intend to undertake a formal preferred options consultation at this stage.
NQ37-741(L)	Mike Price, <i>Government Office for West Midlands</i>	You recognise that national/regional policies should not be repeated which is good.	Support noted.
NQ37-741(L)	Mike Price, <i>Government Office for West Midlands</i>	You will need to look closely at which policies are setting out the strategy itself and which are criteria based policies which will be used in determining planning applications. It would be useful to define "strategic". It would be useful to discuss emerging policies during the next stages of the Core Strategy preparation. Waste Audit: with regard to this proposal it would be worth clarifying the relationship with the District's Core strategies and their role in implementation.	Noted. Issues to be discussed further with GOWM.
OQ2-132	Mr R Reames, E.ON Energy-from-Waste (UK) limited	Consider an "out-of-county" solution by sending waste to a plant elsewhere.	Noted, the strategy will be based on the concept of a capacity gap and there is no intention to limit the number of facilities provided subject to the concept of equivalent self-sufficiency for Worcestershire. The strategy will be monitored annually and

Reference	Name/Organisation	Summary of comments	Initial officer response
			reviewed if there is evidence of insufficient capacity. We recognise, however, that cross-boundary movements of waste are inevitable where economies of scale are significant considerations.
OQ7-1444	Mr P Morgan	The planned energy from waste facility at Hartlebury is not environmentally sustainable and therefore this should not be adopted at all until proven further or changed.	The Emerging Preferred Options paper is not technology specific and does not propose an incinerator at Hartlebury. It seeks to allocate land for all kinds of facilities, which could include both thermal treatment and AD facilities.
OQ23-1673	Tony Jauncey	The areas specified may not be in agreement with local people/policy There are all sorts of energy from waste, some of it not all that welcome, but in general the processes need to meet the green issues.	See above. All applications will be advertised and consulted upon in accordance with the council's Statement of Community Involvement, which is intended to enable local people and statutory and non-statutory consultees to express their views. The decision whether or not to approve any applications for planning permission is made by the Council as the Local Planning Authority in accordance with National, Regional and Local policy, not as the Waste Disposal Authority. Applications which do not accord with the development plan will be refused, as was the case with the proposed incinerator at Kidderminster.
OQ25-1675	Mr M Harvey	Maximisation of recycling should be the prime goal and intelligent use of resources.	It is government policy that the Waste Core Strategy should implement the waste hierarchy, which seeks to do just this, and to encourage the minimisation, reuse and recycling of waste.

Reference	Name/Organisation	Summary of comments	Initial officer response
OQ30-1684	Seskco3 (email address)	More involvement with stakeholders in proposed locality.	All applications will be advertised and consulted upon in accordance with the council's Statement of Community Involvement, which is intended to enable local people and statutory and non-statutory consultees to express their views. The decision whether or not to approve any applications for planning permission is made by the Council as the Local Planning Authority in accordance with National, Regional and Local policy, not as the Waste Disposal Authority. Applications which do not accord with the development plan will be refused, as was the case with the proposed incinerator at Kidderminster.

Question 7

Do you think that the indicator set could be useful for monitoring?



If no, please could you explain why and suggest alternatives or additions.

Reference	Name/Organisation	Summary of comments	Initial officer response
NQ9-817	Frank Hill, <i>Campaign to Protect Rural England</i>	Page 10: Ensuring Sustainable Development: Again we question how the Council can 'monitor' the impact of waste management on climate change.	The council is a Beacon authority for climate change issues. At present we intend to use national indicators (NI185 and NI186) and we will monitor developments to assess how other criteria can be included the Waste Core Strategy.
NQ13-1624	<i>Wyre Forest District Council</i>	It would be useful to include contingency planning indicators so that if the Strategy is not being realised then actions can be taken.	Agreed, concept under development.
PR25-681 PR49-1623	Ivor Pumfrey, <i>Malvern Hills District Council</i> & Andrew Ford, <i>Wychavon District Council</i>	Whilst the proposed monitoring indicators appear logical the value and reliability of some must be questioned given the comments made within the report about the consistency and veracity of data from some of the proposed sources. We would strongly advise against the use of indicators for which consistent, robust and reliable data is not available as this may lead to future challenges of decisions arising from the use of such data.	Noted. Defra is currently trying to improve the accuracy of data. We will use the best information available.
PR39-1657	Tom Beard, <i>Ecohomonic Solutions Ltd, Heartfood, Worcester Greenpeace, Transition Foods</i>	Agree - the indicators that say "compliant to policy"	Noted.
PR43-639	Dr I Fertin, <i>Far Forest Councillor</i>	Amount - Flytipping	Noted, we will research to see if an indicator regarding flytipping can be included.
PR48-1622	Lindsay Wood, <i>Worcester City Council</i>	Also, could you monitor how much waste is kept and/or recycled on a site compared to that taken off site?	At present this is not possible.
PR52-1679	Martin Pollard/Nick Roberts, <i>Axis on</i>	Whilst the monitoring will include a review of consented waste management capacity	Noted. New waste management capacity implemented is currently one of the national

Reference	Name/Organisation	Summary of comments	Initial officer response
	<i>Behalf of Mercia Waste Management (MWM)</i>	as a means of monitoring future requirements to meet the waste 'capacity gap', MWM consider that this should be extended to include the number of permissions that have actually been implemented. In MWM's experience the majority of waste planning permissions are never implemented (e.g. the Estech Autoclave facility at Hartlebury Trading Estate). The monitoring should take into account both permissions granted and implemented as it will provide a more realistic measure as to the County's progress in meeting the 'capacity gap'.	indicators reported in the AMR. The issue of unimplemented permissions is referred to in PPS10 and we intend to continue to explore if and how unimplemented permissions can be monitored and taken into account in developing the Waste Core Strategy.
NQ37-741(L)	Mike Price, <i>Government Office for West Midlands</i>	A delivery plan needs to be developed before Publication and this need to be linked to monitoring.	Agreed, change to be made.
OQ6-1666 OQ7-1444	Mrs E Morgan & Mr P Morgan	The indicators themselves are not worthwhile. What MUST also be adopted is a carbon neutral or carbon negative balance for all these facilities and processes - so for each means there needs to be shown the carbon/CO2 positive or negative overall effects (including the amount of transportation and waste handling required) for each facility or process. In this way the best environmental processes are visible.	Noted. It would not be in accordance with current national policy in Planning Policy Statement 10 (PPS10) to require this at present.
OQ14-1683	R Wlckens	Toxic gases.	The Environment Agency performs the pollution control function in relation to waste management and would consider this issue in relation to individual facilities where relevant.
OQ30-1684	Seskco3 (email address)	Response depends on the question format.	Noted. Further advice will be sought from the Council's Research and Intelligence section to clarify how future questions should be best

Reference	Name/Organisation	Summary of comments	Initial officer response
			expressed.

Any other comments

This section includes any other comments made on the questionnaire and those responses received in other formats.

Reference	Name/Organisation	Summary of comments	Initial officer response
General comments on the consultation document			
NQ9-817	Frank Hill, <i>Campaign to Protect Rural England</i>	Overall the Proposals are practical and positive and we support the board strategy.	Support noted.
NQ9-817	Frank Hill, <i>Campaign to Protect Rural England</i>	We support the other WCSs (see separate comments on WCS2, 5 and 9).	Support noted.
NQ10-908	Peter Luff, <i>MP</i>	<p>Having an ambitious yet coherent strategy for waste management is undoubtedly one of the most pressing concerns for the council and I commend the work done by the team who have produced this set of proposals.</p> <p>However, I cannot fully endorse its conclusions. I understand that the serious budgetary constraints of the next few years and the implications of the landfill tax will, to some extent, dictate waste policy. Within these financial limits</p>	<p>Support noted.</p> <p>Noted.</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
		however, we should be pushing unashamedly progressive, adaptable and environmentally sustainable approach for Worcestershire.	
NQ10-908	Peter Luff, <i>MP</i>	<p>The provisions that are implemented at this stage - if only because of the capital investment that is made - will inevitably have long-term repercussions. As a community in Worcestershire, we have an obligation to improve the efficiency of our waste management model in the medium and long term, recycling as much as we can so that we burn or landfill the least amount of material possible.</p> <p>With this in mind, I am concerned that the core strategy is restricting its scope for finding truly environmentally sustainable solutions by not fully exploring the possibilities of advanced recycling. Investment in short term solutions to waste management issues - like large scale incineration - must not preclude options such as anaerobic digestion. I am not clear what consideration the council has given this technology.</p>	<p>The background documents prepared to inform the emerging Preferred Options report consider a range of treatment options including anaerobic digestion, large scale incineration and advanced technologies such as a MBT, MHT, autoclave and pyrolysis. See in particular <i>Types of Waste Management Facilities and Recovering Energy from Waste: Thermal and Biological Treatment technologies</i>.</p> <p>The policy proposals set out in the emerging preferred options consultation favour other treatment methods to landfill, but beyond this they are technology neutral. The approach does not preclude options such as anaerobic digestion and question 2 (page 38) sets out suggested provision for anaerobic digestion, amongst other treatment methods and asks whether this provision is appropriate.</p>
NQ10-908	Peter Luff, <i>MP</i>	We should be developing solutions with the aim of recycling and composting well over 50% of our waste. I understand that mechanical biological treatment (MBT) technology can be used to maximise the removal of any recyclable materials remaining in the waste stream, including plastics. What consideration has the council given to this?	The Waste Core Strategy aims to move waste up the waste hierarchy. The Emerging Preferred Options paper is not technology specific and seeks to allocate land for all kinds of facilities. We have considered the implications of MBT in the background document <i>Types of Facilities</i> , however the development of particular waste management

