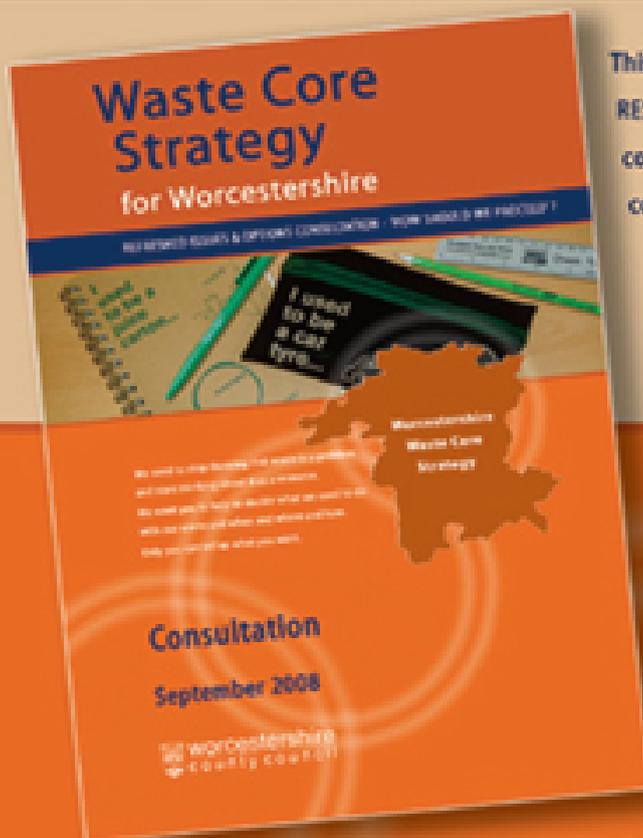


Waste Core Strategy

for Worcestershire

REFRESHED ISSUES & OPTIONS CONSULTATION - 'HOW YOU RESPONDED'



This REFRESHED ISSUES & OPTIONS CONSULTATION - 'HOW YOU RESPONDED' report has been produced in response to the comments received during the 'HOW SHOULD WE PROCEED?' consultation period 29 September - 19 December 2008



Summary of Consultation Responses and how we intend to address them

February 2009

Waste Core Strategy for Worcestershire

**Refreshed Issues & Options Consultation: 29th September –
19th December 2008**

How you responded, and how we intend to address your comments.

The Council submitted a “Waste Core Strategy: Regulation 28 Submission Document and Proposals Map” to the Secretary of State in January 2007. Following advice from the Planning Inspectorate and in anticipation of emerging government guidance it was clear that it would not be found “sound”. On 21st February 2008 the Secretary of State issued a letter directing the Council to withdraw that document and some of the preparatory work supporting it.

The *Refreshed Issues and Options Consultation* is the first stage of recommencing work on the Waste Core Strategy. The ‘refreshed’ consultation was made available for inspection and public consultation from 29th September until 19th December 2008. This document provides a summary of the points made during the *Refreshed Issues and Options Report* Consultation and our response to them. You can see a more detailed summary of who said what in response to each question in the “Summary Table of Consultation Responses” (February 2009) (an A3 booklet).

Please contact Nick Dean if you require any further information.

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Introduction

Refreshed Issues and Options Report

The Planning and Compulsory Purchase Act 2004 (“the Act”) introduced the current basis for Development Plans in England and Wales, the Local Development Framework (LDF). The Act puts Worcestershire County Council under a statutory duty to provide an LDF for waste, to be known as the Waste Development Framework. This may comprise the following documents:

- a Core Strategy
- site specific allocations of land; and
- maps to show the spatial extent of the policies.

Worcestershire County Council is preparing a *Waste Core Strategy* for Worcestershire. The *Waste Core Strategy* is a plan for Worcestershire’s waste and will provide a framework of how waste in the County will be managed from now until 2027.

The Council has prepared a *Waste Core Strategy: Refreshed Issues and Options Report*, which is the first stage in re-commencing work on the Core Strategy since its withdrawal by the Secretary of State. The ‘refreshed’ report brought earlier work on the *Waste Core Strategy* up to date and reflects the views of the people of Worcestershire obtained through previous consultations. It was made available for inspection and public consultation on the 29th September until 19th December 2008. A questionnaire was included in the consultation document.

Around 1300 letters accompanied by the questionnaire were sent to all people listed on the Councils consultation database. The consultation was publicised in local magazines, newspapers and the Council’s website. Full details of publication resources can be found in the *Regulation 30: Pre-submission Consultation Statement* available on request from Nick Dean, 01905 766374.