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			proposals will be market led.
NQ10-908	Peter Luff, <i>MP</i>	I conclude that a more progressive waste management strategy would deliver long-term environmental benefits and strongly recommend the adoption of the alternative technologies that would deliver such an outcome.	<p>The policy proposals set out in the emerging preferred options consultation favour other treatment methods to landfill, but beyond this they are technology neutral.</p> <p>We propose to set out criteria against which all proposals for waste management facilities will be assessed. This will allow alternative technologies to be brought forwards as they develop.</p>
NQ16-719	Hilary Berry, <i>Environment Agency</i>	Overall the document appears to be comprehensive, identifying, acknowledging and supporting the National and Regional approaches to waste management planning. However at this stage we note that the policies are varied in presentation with some being fairly detailed while others seek more guidance and input.	Noted. Change to be made to clarify policies.
PR36-1655	Mrs LM Bryan	The report throughout maintains an environmentally sympathetic approach and emphasises the importance of minimising the impact of waste management on the environment. The following quotes are examples "flexibility is a major consideration", "development proposals should not have a significant adverse impact on the countryside", "to enhance the Worcestershire Countryside", "RSS seeks to reduce transportation of waste by road", not create pollution, damage natural assets or affect health", "the need to reduce and mitigate the causes of climate change". The above statements are very	The Emerging Preferred Options paper is not technology specific and seeks to allocate land for all kinds of facilities. All applications with potentially significant environmental impacts will be required to include an Environmental Impact Assessment. The Environment Agency is responsible for advising the council on the pollution implications of waste management proposals and will be consulted on both the emerging strategy and any specific proposals, it also has a statutory duty to monitor such sites. It is government policy that planning authorities must assume that

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		<p>reassuring but then the Report states in various sections that Thermal Treatment - Incineration is considered an acceptable, viable and sustainable method of waste management. The construction of an incinerator capable of dealing with up to 250,000 tonnes of waste p.a. is in direct conflict with the above criteria and I fail to see how this form of waste disposal can be considered appropriate when it clearly does not satisfy any of the above.</p>	<p>this is carried out properly.</p>
PR36-1655	Mrs LM Bryan	<p>Whilst reading the report I was impressed by the common-sense approach and the language used although I did find some of the statistics difficult to follow and there were some inconsistencies. The report conveys an environmentally sympathetic yet realistic attitude to waste disposal. It is therefore difficult to comprehend why, in direct conflict to the aforementioned it seemed to be assumed and accepted that thermal treatment ie incineration is a suitable form of waste disposal at the expense of other, more environmentally-friendly and efficient methods. The use of Thermal waste treatment (incineration) seems to contradict all the policies and aims in the report and yet it is being included in the recommendations and taken for granted as an appropriate method.</p>	<p>See above.</p>
PR52-1679	<p>Martin Pollard/Nick Roberts, <i>Axis on Behalf of Mercia Waste Management</i></p>	<p>MWM generally supports the policies and principles of the emerging Waste Core strategy. The document and its associated background papers are very comprehensive in scope and well</p>	<p>Support noted.</p>

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	(MWM)	<p>presented.</p> <p>Whilst the company does generally support the emerging strategy in their role as the authority's long-term contractor they feel obligated to respond to all of the relevant questions contained within the Core Strategy Questionnaire and specifically those relating to municipal waste management. In addition, the company has also made a number of general comments regarding the emerging strategy and a number of the background technical papers that have informed its preparation.</p> <p>Page 37 – 50 – Draft Policy Direction – The supporting text to each of the draft policies indicates that comments on the wording of the emerging policy should be made in response to Q7 of the questionnaire, it should be Q6.</p>	Noted.
NQ24-1276	Vaughan Welch, <i>The Inland Waterways Association, West Midlands Region.</i>	In general IWA considers it a well written policy document and welcomes the proposals to reduce the haulage of waste around the country and deal with it more locally in more environmentally friendly ways. This will reduce the considerable atmospheric pollution that has damaged the Avon Valley due to the continual haulage at the Hill and Moor over the last few years. However, we are concerned to note that while there is an emphasis on the reduction of environmental damage by disposing the waste in more acceptable ways there appears to be no consideration to use of environmental forms of transport when it does	Noted. Movement of waste by rail and water is currently under consideration.

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		need to be moved.	
NQ25-672	A Brodrick, <i>White Ladies Aston Parish Meeting</i>	<p>Having only read the summary we would like to comment accordingly. We endorse the sentiments expressed in your Introduction as well as those points and statements set out in the Vision and Objectives chapter.</p> <p>We are pleased to note there is active enthusiasm for the need to keep reassessing waste requirements as well as assuring the reader the need for flexibility.</p>	Support noted.
NQ25-672	A Brodrick, <i>White Ladies Aston Parish Meeting</i>	We note that whatever decisions are made the priority will always be the care for human health and the environment. These are encouraging sentiments.	Support noted.
NQ25-672	A Brodrick, <i>White Ladies Aston Parish Meeting</i>	Studying the maps has raised the question as to where waste sites are situated on the Gloucester, Warwickshire, Hereford and West Midlands boundaries. This would certainly have an influence on the proximity principle.	Noted, change to be made.
NQ25-672	A Brodrick, <i>White Ladies Aston Parish Meeting</i>	It would also be useful to know how much waste is being transported into and out of Worcestershire. We are sure that these figures have been taken into account as they will continue to influence the number of new sites required by Worcestershire. How much waste is transported for specialist treatment? It would appear that Worcestershire does not have the appropriate facilities for certain treatment processes. How much waste is transported into Worcestershire for specialist treatment or landfill?	Noted, these issues are considered in the background document <i>Waste Arisings</i> . However, we acknowledge that the current data is poor. Defra and the Environment Agency are working to improve this. The strategy will be monitored annually and reviewed to take account of changes. The Waste Core Strategy will recognise the need for cross-boundary co-operation, however it is inevitable that economies of scale mean that some wastes will be

Reference	Name/Organisation	Summary of comments	Initial officer response
			imported and exported into and out of the county. The strategy will seek to minimise this and will be based upon achieving equivalent self-sufficiency in waste management capacity.
NQ27-1127	Mark Pearce, <i>Advantage West Midlands</i>	In December 2008 the Agency responded positively to the original consultation on the Core Strategy - Issues and Options report. The Agency welcomes the emerging preferred options, which set out the policy framework for Worcestershire to manage its waste between now and 2027. They will ensure that there are sufficient opportunities for new waste management facilities of the right type, in the right place and at the right time to deal with the waste produced in Worcestershire.	Support noted.
NQ27-1127	Mark Pearce, <i>Advantage West Midlands</i>	The document responds positively in assisting in the delivery of the WMES. It will align with strategic objectives 1.4, 2.3 and 2.4, which focus on ways to capitalise on sustainable and low-carbon opportunities. This document has the potential to deliver and stimulate the low-carbon agenda by exploiting new markets and ways of working and the document recognises the need to make the maximum use of the region's physical resources, to manage the impacts of climate change. There is further alignment with strategic objective 3.1, which encourages people at home and at work to shift choices and patterns of consumption, procurement and travel and take advantage of goods and services that are sustainable into the long term.	Support noted.

Reference	Name/Organisation	Summary of comments	Initial officer response
NQ27-1127	Mark Pearce, <i>Advantage West Midlands</i>	A recent study commissioned by the Agency forecasts a waste infrastructure capacity gap in the region of 3.7 million tonnes by 2021; this document has the potential to add capacity to the waste infrastructure in the West Midlands region, in particular in the Worcestershire sub-region.	Noted. The council will take account of future research by AWM and the WMRTAB in further developing and monitoring the strategy.
NQ29-1162	Cat Ainsworth, <i>Worcestershire Partnership Climate Change Theme Group.</i>	The Worcestershire Partnership Climate Change Task Group considered the Waste Core Strategy at its last meeting. The Group is broadly in agreement with many of the recommendations proposed in the consultation document. It is appreciated that the strategy takes into consideration the Partnership's climate change strategy.	Noted.
NQ29-1162	Cat Ainsworth, <i>Worcestershire Partnership Climate Change Theme Group.</i>	More attention should be given to addressing the Local Area Agreement target NI188 (adapting to climate change). NI188 is an unusual indicator. It is a process that should ensure that core strategies take climate change into consideration, for example, extreme weather events. It is recognised that climate change will have important consequences for the ways in which waste is stored and handled.	Noted, change to be made to indicators to refer to NIs and specifically if NI188 can be used.
NQ37-741(L)	Mike Price, <i>Government Office for West Midlands</i>	The waste core strategy should be the key policy guidance for dealing with waste and should not simply be a checklist for dealing with applications. We note that the document contains a clear statement of what the final version will contain and it is good to see that links are being made with the Sustainable Community Strategy, the JMWMS and the LAA. Figure 4 is useful in this	Noted.

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		respect.	
NQ37-741(L)	Mike Price, <i>Government Office for West Midlands</i>	You recognise that climate change is important. This should be regarded as a cross-cutting issue in the Waste Core Strategy.	Noted, issue to be explored further.
NQ37-741(L)	Mike Price, <i>Government Office for West Midlands</i>	It is good to see the links with the growth proposals of the RSS and the emerging Core Strategies being made.	Noted.
NQ37-741(L)	Mike Price, <i>Government Office for West Midlands</i>	We note that the emerging Waste Core Strategy may rely on existing locations and capacity.	Noted.
NQ37-741(L)	Mike Price, <i>Government Office for West Midlands</i>	We agree that the strategy should not be over-prescriptive and the approach in identifying areas/general locations, with criteria is appropriate.	Noted.
OQ6-1666 OQ7-1444	Mrs E Morgan & Mr P Morgan	The Emerging Preferred Options Report is not believable. The report contains lots of good ideals and good statements - but similar good ideals and statements were contained in previous documents and the council have ignored these and just gone ahead with environmentally damaging facilities at will, without adequate regard to the community. The report does not explain properly and adequately explain what the council plans to do or where it plans to do it - and this is a fundamental flaw. The council have been involved in these developments for many, many years and by now it MUST have firm views on what it intends to do. If it does not this must represent gross incompetence by the council. Each option must be considered against an environmental and financial score which will	Noted. We intend to develop a key diagram which will indicate the broad areas which are considered as suitable for waste management activities. The strategy accompanied by a Sustainability Appraisal which includes this kind of matrix. All applications will be advertised and consulted upon in accordance with the council's Statement of Community Involvement, which is intended to enable local people and statutory and non-statutory consultees to express their views. The decision whether or not to approve any applications for planning permission is made by the Council as the Local Planning Authority in accordance with National,

Reference	Name/Organisation	Summary of comments	Initial officer response
		demonstrate to the public generally that any chosen option is the best. For this reason a matrix of all factors affecting the choice of any decision for any facility and/or process must be made part of this report and must be made part of the public process before decisions are made.	Regional and Local policy, not as the Waste Disposal Authority. Applications which do not accord with the development plan will be refused, as was the case with the proposed incinerator at Kidderminster.
OQ8-555	Mr B Pound, <i>Clifton upon Teme Parish Council</i>	A scientific approach to development of new and emerging technologies should be adopted.	The development of technologies is beyond the remit of the Waste Core Strategy but it aims to remain flexible to take such advances into account.
OQ19-1671	Mr R Archard	It is less objective than it should be; inclusion of incineration is neither necessary nor desirable. At least it is not as bad as the document justifying the incinerator which is a model of its type "decide what you want to do and select the figures to justify it" so popular in the waste industry.	Noted. The Emerging Preferred Options paper is not technology specific and seeks to allocate land for all kinds of facilities.
OQ25-1675	Mr M Harvey	Many of the documents that have been put together make a great deal of sense such as the Thermal and Biological Treatment technologies initial consultation. However the more you read all the different reports the more contradictions arise. In the JMWMS the assumption that 250,000tonnes of residual waste as shown in annex D would be suitable for incineration is wrong. More than 85% of this could be recycled. The organic content would be suitable for Anaerobic Digestion and would be a forward step building upon	Support noted. The reviewed Joint Municipal Waste Management Strategy and the Waste Core Strategy are separate documents, with separate aims and objectives. The JMWMS deals with how municipal waste should be managed. The Waste Core Strategy must set the policy framework by which all waste management facility developments must be

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>Wychavon's good work. The A.D. process can help to recycle even more waste that can't currently be recycled such as certain plastics. The need for thermal treatment will then be negated as Biogas will be produced. When I was studying Environmental Pollution in the early 90's incineration was seen as something new. Now it is old and out of date! If we choose incineration we will not be just going against the Stockholm Convention but letting down the generations to come.</p>	<p>assessed, including those brought forward from the JMWMS. The Waste Core Strategy will be flexible in order to take into account changes in technology.</p>
OQ26-1676	Mr P Holden	<p>The document seems to be a useful outline and starting point. I note repeated reference to: local placing of waste treatment & management facilities; focussing on efforts to process and deal with waste close to the source of the waste; references to reducing truck-miles so as to avoid the pollution which would undermine or negate the efforts to adhere to environmentally-sound or -protective strategies/practices. I also note the adherence to nationally-agreed notions of reducing waste at source, etc. All of this is laudable and a strategic overview, along with a public consultation, is both welcome and necessary.</p> <p>The issue will be in the implementation and my concern is that already, before the ink is dry on this consultation document, the County Council is, via its main contractor, Mercia Waste, proposing an incinerator plan at Hartlebury which offends many of the criteria from your consultation.</p>	<p>Support noted.</p> <p>The JMWMS deals with how municipal waste should be managed. The Waste Core Strategy must set the policy framework by which all waste management facility developments must be assessed, including those brought forward from the JMWMS. The</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>Burning 200,000 tonnes of waste a year will be a significant proportion of the household waste currently produced (p.2) and will be a significant disincentive for re-cycling and re-use (a key principle in the proposed strategy). It will necessitate a very large facility to be built in one location (not small locally-relevant facilities as per your proposed strategies). This will have the effect of drawing waste from all over Worcestershire and Herefordshire. The number of truck-miles will be IMMENSE. This latter is explicitly against the wording and spirit of your proposed strategy - it is not dealing with waste close to its source and it is contributing significantly to environmental pollution - thus undermining any 'green' benefits of the incineration/EfW process. My concern here, however, is the underlying principle of such a proposal: If your strategy and this consultation is to have ANY credibility, the public in Worcestershire will need to feel reassured that the strategy means something and will have some impact upon how waste is managed in their county. If, while they are being consulted, the Council is planning a method of dealing with waste which completely offends and contradicts many of the key principles this strategy proposes, they are liable to feel they can have no faith in:</p> <ul style="list-style-type: none"> a) this process of consultation; b) the Core Strategy; OR c) the Council's willingness to actually adhere to the principles it says it wishes to adopt. 	<p>Waste Core Strategy will replace the existing policy framework (Structure Plan and relevant district Local Plan policies) which will be used to assess applications until the Waste Core Strategy is adopted. All applications will be advertised and consulted upon in accordance with the council's Statement of Community Involvement, which is intended to enable local people and statutory and non-statutory consultees to express their views. The council has two distinct responsibilities, as a waste disposal authority and as a waste planning authority, covered by different statutory regulations and policy requirements. The two elements are conducted quite separately. Any application for planning permission will be determined on its merits, judged on the basis of the Development Plan. A previous application by Mercia Waste for an incinerator (at Kidderminster) was refused planning permission by the council. Other proposals which do not comply with the development plan will similarly be refused.</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
Spatial Portrait			
NQ13-1624	<i>Wyre Forest District Council</i>	<p>It is apparent that the north of the County has a disproportionate amount of waste facilities, when compared to the southern areas of the County, with a specific concentration around Kidderminster and Stourport-on-Severn.</p> <p>It is therefore considered that it will be important to locate new waste facilities accordingly across Worcestershire, in order to address the current imbalance that exists between the north and the south of the County. This would be in line with the proximity principle and the rationale of reducing the travel of waste, as advocated in the Strategy. This would also support the need for future facilities to be located primarily in the County's principal settlement, Worcester.</p>	<p>The majority of waste arisings are in the northern half of the county, the current distribution of facilities reflects this. This is shown in Figures 2 and 3 in the Emerging Preferred Options document.</p> <p>Agreed in principle, but the strategy is to locate facilities as close to waste arisings as possible and there will therefore be an unequal distribution across the county.</p>
NQ13-1624	<i>Wyre Forest District Council</i>	The following sentence is confusing and requires re-wording: p.7: "Forestry remains the principal land use of the Wyre Forest"	Noted, change to be made.
NQ30-716	Amanda Smith, <i>English Heritage (West Midlands)</i>	Whilst we broadly welcome the inclusion of a section on heritage as part of the spatial portrait, other designated heritage assets should be recognised such as Registered Parks and Gardens and Registered Battlefields. As per our comments on the Issues and Options paper, the setting of designated assets is an important consideration, as too the County's wealth of non designated assets.	Noted, change to be made to recognise the value of both designated and non-designated assets.
NQ37-741(L)	Mike Price, <i>Government Office for</i>	The use of the maps is helpful in this section. It may be worthwhile trying to combine them. It	Noted, change to be made to illustrate these matters more clearly.

Reference	Name/Organisation	Summary of comments	Initial officer response
	<i>West Midlands</i>	would also be useful to see if you can develop a map showing where waste arisings are likely to increase, using the emerging Core strategies from the Districts. It would also be helpful to bring out more in the implications of for waste and the strategy for dealing with it e.g. the potential influence of the landscape. There are two questions which could be asked, how do the factors listed in the spatial portrait influence the strategy for waste and what impact could the strategy have on the spatial portrait?	
NQ37-741(L)	Mike Price, <i>Government Office for West Midlands</i>	Contextual Issues: We note your understanding of these issues and the “living document approach” to evidence. You should be aware that the evidence base will need to be in place at the time of Publication.	Noted. Background documents will be updated until formal submission and made available on the council's website www.worcestershire.gov.uk/wcs .
Vision and Objectives			
NQ9-817	Frank Hill, <i>Campaign to Protect Rural England</i>	<p>We have no comments on the Vision but wish to make a few comments on the Objectives:</p> <p>WO1: The reference to climate change is disingenuous, since we have no certainty about what climate change is, nor how much waste mis-management has contributed to it, nor any means of measuring what influence waste management will have on it.</p> <p>WO2: Much domestic waste comprises excessive packaging and junk mail, most of which originates outside Worcestershire and for which householders are not responsible. It is unclear</p>	<p>It is government policy that Core Strategies should address climate change issues. We agree that some matters are uncertain, but we need to prepare for and mitigate against possible impacts.</p> <p>The Council, together with Herefordshire Council and Worcestershire District Councils, is currently undertaking a campaign to minimise waste arisings and has targeted the</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>what the Council can do to minimise this.</p> <p>WO3 to WO10: agreed.</p>	<p>need to reduce junk mail in particular as part of its '<i>Jilt the Junk Mail</i>' campaign.</p> <p>Support noted.</p>
NQ13-1624	Wyre Forest District Council	<p>Regarding: p.12: "<i>We should look at making a high provision for waste management; if we do anything less, we will make it difficult for the industry to get the planning permission it needs and we will not achieve our Vision</i>"</p> <p>Principle 7. "<i>For businesses waste will mean opportunity and for Council's it will mean encouraging new waste management facilities</i>"</p> <p>Whilst it is accepted that provision for waste is an important issue, this needs to be carefully balanced with other material considerations. The onus should be on ensuring that the right type of development at the right scale and location is promoted rather than providing a blanket approach of "<i>making a high provision for waste and encouraging new waste management facilities</i>", which could cause difficulties if proposals are considered unacceptable.</p>	<p>The strategy will be based on the concept of a capacity gap and there is no intention to limit the number of facilities provided subject to the concept of equivalent self-sufficiency in waste management capacity for Worcestershire. We are developing policies to ensure that applications can be assessed against matters of acknowledged importance.</p>
NQ13-1624	Wyre Forest District Council	<p>The main guiding principle that was included in the Refreshed Issues and Options Document was:</p> <p><i>"To conserve and enhance the natural, built and historic environment and the amenities, health and safety of everyone who lives and/or works in Worcestershire... This will be the ultimate test of whether development proposals will be acceptable or not."</i></p>	<p>We agree with this principle but following the Refreshed Issues and Options consultation, the approach was revised to balance impacts and benefits which may go beyond the local area. The policies will consider these issues whilst weighing their significance against other considerations of sustainability.</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
		It is considered that this objective should be included as part of the Waste Core Strategy.	
NQ13-1624	<i>Wyre Forest District Council</i>	Reference to the proximity principle and adopting a precautionary approach were also included in the Refreshed Issues and Options document and it is considered that these could be usefully included here.	Noted, but neither term is now included in current Government policy. We intend to base the strategy around these concepts, but may not refer to them directly.
NQ16-719	<i>Environment Agency</i>	<p>The strategy needs to emphasise the opportunities to maximize the value of waste, in particular, but not limited to the need to ensure maximum energy recovery. This is particularly important for landfill, energy from waste sites, anaerobic digesters and gasification plants. More effort needs to go to create challenging targets to ensure maximising the value of waste. Particularly in the landfill field, we are pushing to maximise the collection of landfill gas at operational sites to ensure that we can produce energy, but also to prevent the loss of greenhouse gases without treatment. Challenging targets would link in to the council's position on reducing the impact of climate change.</p> <p>The issue of <i>flexibility</i> of scope and location of waste infrastructure can be seen as both positive and negative. Generally some flexibility is to be encouraged, particularly the drive to recycle, where appropriate, previously used land in preference to brownfield sites, however some strengthening of direction could be helpful.</p>	<p>It is government policy that the Waste Core Strategy should implement the waste hierarchy, which seeks to do just this, and to encourage the minimisation, reuse and recycling of waste. Changes will be made to make this more explicit.</p> <p>Changes proposed to the wording of the policies relating to landfill.</p> <p>Noted, change to be made to link policies more explicitly to RSS policies on where waste management facilities should be permitted.</p>
NQ16-719	<i>Environment Agency</i>	It is encouraging to note that the council is	Noted. This is something the council intends