Copies of the *Refreshed Issues and Options Report* and the accompanying questionnaire were also put on the County Council website, in County Hall Reception, District Council Planning offices and all public Libraries in Worcestershire, and in the Council’s One Stop Shops at Bromsgrove, Droitwich, Evesham, Kidderminster, Malvern, Redditch and Worcester.

A follow up letter was sent to all the consultees on the 1st December 2008 in order to maximise the number of responses

Scope of the Report

This report summarises the responses received on the *Refreshed Issues and Options Report*. The report comprises a summary of responses to the questionnaire and comments made more widely on the report. In some cases further issues have been generated in discussions with stakeholders

Comments made by the Council’s Planning Officer follow the summary of responses. These comments are Officer comments only and should not be interpreted as those of Council Members, either individually or collectively and do not therefore represent Council policy. The comments set out how

we intend to address your comments and how they will influence the development of the *Waste Core Strategy*. In every case they should be interpreted as interim comments, both in the sense that our response may be revised as we develop the Strategy further and because the Council has not yet considered them.

It must be noted that not all response comments have been listed in this document. This document is purely our summary of essential points made during the consultation, to simplify and avoid repetition. Direct quotes have been used where grammatically sensible but the text should be seen as our interpretation, not as verbatim.

All the comments made during the consultation are set out in more detail in the companion to this report the Summary Table of Consultation Responses, which can be found at www.worcestershire.gov.uk/wcs.

Overview of Responses

Worcestershire County Council received 108 responses to the *Refreshed Issues & Options Report Consultation*; this gave a response rate of 8.3%.

Respondents included parish councils, local authorities in and adjoining Worcestershire, non-departmental bodies, West Midlands Regional Assembly, West Midlands Government Office, West Midlands Development Agencies, National Organisations representing the environment and transport groups, local businesses, waste industry and members of the public.

Breakdown of Responses

Most responses to the consultation were received by questionnaire, however some respondents replied by letter and e-mail and did not follow the questionnaire format. All comments received were treated as properly made and will be taken account of in preparing the Waste Core Strategy.

In this section each question included in the *Refreshed Issues and Options Report* questionnaire is reviewed individually. The pie charts display the quantity of respondents who answered yes, no and don't know to each question.

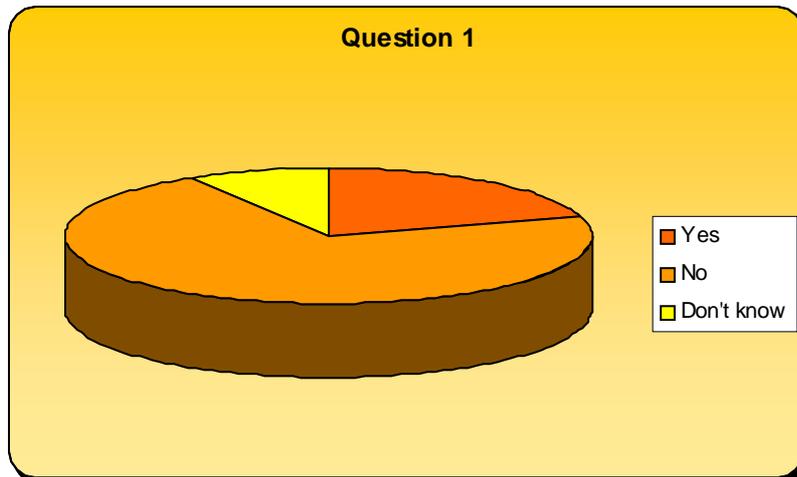
Additional Comments are listed in bullet point form under each question, the comments have been categorised as **Comments in support** of the *Refreshed Issues and Options Report* and **Other comments** relevant to the report. All comments relevant to a particular question in the consultation document or made directly as an answer to part a) or part b) of a question have been classed as additional comments under the relevant question.

The percentage of **all** the people who made additional comments during the consultation is given under each question.

Analysis

Question 1

Are there any other waste streams apart from those covered in the Refreshed Issues and Options Report you think we should address?



a) If yes, please could you describe what these are, and if possible, as much other information as possible, e.g. who they are generated by, where, in what volumes and how they are addressed at present.

15% of the respondents gave additional comments to the issues surrounding Question 1.

Additional Comments to Question 1

Comments in Support

No detailed comments were received in support of Question 1.