Reference	Name/Organisation	Summary of comments	Initial officer response
		committed to the provision of waste infrastructure that is flexible and aims to drive waste up the hierarchy. However, the policies do not sufficiently emphasise the need to encourage the minimisation of waste arisings within the county. The minimisation of waste should be the main priority of sustainable waste management policies as the minimisation for waste is at the top of the waste hierarchy.	to address through other means.
NQ16-719	<i>Environment Agency</i>	We support the principle of policies that seek to ensure that the waste implications of new developments are accounted for and that opportunities to reduce waste generation, and to use recycled aggregates in place of primary aggregate are maximised.	Support noted.
PR52-1679	Martin Pollard/Nick Roberts, <i>Axis on Behalf of Mercia Waste Management (MWM)</i>	Page 13 and Page 37 – we note that objective W06 as it appears on the above pages is different and it appears the latter reference should be for objective W05.	Noted, change to be made.
PR52-1679	Martin Pollard/Nick Roberts, <i>Axis on Behalf of Mercia Waste Management (MWM)</i>	Page 9 – Contextual issues – MWM welcome the Councils support of increased recycling, composting and energy recovery as means of reducing greenhouse gas emissions from the waste generated in the county	Support noted.
PR52-1679	Martin Pollard/Nick Roberts, <i>Axis on Behalf of Mercia Waste Management (MWM)</i>	Page 11 – 12 – Vision Statement – MWM support the vision and philosophy upon which the strategy has been founded and in particular the acknowledgement that residual waste (that remaining after recycling and composting) should be used as a resource. And specifically that	Support noted.

Reference	Name/Organisation	Summary of comments	Initial officer response
		maximum benefit should be obtained from the residual waste though energy recovery or as a fuel before landfill becomes a consideration. Such an approach is entirely consistent with the requirements of Waste Strategy England 2007.	
NQ23-818	Miss V Kendrick, <i>CPRE Redditch Group</i>	Objective WO6 is to "make communities in Worcestershire take responsibility for their own waste". Yes. Agree.	Support noted.
NQ27-1127	Mark Pearce, <i>Advantage West Midlands</i>	The Agency supports the vision and objectives of the document, which will be delivered via a range of proposed policies.	Support noted.
NQ29-1162	Cat Ainsworth, <i>Worcestershire Partnership Climate Change Theme Group.</i>	The Group is broadly in agreement with the strategy's vision statement and core philosophy.	Support noted.
NQ30-716	Amanda Smith, <i>English Heritage (West Midlands)</i>	We welcome the broad reference in support of the Vision statement regarding avoiding damage to natural and cultural assets.	Support noted.
NQ30-716	Amanda Smith, <i>English Heritage (West Midlands)</i>	Whilst we acknowledge the position on avoiding the repetition or reformulation of national or regional policy, in the context of expressing the more detailed objectives in support of the Vision we consider that a specific objective on conserving and enhancing Worcestershire's natural, built and historic environment is valid and warranted. This flows from the Vision (5), is consistent with nation and regional policy, and provides the link to the proposed set of strategic policies, especially in determining the sustainability of proposals.	Noted, change to be made.

Reference	Name/Organisation	Summary of comments	Initial officer response
NQ37-741(L)	Mike Price, <i>Government Office for the West Midlands</i>	The vision is acceptable at a high level but it should not be simply an abstract concept. It needs to be a spatial vision setting out what Worcestershire will be like in terms of its treatment of waste. Some of the objectives could be woven into the spatial vision.	Noted, change to be made.
General Principles			
NQ13-1624	<i>Wyre Forest District Council</i>	General support for the principles outlined (p29) Insert 'and local' after 'national' in fourth bullet point.	Support noted. Noted, change to be made.
Sustainability Appraisal			
NQ16-719	Hilary Berry, <i>Environment Agency</i>	This document appears to provide a thorough appraisal in a comprehensive approach to potential issues. We note the reference to a forthcoming SFRA and the references to not increasing flood risk. Reference, both in the SA and in the strategy document, should however also be included for the need for site specific FRA's as required by PPS 25 Development and Flood Risk. We would support the aims of the monitoring recommendations as put forward in the SA.	Support noted. Noted, change to be made. Support noted.
Further sources of information/guidance documents			
NQ6-1649	Mr P Vernon	Please may I also refer you to Selby facility http://selbyrep.co.uk	Noted. <i>Worcestershire Waste Core Strategy Background Document: Recovering Energy from Waste</i> considers issues relating to both thermal treatment and anaerobic digestion. The Waste Core Strategy will specifically

Reference	Name/Organisation	Summary of comments	Initial officer response
			encourage both Anaerobic Digestion and developments involving Combined Heat and Power of the kind developed at Selby.
NQ6-1649	Mr P Vernon	The Stockholm convention is not mentioned in any scoping document or JMWM strategy, but the release of dioxins must be eliminated under this convention and incineration will increase the background levels. Who's responsibility is this the Environmental permitting authority or the planning authority?	All applications with potentially significant environmental impacts will be required to include an Environmental Impact Assessment. The Environment Agency is responsible for advising the council on the pollution implications of waste management proposals and will be consulted on both the emerging strategy and any specific proposals; it also has a statutory duty to monitor such sites. It is government policy that planning authorities must assume that this is carried out properly.
NQ16-719	<i>Environment Agency</i>	We can not find an explicit reference to our guidance document Groundwater Protection: Policy and Practice GP3 (available on our web site) which should be used in conjunction with the location policy and the reference to the most highly polluting sites such as landfills. The GP3 reference (and appropriate information/direction from this) should be included in the Strategy.	Noted, change to be made.
NQ16-719	Hilary Berry, <i>Environment Agency</i>	The Waste Data Interrogator and Hazardous Waste Interrogator 2008 have now been produced and are available for use by waste planning authorities. Although we understand that there has to be a cut off point for source data, we strongly recommend incorporating this more recent data into the report as this could potentially have a bearing on the C and I and hazardous	Agreed. Figures will be updated to take account of this information.

Reference	Name/Organisation	Summary of comments	Initial officer response
NQ16-719	Hilary Berry, <i>Environment Agency</i>	waste projections that have been calculated. Please see our previous correspondence to you on the SFRA. The SFRA should include aims and policies relating to waste sites in relation to flood risk. This should form part of the work we require in bringing together data from other SFRA's. Based on the outcomes of the Worcestershire's SFRA's there should be local distinctive policies on flood risk for the WCS.	Noted, change to be made.
PR24-1645	Mrs L Brookes	See Mercia Waste Management Scoping Document-4.2.6&4.2.7 paragraphs stating lack of municipal waste. 4.10.2 point 4 re air quality and emissions.	Noted. It is commonplace for thermal and other large waste treatment facilities to be built to provide for a peak capacity which will not be reached for some time and to supplement inputs until they are at optimum capacity. Government policy supports the principle of developing facilities which manage waste from both public and private sectors. The Waste Core Strategy will set out the policy framework to clarify how all applications for waste management facilities will be assessed. These will include all relevant issues, including both the veracity and implications of the kinds of emissions referred to in para 4.10.2 of the Mercia Waste Management Scoping Document. There is a statutory duty on the Council to consult the Environment Agency, Environmental Health Authority and Health Authorities about these (and other) matters and planning permission will not be granted

Reference	Name/Organisation	Summary of comments	Initial officer response
			for proposals which do not accord with the Development Plan.
NQ24-1276	Vaughan Welch, <i>The Inland Waterways Association, West Midlands Region.</i>	<p>The Regional Transport Plan clearly demonstrates the need to consider environmental forms of transport and, in the case of the use of water transport, this is strengthened by Waterways for Tomorrow (a mandatory planning document that was issued by the ODPM in 2000 and is still valid). Also the Water Framework Directive (EEC), that in the case of Worcestershire is presently being written into the Severn River Basin Management Plan, seems to have been overlooked yet it clearly has an effect on the Strategy and will need to be included for within it, especially the Draft Policy Directions that drive the actual strategy.</p> <p>Therefore, whilst supporting the draft options in principle, IWA objects to the lack of foresight within them to consider, in transportation terms, the environmental needs of the second half of the 21st Century at the very time when the enable infrastructure needs to be built. We would be pleased to answer any queries that you have on these points and, in the meantime, request that they are included in the submission document.</p>	<p><i>Waterways for Tomorrow</i> and its implications for the Waste Core Strategy are considered in the background document <i>Inland Waterways</i> available on our website www.worcestershire.gov.uk/wcs. This background document will be updated to take account of the <i>Water Framework Directive</i> and the <i>Severn River Basin Management Plan</i>.</p>
Consultation Process			
NQ7-567	Louise Gerber, <i>Eckington Parish Council</i>	The questionnaire was considered at the Parish Council meeting in January, however the Meeting was in total agreement that the questions were of an unnecessary technical nature and that the Parish Council did not have enough knowledge on	The issues involved are complex. An information sheet and a short summary document were sent to all Parish Councils along with the questionnaire, to help those without technical knowledge comment on the

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		the subject to answer in an informed way, therefore the PC will not be returning the questionnaire.	policy proposals.
PR16-1216	Mr Philpott, <i>Salford Priors Parish Council</i>	Complexity of the Strategy Process - the Parish Council is extremely concerned about the complexity of the whole process. We count 30 major reference documents named in the report and it is impossible for anyone other than those intimately concerned with the production of the Strategy to check out all the details of the proposals made. We would urge that attempts be made through your professional associations to try to simplify this whole process.	The issues are necessarily complex, but to try to keep the document a simple and possible and to reduce the size of the main report some of the information was not included. Instead it was available alongside it in the background documents available on our website www.worcestershire.gov.uk/wcs . The Consultation document was however informed by these background documents.
NQ11-796	Mr R Harris, <i>Friends of the Earth Kidderminster</i>	<p>Unless I am mistaken your Waste Core Strategy is based on the minimisation of much of the Council's Waste.</p> <p>Presumably this will be dependent upon the Hartlebury proposal receiving planning permission. If however the application is refused as was the case at Kidderminster how will you proceed as far as the Waste Core Strategy is concerned.</p>	<p>Agreed. Waste minimisation is one of our primary objectives.</p> <p>The Emerging Preferred Options document is not technology specific and does not propose an incinerator at Hartlebury. It seeks to allocate land for all kinds of facilities.</p>
NQ12-1503	Mr B Jordan	In light of the Planning Application for an incinerator at Hartlebury I am concerned as to where this leaves us with regard to the Waste Core Strategy. It would seem logical that a Waste Core Strategy should be decided before any planning applications are put forward otherwise the strategy will have to be tailored to fit any applications granted.	The Waste Core Strategy must set the policy framework by which all waste management facility developments must be assessed, including those brought forward from the reviewed Joint Municipal Waste Management Strategy. The Waste Core Strategy will replace the existing policy framework (Structure Plan and relevant district Local

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>Therefore I feel that it is a waste of my time being involved as some major decisions seem to already have been made using as an excuse a contract entered into between Worcestershire County Council and Mercia Waste in 1998 nearly 12 years ago. Surely things have changed or moved on since then.</p>	<p>Plan policies) which will be used to assess applications until the Waste Core Strategy is adopted. The council has two distinct responsibilities, as a waste disposal authority and as a waste planning authority, covered by different statutory regulations and policy requirements. The two elements are conducted quite separately. Any application for planning permission will be determined on its merits, judged on the basis of the Development Plan. A previous application by Mercia Waste for an incinerator (at Kidderminster) was refused planning permission by the council. Other proposals which do not comply with the development plan will similarly be refused.</p>
PR24-1645	Mrs L Brookes	<p>Questionnaire very complex-misleading. People may not say what they really mean. Could be misinterpreted and give a false view.</p> <p>Has been sent out in a very adhoc manner.</p>	<p>The issues involved are necessarily complex, but an information sheet and a short summary document were made available with the questionnaire, to help those without technical knowledge comment on the policy proposals.</p> <p>The questionnaire was sent out in accordance the WCCs <i>Statement of Community Involvement</i>. As such it was sent directly to all Parish Councils in or adjoining Worcestershire and all organisations or individuals expressed an interest or had previously been involved in consultations on the Waste Core Strategy. It was also made available in all libraries. In order to publicise</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
			the consultation a notice was place in all County Newspapers and the Council's <i>Word on Worcestershire</i> magazine which is sent to all households in the County.
PR24-1645	Mrs L Brookes	Closing date 04/02/10. Wychavon Executive Committee already voted to accept incineration! How can this be?	The Waste Core Strategy is being developed by Worcestershire County Council. Wychavon District Council is a distinct and separate body making decisions which are independent from the County Council.
PR34-1625	Katie Limm, <i>Belbroughton Parish Council</i>	The Parish Council considers that continuing full and open consultation on the strategy, and in particular, on the identification of acceptable broad locations for new waste facilities, is crucial. The current consultation documents are not an easy read . Whilst this may be largely due to the complex subject matter, the drafting-even of the summary document-is at times rather cumbersome and hard to follow (see the boxed material on p19 about landfill policy). If the final document is to be used by all interested parties (not just planners and lawyers) it needs to be accessible as possible.	Noted. The issues are complex and this is reflected in the document. The submission document will however be drafted to be as accessible as possible, without simplifying what are often complicated issues.
NQ19-1644	Mr and Mrs Hemmings	My attention has been drawn to the Waste Core Strategy document, which is extremely difficult to understand. My Wife and I are in our eighties, completing this form was impossible.	The issues involved are necessarily complex, but an information sheet and a short summary document were made available with the questionnaire, to help those without technical knowledge comment on the policy proposals. Although consultation comments were request through the questionnaire, they were also accepted by letter or email.

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NQ20-1642	CM Sanderson	<p>It is only because of Mercia's proposed planning application to build an incinerator in Hartlebury that my attention has been drawn to Worcs. Waste Core Strategy. I understand every newspaper in the County had an advertisement placed by WCC inviting the public to air their views. This is no way to obtain the general public's opinion on such an important matter. Every household should receive a questionnaire printed in such manner it is easily understood and not asked to complete the questionnaire Emerging Preferred Options Report which is totally beyond comprehension of 80% of the general public, or it this what our local County Council want - people in Worcestershire don't care how we get rid of the rubbish in Herefordshire&Worcs?</p> <p>If the general public do not complete the form are we to assume their views will not be taken into consideration? Government states we should be self-sufficient in food production by 2020-what about the agricultural and livestock farming-how will waste disposal affect this-too many questions to be rushed through a computer with too few public members taking part. I hope we can trust the County Council to make the correct decisions, after all your salaries are paid by us.</p>	<p>The consultation was undertaken in accordance the WCCs <i>Statement of Community Involvement</i> which has been adopted by the Councillors.</p> <p>In order to publicise the consultation a notice was place in all County Newspapers and the Council's <i>Word on Worcestershire</i> magazine which is sent to all households in the County. Documents were sent directly to all Parish and all organisations or individuals that has expressed an interest or had previously been involved in consultations on the Waste Core Strategy. The Documents were also made available in all libraries and on our website. The cost associated with sending questionnaires to all households is prohibitive.</p> <p>Although consultation comments were requested through the questionnaire, they were also accepted by letter or email and all comments received will be taken into account. The final decision on the content and adoption of the Waste Core Strategy will be made by the Councillors who are elected to represent the public, not council officers.</p>
NQ22-642	Mr Lawrence McCurrich, <i>Rushock Parish Council</i>	The Parish Council has considered your questionnaire and feel that the responses are best answered by technical experts who would also	Noted.

Reference	Name/Organisation	Summary of comments	Initial officer response
		have access to all the issues involving quantities etc.	
NQ37-741(L)	Mike Price, <i>Government Office for the West Midlands</i>	We note that this consultation is work in progress towards the Publication of the Waste Core Strategy in January 2011. We remain concerned about the length of time being taken to prepare the Core Strategy and consequently urge you to move as quickly as possible to the Publication stage.	Noted. The timetable is set out in the adopted Local Development Scheme which was agreed in consultation with GOWM and is monitored through the AMR. We will discuss revisions to the LDS if we consider that the timetable can be reduced.
NQ37-741(L)	Mike Price, <i>Government Office for the West Midlands</i>	We note that you are intending to prepare two reports in relation to this most recent consultation and will then develop preferred options for more focussed consultations. This would then inform the preparation of the Publication draft during the second half of 2010. You might consider in the light of the representations received if this process can be condensed.	Noted, to be considered.
NQ37-741(L)	Mike Price, <i>Government Office for the West Midlands</i>	On your current timetable the period between Publication and Submission is reasonable given that there should be few changes to the Core Strategy after Publication. The Publication version should be the strategy which the authority wishes to deliver. There is concern over the reference to general consultation during 2011. Publication of the Waste Core Strategy is not really a consultation stage; it is the opportunity for responses to be made to that should be the final document (in the Council's opinion). Wherever possible issues should have been resolved before Publication and the aim should be to have few, if any, changes between	Noted.

Reference	Name/Organisation	Summary of comments	Initial officer response
		publication and Submission.	
OQ6-1666 OQ7-1444	Mrs E Morgan & Mr P Morgan	The impression given is that this is not really a consultation document but the council telling the proles what it is going to do - the reason for this is the format of the document and this questionnaire gives very little option to comment except in a very guided and controlled manner with minimal questions.	The issues involved are necessarily complex, but an information sheet and a short summary document were made available with the questionnaire, to help those without technical knowledge comment on the policy proposals. Although consultation comments were request through the questionnaire, they were also accepted by letter or email.
OQ15-1668	N and K Dowty	This document has been exceptionally difficult to complete and complex to understand. It is doubtful whether the responses that you receive will be meaningful as "Jo public" almost needs a degree in waste management to understand this sufficiently well to answer the questions. Also it has not been well publicised (Unlike the transport strategy) & all media attention has been very recent, not allowing sufficient time to read the full 88 pages, digest and respond.	See above. The consultation was undertaken in accordance the WCCs <i>Statement of Community Involvement</i> which has been adopted by the Councillors. In order to publicise the consultation a notice was place in all County Newspapers and the Council's <i>Word on Worcestershire</i> magazine which is sent to all households in the County. Documents were sent directly to all Parish and all organisations or individuals that has expressed an interest or had previously been involved in consultations on the Waste Core Strategy. The Documents were also made available in all libraries and on our website. The consultation was for a three month period to enable comments to be made.
OQ13-1667	Mrs Scarrat	Any other Comments? What a joke! Blinding people with too much confusion.	See above.
OQ21-670	Councillor Dawn Merriman, <i>Warndon Parish Council</i>	It is a difficult topic to comment on as unless you are an expert in this field we are somewhat reliant on the information you have provided being correct.	See above.