Other Comments

- Materials from the dredge of canals.
- Radioactive waste. Needs policies for the disposal of radioactive waste to link with national framework.
- Electronic equipment under WEEE Directive.
- Food waste.
- Road planings generated by Worcestershire

Highways; 2008 approx 300,000 tonnes.

- Waste brought from outside the County needs to be identified, specified and quantified as an additional waste stream.
- Consider net imports or exports of waste and any significant distortion this creates.
- Hazardous waste allocations should be adopted.
- Clinical waste treatment should be a waste stream.
- Should include emergency plans to identify temporary capacity for sorting and recovery of flood related wastes.

- Include the proportion of waste diverted to illegal outlets, e.g. fly tipping, illegal sites, unauthorised reprocessing activities or even exported. These activities maybe a significant distorting factor.
- There is a need for treatment/recycling infrastructure for construction and demolition waste, which includes contaminated wood, plastics, glass, plasterboard etc.

Q1 and 1A: Initial Response

Most commentators supported our initial proposal but other, potentially significant, waste streams were identified and will be addressed. We will address the following waste streams in the Waste Core Strategy:

- Municipal Solid Waste (MSW) and where possible the waste streams for the specific materials which make up this stream, e.g. Highway Gully Arisings.
- Commercial and Industrial Waste (C and I) including,
- WEEE and
- food waste; further information will be sought on whether these can be identified as separate waste streams and/or need special provision.
- Construction, Demolition and Excavation (C and D) including
- flood related wastes,
- dredgings and
- the need to manage sub divisions of the C and D waste stream.
- Agricultural Waste (where it is defined as waste under EU Waste Directives).
- Woodland Waste.
- Clinical Waste.
- We will also consult with DEFRA, GOWM, the Environment Agency and Primary Care Trust to assess the nature and scale of Radioactive Waste Arisings in the County, their current treatment and possible future needs to further assess if the Waste Core Strategy should address this waste stream and, if so, how it should do so.

We will also consult with the Environment Agency and Waste Collection Authorities to assess the extent of:

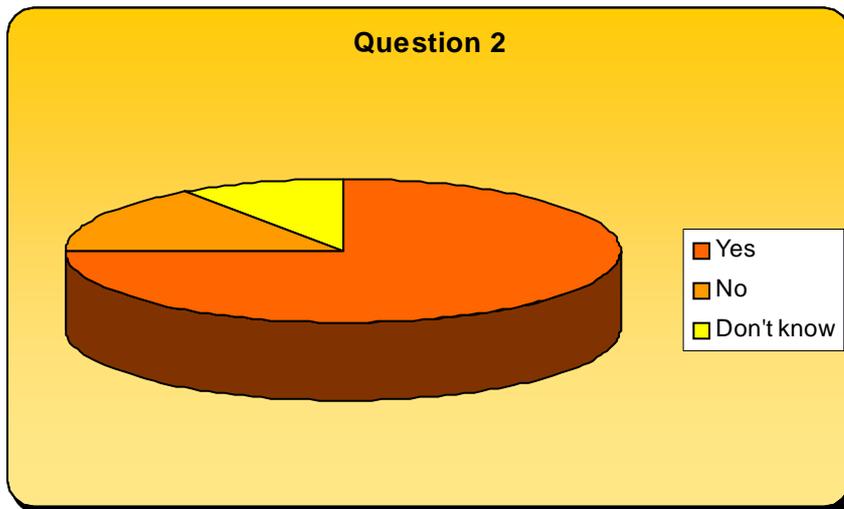
- Imported Wastes and
- illegal/unauthorised wastes to assess the extent and distribution of these and,

- o) in conjunction with the District Councils and Water Treatment bodies, whether the Core Strategy needs to address water and sewage treatment.

The comments to Q7 and 7A also relate to this issue and our response to Q1 and 1A should also be seen in relation to those.

Question 2

Do you agree that the Waste Core Strategy should not include specific policies to manage organic agricultural waste? This means that we will leave landowners and farmers to manage these materials as they have traditionally done, as fertilizers or soil improvers on the land holding where it arises.



- a) If no, please could you give examples of what such policies should cover and as much information as possible on why you think that is necessary.

15% of the respondents gave additional comments to the issues surrounding Question 2.

Additional Comments to Question 2

Comments in Support

- Acknowledges the rationale behind the proposal to exclude specific policies to manage organic agricultural waste and forestry waste.
- The strategy should include a statement to this effect.
- Agricultural waste uses are appropriate on farmland where it is generated, providing there is no potential for contamination.
- Waste arising from the urban environment to be put to beneficial use in the farmed landscape.