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OQ23-1673	Mr T Jauncey	This document has been poorly put together. It will not give a clear indication because the type of person who can take the time out to read, digest and reply to this are too small a cross section of the community. Old age pensioners for example have no chance whatsoever of wading through the papers you put out. There should have been a clear concise summary of the issues and not try to have to go to so much effort to be able to fill in the form. Very disappointed or was this designed to get a small response and not a cross section!!!!!!	The issues involved are necessarily complex, but an information sheet and a short summary document were made available alongside the main document, to help those without technical knowledge comment on the policy proposals.
OQ30-1684	Seskco3 (email address)	The issues involve the stakeholders at all levels regardless of race, colour age or disabilities and is in some respect mildly offensive.	Noted.
NQ38-661(L)	Mrs D Taylor, <i>Suckley Parish Council</i>	The documents are immensely detailed and seem to generally reflect a sensible and admirable attempt to deal positively with difficult issues and demands	Support noted.
Specific site/areas			
NQ8-588	Mrs J Herons, <i>Hartlebury Parish Council</i>	On a local level Hartlebury has endured more than its fair share of waste disposal over the last few decades with 3 landfill sites in a very small rural parish. We would once again like it to be placed on record that Hartlebury residents have "done their bit" and the County need to look elsewhere to manage their waste.	Noted. A combination of factors must be taken into account when identifying preferred areas for waste management facilities. We will be developing a methodology for this through the course of 2010 and will be undertaking further consultation on this.
NQ6-1649	Mr P Vernon	Hartlebury already has a long history as a waste disposal site for Worcestershire with 2 dumps running at present and has done "its bit" and lived with the associated problems of smell, noise, traffic for many years. It is unfair to subject the	Noted. All applications with potentially significant environmental impacts will be required to include an Environmental Impact Assessment. The Environment Agency is responsible for advising the council on the

Reference	Name/Organisation	Summary of comments	Initial officer response
		village to toxic emissions and plumes of smoke and ash and a huge eyesore to boot!	pollution implications of waste management proposals and will be consulted on both the emerging strategy and any specific proposals, it also has a statutory duty to monitor such sites. It is government policy that planning authorities must assume that this is carried out properly.
PR23-1643	Mr P Miles	<p>The proposed incinerator in Hartlebury should not be given the go ahead for the following reasons:</p> <ul style="list-style-type: none"> • Increased carbon footprint as a result of lorries travelling from two counties to one site. • Against all existing planning permissions. • Accepting the proposal would have a massive negative impact on the social and economic welfare of the local communities. • Mercia Waste Management aren't giving anything back to the local community. • Worcestershire's Waste management policy will be giving a long-term financial and social commitment to an outdated form of waste management. 	<p>See above. The Waste Core Strategy does not specifically propose incineration. The Waste Core Strategy must set the policy framework by which all waste management facility developments must be assessed, including those brought forward from the reviewed Joint Municipal Waste Management Strategy. The Waste Core Strategy will replace the existing policy framework (Structure Plan and relevant district Local Plan policies) which will be used to assess applications until the Waste Core Strategy is adopted. The council has two distinct responsibilities, as a waste disposal authority and as a waste planning authority, covered by different statutory regulations and policy requirements. The two elements are conducted quite separately. Any application for planning permission will be determined on its merits, judged on the basis of the Development Plan. A previous application by Mercia Waste for an incinerator (at Kidderminster) was refused planning permission by the council. Other proposals which do not comply with the development</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
			plan will similarly be refused.
PR30-1649	Mr and Mrs C Jones	After 3 generations of tipping in Hartlebury we DO NOT want an incinerator in this village for our future generations health and welfare's sake.	Noted, see above.
PR31-Anon	Anonymous	As a member of the Hartlebury Community I am strongly against Mercia Waste management proposals for building an incinerator on the trading estate at Hartlebury.	See above.
NQ35-1664	Mr & Mrs C Greatbatch	We are aware of the proposal for a Waste Incinerator at Hartlebury Trading Estate. We are new to Hartlebury and thereby Worcestershire and don't feel qualified to answer the questionnaire. From what we understand Hartlebury is already involved with waste disposal by previous and current landfill sites. We also understand that there are other methods of waste disposal eg increased recycling, anaerobic digestion etc which are more environmentally efficient. We also believe that waste should not be transported across the county in order to minimise carbon pollution. We would also support any strategy which aims to reduce the amount of waste produced.	Noted. Objective 6 aims to reduce the transportation of waste by road, and Objective 2 aims to minimise waste production.
NQ36-1665	Mr B & Mrs J Maybury	We would like to express our profound disagreement with the proposal to set up an incinerator at Hartlebury and the employment of the large number of lorries to and fro to the site that this would entail. Already the residents are disturbed by heavy goods vehicles coming through the village, cars careering down the old Worcester road (30mph) frequently exceeding the	The Waste Core Strategy does not specifically propose incineration. A combination of factors must be taken into account when identifying preferred areas for waste management facilities, including impacts on the transport network. We will be developing a methodology for this through the course of 2010 and will be undertaking further

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>speed limit, and if this disturbance is to be immeasurably increased by the extraordinary number of lorries that have been proposed, coming up to the island and going down Crown Lane. The place will be transformed into something worse than the M1.</p> <p>We do not see why this incinerator, if it is really necessary, cannot be put somewhere a long way from an area such as Hartlebury. Furthermore, it seems to us that if this is supposed to meet the recycling needs of Herefordshire and Worcestershire, why it should not be sited nearer the border of the two counties.</p>	<p>consultation on this. The Waste Core Strategy must recognise the need for cross-boundary co-operation, however it is inevitable that economies of scale mean that some wastes will be imported and exported into and out of the county. The strategy will seek to minimise this and will be based upon achieving equivalent self-sufficiency in waste management capacity.</p>
Joint Municipal Waste Management Strategy (JMWMS)/Municipal Waste Management Contract			
PR10-1649	Mr P Vernon	<p>The JMWMS makes two very dangerous and erroneous assumptions. The first that there will be 250,000 tonnes of residual waste. The second that some form of thermal treatment will be necessary. The 250,000 tonnes of residual waste contains 85% of recyclable materials as shown in Annex D. 116,000 tonnes will be organic material suitable for AD and energy recovery via biogas. A good model is the segregation started by Wychavon for organic waste. This should be used by the partnership but weekly collections going to AD. There will also be other materials for recycling within this waste like plastics and glass, even non combustibles! The assumption that thermal treatment will then be necessary is also negated!</p>	<p>The Emerging Preferred Options are informed by the projections in the JMWMS, the Regional Spatial Strategy and data from other sources (as outlined in the <i>Waste Core Strategy Background Document: Waste Arisings</i>). However the assumptions in the JMWMS are not the subject of this consultation.</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>There is no place for waste incineration as mass burn in waste management. It deters recycling and is obscene as well as generating persistent organic pollutants contrary to the Stockholm convention.</p> <p>Please also note that the residual waste composition as stated in JMWMS shows 47% organic content. May I point out that this is better dealt with by segregation as Wychavon (the only district to do so) currently do with special blue bins and then treating for compost or indeed EfW via Anaerobic digestion. AD plants are also much lower risk and lower in cost than incinerators and have environmental benefits as well as government tariff support.</p> <p>Mass balance calculations seem to be erroneous in the sensitivity analyses in the JMWMS Residual waste annex as they conclude that there is an environmental benefit to Incineration with EfW and CHP.</p>	<p>The Stockholm Convention will be taken into account in the preparation of the Waste Core Strategy.</p> <p>The consideration of potential for composting and AD is based on the background document <i>Recovering Value from Biodegradable Waste</i>. Page 35 of the background document considers food waste from MSW and explains that whilst collection is offered in on district it is unlikely that it will be offered elsewhere. However this is the concern for the reviewed Joint Municipal Waste Management Strategy and Waste Collection Authorities rather than the Waste Core Strategy.</p> <p>The assumptions in the JMWMS are not the subject of this consultation.</p>
NQ12-1503	Mr B Jordan	In light of the Planning Application for an incinerator at Hartlebury I am concerned as to where this leaves us with regard to the Waste Core Strategy. It would seem logical that a Waste Core Strategy should be decided before any planning applications are put forward otherwise the strategy will have to be tailored to fit any applications granted. Therefore I feel that it is a	The Waste Core Strategy must set the policy framework by which all waste management facility developments must be assessed, including those brought forward from the reviewed Joint Municipal Waste Management Strategy. The Waste Core Strategy will replace the existing policy framework (Structure Plan and relevant district Local

Reference	Name/Organisation	Summary of comments	Initial officer response
		waste of my time being involved as some major decisions seem to already have been made using as an excuse a contract entered into between Worcestershire County Council and Mercia Waste in 1998 nearly 12 years ago. Surely things have changed or moved on since then.	Plan policies) which will be used to assess applications until the Waste Core Strategy is adopted. The council has two distinct responsibilities, as a waste disposal authority and as a waste planning authority, covered by different statutory regulations and policy requirements. The two elements are conducted quite separately. Any application for planning permission will be determined on its merits, judged on the basis of the Development Plan. A previous application by Mercia Waste for an incinerator (at Kidderminster) was refused planning permission by the council. Other proposals which do not comply with the development plan will similarly be refused.
PR24-1645	Mrs L Brookes	<p>Very dangerous assumptions made by JMWMS. There would not be 250,000 tonnes of residual waste if properly sorted! Incineration deters recycling and leads to the burning of recyclable waste and toxic chemicals and industrial waste. Mercia's parent company manufacture incinerators and you already have a waste contract with them. Extra hazardous waste would be also brought in from the black country too I fear.</p> <p>Please look at other options of energy from waste and make a more informed choice.</p>	<p>The assumptions in the JMWMS are not the subject of this consultation. The council has two distinct responsibilities, as a waste disposal authority and as a waste planning authority, covered by different statutory regulations and policy requirements. The two elements are conducted quite separately.</p> <p>The Waste Core Strategy is not technology specific.</p>
OQ11-1689	Dr A Judge	The JWMS assumes that there will be 250,000 tons of residual waste p.a. and that the optimum	The assumptions in the JMWMS are not the subject of this consultation.

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		<p>way to deal with this is through thermal treatment. These assumptions are not valid. The 250,000 tons of residual waste contains 85% of recyclable materials (Annex D). Almost half of this will be organic material suitable for anaerobic digestion and energy recovery via biogas. Wychavon DC has already started separate collections for organic waste. This approach should be used across the county, with weekly collections or organics being processed by anaerobic digestion. Much of the remainder of the waste is recyclable, if the appropriate sorting facilities are established. Incineration has no place in Worcestershire's management of waste over the coming decades. It will act as a deterrent to effective recycling and will mean that persistent organic pollutants are pumped into the air over the county for a generation at least. The use of incineration is contrary to the Stockholm Convention. Please do not inflict incinerators on the people of Worcestershire: more environmentally friendly and sustainable technologies and processes are already available.</p>	<p>The consideration of potential for composting and AD is based on the background document <i>Recovering Value from Biodegradable Waste</i>. Page 35 of the background document considers food waste from MSW and explains that whilst collection is offered in on district it is unlikely that it will be offered elsewhere. However this is the concern for the reviewed Joint Municipal Waste Management Strategy and Waste Collection Authorities rather than the Waste Core Strategy.</p> <p>The Waste Core Strategy is not technology specific and does not specifically propose incineration.</p>
Education			
PR7-1599	Mr Carl Theakston, Essential Supply Products Ltd	<p>Is there an educational strategy being planned for people across all age groups which will align them with an understanding of why this issue is of such importance. So that (a) individuals understand the scale of the challenge, (b) better ideas can be developed by subsequent generations to respond to these needs.</p>	<p>We agree that education has an important role to play in achieving the minimisation of waste. This is beyond the remit of the Waste Core Strategy, but is being undertaken as part of the reviewed Joint Municipal Waste Management Strategy.</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
PR16-1216	Mr Philpott, <i>Salford Priors Parish Council</i>	Waste reduction - whilst waste minimisation is mentioned in the report there do not appear to be any strategies to prevent waste being created. It actually appears as if MSW and C&I are predicted to increase. There should be a waste prevention strategy with a public education programme and perhaps promotion of CIWM Waste Awareness Certificate programme towards commerce and industry.	We agree that education has an important role to play in achieving the minimisation of waste. This is beyond the remit of the Waste Core Strategy, but is being undertaken for MSW as part of the reviewed Joint Municipal Waste Management Strategy. Objective 2 aims to minimise waste production and the Council is pursuing this through its economic development function. Our predictions for MSW and C&I are based on national and regional forecasts which do assume continued waste growth.
PR16-1216	Mr Philpott, <i>Salford Priors Parish Council</i>	Any new waste facilities or installations that are proposed to be developed within the county should have obtained an appropriate environmental permit before operations commence. It would be helpful if the document made reference to the benefit of consulting the Environment Agency at an early stage with respect to discussions regarding permit requirements for proposed new facilities in order to avoid undue delay and to ensure that any relevant permits are in place in a timely manner. The benefit of twin tracking planning application and permit so having all the necessary information up front and available to both sets of decision makers should be emphasised.	Agreed, change to be made.
PR29-1650	Mr S Tranter	You need to be better educated to recycle again and again. That also means proper identification symbols used on leaflets. This is not done at the moment.	We agree that education has an important role to play in achieving the minimisation of waste. This is beyond the remit of the Waste Core Strategy, but is being undertaken as

Reference	Name/Organisation	Summary of comments	Initial officer response
			part of the reviewed Joint Municipal Waste Management Strategy.
PR32-1648	Mrs G Sanderson	Basically we are all lazy! Easy way out - put it in the bin - C.C will get rid of it. But - we need as a Nation to consider how we get rid of waste. Different Councils have different ways/methods of waste disposal. Life would be easier if as a Country we all did the same! The infants are already very geared up to "saving the planet" they do not automatically put it in the "landfill bin" - recycling at school. TV and school have done an excellent job - incineration will make us even lazier.	We agree that education has an important role to play in achieving the minimisation of waste. This is beyond the remit of the Waste Core Strategy, but is being undertaken as part of the reviewed Joint Municipal Waste Management Strategy.
PR39-1657	Tom Beard, <i>Ecobonomic Solutions Ltd, Heartfood, Worcester Greenpeace, Transition Foods</i>	I'm not convinced anyone involved in implementing this fully understands waste streams, waste management and the integration of technologies according to minimisation and lowest cost over time. Not enough businesses across Worcestershire realise why they must manage waste effectively. These businesses need to be targeted. Food arisings from these businesses and households give enough scope for a full scale AD plant or smaller ones in closer proximity if preferred. The key to a waste strategy is ambition and education - not burning it!	Noted. Objective 2 aims to minimise waste production and the Council is pursuing this through its economic development function. The Emerging Preferred Options paper is not technology specific and seeks to allocate land for all kinds of facilities, which could include both thermal treatment and AD facilities. <i>Worcestershire Waste Core Strategy Background Document: Recovering Energy from Waste</i> considers issues relating to both thermal treatment and anaerobic digestion.
NQ29-1162	Cat Ainsworth,	The Group recognises that the primary focus of	Objective 2 aims to minimise waste

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	<i>Worcestershire Partnership Climate Change Theme Group</i>	the waste core strategy should be on encouraging and supporting waste minimisation. It is recognised that this matter is highlighted in the document, and is central to the philosophy that guides the strategy. Nevertheless, the core strategy focuses on the management of waste. Further attention should have been given towards the development of strategies that are designed to encourage waste minimisation. These should include a communication and educational strategy as well as working with other local authorities to encourage Whitehall to develop policies that will minimise the production of waste.	production and the Council is pursuing this through its economic development function. We agree that education has an important role to play in achieving the minimisation of waste. This is beyond the remit of the Waste Core Strategy, but is being undertaken as part of the reviewed Joint Municipal Waste Management Strategy.
Other Issues			
PR14-1532	Costcutter Supermarkets, <i>Solitaire Avenue</i>	I'm not sure how to answer all the questions however all I would like to say is that we would like our waste recycled, for example we have loads of cardboard and plastic which could all be recycled.	Noted.
PR15-1528	Costcutter Supermarkets, <i>Barbourne Road</i>	I'm not sure how to answer the questions but I would like to say one thing, if the council can recycle my waste into cupboards and plastic.	Noted.
NQ15-704	Eva Neale, <i>Warwickshire County Council</i>	Cross Boundary Movements: We are pleased to see that cross boundary movements have been considered and recognised as issues within the Core Strategy. We would also like to emphasise that SIMS Group at Long Marston does plan in important role for Warwickshire and particularly for the South of the county for processing scrap metals and waste electrical and electronic equipment.	Support noted.

Reference	Name/Organisation	Summary of comments	Initial officer response
NQ16-719	Hilary Berry, <i>Environment Agency</i>	The document appears to have appropriate safeguards, site selection criteria and policies in place to protect the integrity of natural features, legally protected sites and species and their supporting habitats.	Support noted.
PR22-579	Mr Plumridge, Great Witley and Hill Hampton Parish Council	I do not think that special kinds of Waste management facilities should be addressed in terms of their impact rather than what they are. The reverse should be true: The impact analysed and efforts made to convince, rather than placate or avoid public opposition.	A combination of factors must be taken into account when identifying preferred areas for waste management facilities. We will be developing a methodology for this through the course of 2010 and will be undertaking further consultation on this.
PR29-1650	Mr S Tranter	Industry must also embrace the concept, some are starting, the type of plastics used needs to be changed to more sustainable types (again recycling fully) This may have to be lobbied by government. We need less reliance on dwindling stocks of oil.	Noted.
PR37-1656	Mr C Rogers	Most of what we currently throw away can and should be recycled. Please lead the way in planning for a completely sustainable way of dealing with waste. When I look at my rubbish (black bag contents) all of it could be made of recyclable or compostable/biologisable materials. Plan for this eventual target within 10 years rather than planning to continue growing what we do at present. With our collective brains (the size of the planet) it can be done!	The Vision for the strategy recognises that we need to prepare for zero-waste to be our long-term goal. The strategy will be monitored annually and revised to meet future recycling targets. Objective 4 is to make implementing the waste hierarchy the basis for waste management in Worcestershire.
PR41-1658 PR44-1680	Mr Meredith & Mr R Meredith	The use of thermal treatment is a waste of our resources. Sort the waste-recycle and use anaerobic digestion.	The Waste Core Strategy is not technology specific. Thermal treatment includes a range of technologies, as set out in the background

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		To sustain the proposed efficiency of Thermal Treatment what happens to traffic carbon footprint delivering waste from far a field.	document <i>Recovering Energy from Waste</i> , available on our website www.worcestershire.gov.uk/wcs . We agree that wastes should be managed as close as possible to the source of their arisings. We do, however, have to recognise that there are economies of scale for some facilities.
PR41-1658	Mr Meredith	Having green policies at work it would be good to see that the council are able to practice what they preach.	Noted.
PR43-639	Dr I Fertin, <i>Far Forest Councillor</i>	The strategy looks at generating alternatives for recycling and source of waste but do not address the problem how to make people recycle, how the mechanism will be put in place to make people to participate. I still do not have recycling services at my home. Collect and people will do it. Provide a calendar with the description for collection.	This is beyond the remit of the Waste Core Strategy, but is being undertaken as part of the reviewed Joint Municipal Waste Management Strategy and is the responsibility of Waste Collection Authorities (District Councils).
NQ25-672	A Brodrick <i>White Ladies Aston Parish Meeting</i>	Worcestershire County Council Planning Validation Document: We are interested to see that this document is currently under consultation and trust that the issues expressed in this document dovetail well with your Waste Core Strategy.	Noted, the Waste Core Strategy and Validation Documents are being developed in tandem.

Reference	Name/Organisation	Summary of comments	Initial officer response
NQ26-735	David Berry, <i>The Coal Authority</i> <i>(Comment summarised by WCC)</i>	<p>Surface Coal Resources and Prior Extraction: Although it is acknowledged that the Worcestershire WCS does not cover minerals specifically, you will be aware that the Worcestershire area contains coal resources which are capable of extraction by surface mining operations. The Coal Authority is keen to ensure that coal resources are not unduly sterilised by new development....where this may be the case, the Coal Authority would be seeking prior extraction of the coal. Prior extraction of coal also has the benefit of removing any potential land instability problems in the process.</p> <p>.....Whilst most past mining is generally benign in nature, potential public safety and stability problems can be triggered and uncovered by development activities. Problems can include collapses of mine entries and shallow coal mine workings, emissions of mine gases, incidents of spontaneous combustion, and the discharge of water from abandoned coal mines. These surface hazards can be found in any coal mining area, particularly where coal exists near to the surface.</p> <p>.....in some geological conditions cracks or fissures can appear at the surface. In our view, the planning processes in coalfield areas need to take account of coal mining legacy issues. The principal source of guidance is PPG14, which despite its age still contains the science and best practice on how to safely treat unstable ground.</p> <p>Within Worcestershire there are approximately</p>	<p>The County Council will look at the information provided by the Coal Authority regarding the extent of these resources and consider how this may influence any constraints mapping activities and site allocations.</p> <p>Changes to be made to show "Coal Safeguarding/potential Coal hazard Areas" on Key diagram or Constraints diagram and to refer to the need to address mineral safeguarding and hazard issues.</p> <p>Minerals issues will be addressed further in the proposed Minerals Core Strategy.</p>

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		<p>240 recorded mine entries and 3 other coal mining related hazards. Mine entries and mining legacy matters should be considered by the Local Planning Authority to ensure site allocations and other policies and programmes will not lead to future public safety hazards.</p> <p>..... Draft Policy Directions WCS2-WCS4: Whilst the Coal Authority has no particular preference for any spatial development option in relation to the location of new waste management facilities, it should be noted that there are a number of coalfield areas within the north and northwest of Worcestershire...in the following broad locations:</p> <ul style="list-style-type: none"> • The Bayton/Mamble/Menithwood/Abberley area in the northwest of the County; • A small area to the west of Stourport-on-Severn; and • An area to the northwest of Kidderminster, concentrated on the Shatterford/Upper Arley/Pound Green area. <p>....in accordance with the guidance in MPS1 and MPG3, consideration should therefore be given to whether any waste development proposals within these locations would lead to the sterilisation of coal resources. If this is likely to be the case, consideration should be given to whether there is potential for the extraction of coal resources in advance of the development and if necessary, incorporate suitable mitigation measures to ensure that the development is safe and stable. The Coal Authority therefore</p>	

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		<p>considers that the Waste Core Strategy should contain appropriate policy criteria to ensure that these issues are properly addressed when assessing proposals for any new waste management facilities (either allocated or unallocated) within the above locations.</p>	
NQ29-1162	<p>Cat Ainsworth, <i>Worcestershire Partnership Climate Change Theme Group</i></p>	<p>It is appreciated that Worcestershire's population will continue to grow and that economic activity will also continue to grow. Population and economic growth will create additional waste. Reducing waste will only be achieved by focusing on waste minimisation combined with effective recycling.</p> <p>A new economy constructed around waste management is developing and this will create new employment opportunities. Some of these jobs should be created in Worcestershire as this will enhance regional economic resilience. It is recognised that there is a tension between strategies that are intended to minimise waste production and the realisation that waste is a resource that can create local jobs for local people.</p>	<p>Agreed.</p> <p>The Waste Core Strategy is being developed to consider these issues.</p>
OQ5-547	<p>Yvonne Scriven, <i>Chaddesley Corbett Parish Council</i></p>	<p>A great deal of our time is devoted to disposing of waste generated by unnecessary packaging. The County Council is at the end of the chain, the top end of which is occupied by manufacturers, retailers and especially supermarkets. We feel very strongly that a way should be found of ensuring that the principle of the "polluter pays" is</p>	<p>Noted, this is currently being pursued as part of national government policy but is beyond the remit of the Waste Core Strategy.</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p>enforced. We feel that there should be vigorous dialogue between the waste generating organisations and waste disposal authorities. This dialogue should have as its priority reducing the amount of totally unnecessary packaging. It would also have the effect of reducing the demand on resources, which is becoming ever scarcer. The supermarkets have 'got away with it' for years by claiming the high ground of collecting waste packaging for recycling. The government must pursue a most robust position. Taxation is not the answer, they just pass on the cost to suppliers and consumers.</p> <p>Legislation and punitive fines and HMG should introduce the obligation to reduce waste packaging. It is also noted that businesses have not yet engaged in re-cycling and do not have facilities available to them from local councils to do so. It is a pity that the policy does not address these issues.</p>	
OQ12-1280	Christine Hemming, <i>British Waterways</i>	<p>On page 7 of your document you state "The canal network is extensive and connects to systems to the north, south and east of the county.....As a general rule the capacity for increased freight movement by inland waterway or rail from and or within Worcestershire is not likely to be significant." This has been taken from the Worcestershire Local Transport Plan 2006-2011 which concentrates on the leisure and regenerative effects of the canal network and the projects in the Droitwich canals and in Stourport on Severn. BW would not wish the multifunctional</p>	<p>Noted, these issues are explored in the Background Document "<i>Inland Waterways</i>", available on our website www.worcestershire.gov.uk/wcs.</p>

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		<p>use of the canal network to be compromised by this emphasis. BW would point to the Transport Plans Appendix 2 SEA Environmental Statement Table 3 Item 14 "Manage waste according to waste hierarchy, encourage recycling and use of renewable resources." which as a conclusion to "Encourage use of canal network, expand regional processing capacity" BW consider that there is significant potential for the transport of waste on the River Severn and that this can only be realised by working with land use planners and operators at the early stages.</p>	
OQ13-1667	Mr A Murcott	<p>I think the council should prioritise its efforts to reduce the amount of waste produced, including by commerce and industry, it should aim to make less proportionate use of incineration and more of composting and AD facilities and the facilities should be scaled appropriately i.e. more small inobtrusive sites that are closer to the sources of waste rather than fewer large sites which necessitate the transportation of larger quantities over greater distances.</p>	<p>Objective 2 aims to minimise waste production and the Council is pursuing this through its economic development function. We agree that education has an important role to play in achieving the minimisation of waste. This is beyond the remit of the Waste Core Strategy, but is being undertaken as part of the reviewed Joint Municipal Waste Management Strategy.</p> <p>The Emerging Preferred Options paper is not technology specific and seeks to allocate land for all kinds of facilities, which could include both thermal treatment and AD facilities.</p> <p><i>Worcestershire Waste Core Strategy Background Document: Recovering Energy from Waste</i> considers issues relating to both thermal treatment and anaerobic digestion. We agree that wastes should be managed as close as possible to the source of their arisings. We do, however, have to recognise</p>

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			that there are economies of scale for some facilities.
OQ14-1683	R Wlckens	No incinerator please	Noted.
OQ16-626	<i>Norton-juxta-Kempsey Parish Council</i>	<p>Need more emphasis on reducing waste, particularly commercial and industrial.</p> <p>In deciding location and means of transport need to consider the 'cost' of transport not just financially but on CO2 emissions and impact on congestion.</p> <p>Need to consider the financial impact on those living close to waste facilities and take account of this.</p>	<p>The Vision for the strategy recognises that we need to prepare for zero-waste to be our long-term goal. The strategy will be monitored annually and revised to meet future recycling targets. Objective 4 is to make implementing the waste hierarchy the basis for waste management in Worcestershire.</p> <p>Agreed. Policies will be developed which promote sustainable transport and consider the impact of new development on the transport network.</p> <p>The impact of development on property values is not a material planning consideration and can not be considered in decision making. The Waste Core Strategy will however address issues relating to residential amenity and other impacts on the locality.</p>
OQ21-670	Councillor Dawn Merriman, <i>Warndon Parish Council</i>	We are pleased to note that it is anticipated that Worcestershire is likely to have almost sufficient planning permission to satisfy its needs for waste facilities, based on the Waste Strategy calculations up to 2027. Totally agree with the principle of less movement of waste, by locating more waste facilities around the region.	Support noted.
OQ28-696	Deborah Klein,	The document takes little account of cross-border	In accordance with the Panel

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	<i>Herefordshire Council</i>	collaboration in terms of modern spatial planning. The JWMS contract which conjoins Herefordshire and Worcestershire until 2026 can be viewed as an asset or a burden, but it does offer opportunities for more joint working which the WCS could develop. Proposals for future sustainable waste management solutions should take account of such close relationships and perhaps include other counties.	recommendations on the Phase Two revision of the West Midlands Regional Spatial Strategy we will base policy on the principle of 'equivalent self-sufficiency' but taking into account cross-boundary movements of waste, some of which will be for the export of Worcestershire's waste out of county.
Issue: No comments			
NQ2-1068	John Harris, <i>Focsa Services (UK) Ltd</i>	Focsa Services (UK) Ltd own 50% of Severn Waste Services so feel it is inappropriate for them to respond.	Noted.
NQ3-564	Pam Craney, <i>Droitwich Spa Town Council</i>	The Town Council had no comments to make - it was on the Agenda for our Planning Committee on Monday.	Noted.
NQ4-732	Louise Dale, <i>Defence Estates</i>	The MOD has no statutory safeguarding concerns.	Noted.
NQ21-1298	Peter Brown, <i>South West Councils</i>	On behalf of the RPB, we will only respond with a further letter if we consider that there are significant issues relating to general conformity or alignment with the RSS.	Noted.

Conformity

This section includes comments from West Midlands Regional Assembly regarding the conformity of the Emerging Preferred Options document with the West Midlands Regional Spatial Strategy and the emerging Phase 2 Revision.

Reference	Name/Organisation	Summary of comments	Initial officer response
Conformity Comments			
NQ39-1140	John Pattinson, <i>West Midlands Regional Assembly</i>	<p>All the issues in the Waste Chapter of the WMRSS Revision have been addressed. The quantities of both MSW and C&I which it is proposed need to be managed do differ from those in Tables 5 and 6 of the WMRSS Revision but not significantly and the ratios for diverting waste from landfill are the same - or more challenging. In some cases the estimated quantities of waste to be managed are higher and in others lower. This was an issue discussed with the Panel and the Panel agreed that the figures should be "indicative".</p> <p>The quantity and distribution of new facilities are also in conformity with the policies in the WMRSS. There are additional policy areas relating to the reworking of old mineral sites and on the provision of waste management facilities in new development. Both these policies relate to Climate Change and Sustainability issues and are consistent with policies SR1-4 in the WMRSS revisions.</p> <p>I would support the draft policies in the Core</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p>

Reference	Name/Organisation	Summary of comments	Initial officer response
		<p data-bbox="712 252 837 284">Strategy.</p> <p data-bbox="712 322 1384 603">The waste policies in the Phase 2 Revision are relevant. There was a detailed assessment carried out on the previous document against all the 12 policies in the Phase 2 Revision and a number of points of explanation and clarification were requested in the conformity assessment. As the Regional Policy Lead Waste acknowledges the points have now been addressed.</p> <p data-bbox="712 641 1348 737">The document is in general conformity with the existing WMRSS and the emerging Phase 2 revision.</p>	<p data-bbox="1420 322 1509 354">Noted.</p> <p data-bbox="1420 641 1509 673">Noted.</p>