Other Comments

- The Council, Local and Central Government should be to help and assist private and commercial residents to “do the right” thing for the majority.

- If chemical fertilisers are used, could crop residue become contaminated and leach back into the soil?
- There should be some monitoring of how farmers and landowners are managing their waste.
- There is an opportunity to develop organic treatment facilities e.g. anaerobic digestion within the County; human and animal faeces (sewage disposal expansion) should be subject to anaerobic digestion to generate electricity.
- The strategy should be more flexible around accommodating future potential targets. Has been suggested that anaerobic digestion targets may be developed but no mention of how the strategy would respond to such changes.
- The next stage of the Waste Core Strategy should enable rather than constrain the potential relationship between the proposed excluded organic agricultural waste and waste streams addressed in the report.
- Waste products arising from generally rural land use (farm & forestry wastes) have a potential use as a resource for e.g. energy or other end uses.
- Land within the green belt and or around towns in rural areas offers particular scope for organic agricultural waste management.
- The strategy should leave scope for new approaches to these waste streams, related technologies and the interplay with wider waste management practices.
- Nobody should be free to dump waste as they please as ignoring agricultural waste creates loopholes.
- Policies should aim to minimise and progressively reduce the production of greenhouse gases, also to minimise watercourse and groundwater contamination.
- Organic Agricultural waste needs monitoring as there are links to cancers, MND, ME, MS, Other diseases.
- Storage limits and containment systems should be subject to some policy statement to prevent long-term storage and run-off to watercourses.

Q2 and 2A: Initial Response

Most responses supported our proposal. Some of the issues raised, e.g. the control of pollution or nuisance arising from the use of “organic” (non-Directive) waste, are outside of the Council’s control.

There are, however, opportunities for the treatment of agricultural wastes through:

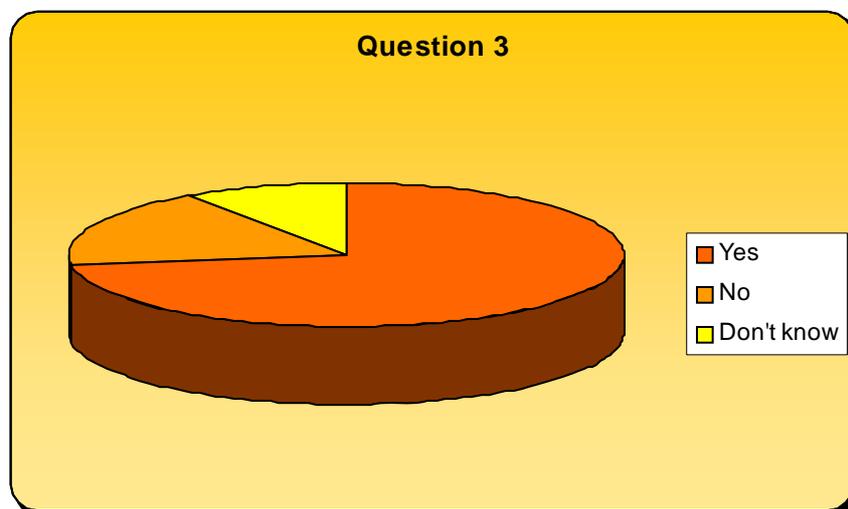
- anaerobic digestion, or
- as an energy source.

a) The Core Strategy will recognise these and ensure that provision is made to enable them to be undertaken.

b) The special ‘rural’ origin of these wastes and possible need for rural facilities will also be explored.

Question 3

Do you agree that the Waste Core Strategy should not include specific policies to manage waste from mineral working? This means that we will leave quarry and gravel pit operators to manage these materials in accordance with their planning permissions, as part of the restoration of the site.



a) If no, please could you give examples of what any such policies should cover and as much information as possible on why you think that this is necessary.

21% of the respondents gave additional comments to the issues surrounding Question 3.

Additional Comments to Question 3

Comments in Support

- Acknowledges the rationale behind the proposal to exclude specific policies to manage waste arising from mineral extraction.
- The strategy should include a statement to this effect.
- Supports the principle as long as mineral waste where possible is dealt with on site.

Other Comments

- Restoration of minerals workings should be monitored to ensure a good standard and fit for local environment; what happens if a quarry does not have a restoration scheme?
- The next stage of the Waste Core Strategy should enable rather than constrain the potential relationship between the proposed excluded mineral working waste and waste streams addressed in the report.
- Quarries are valuable potential sources for future landfill. The Council must be involved in quarry waste so the potential can be recognised and quarries should be part of waste solution programmes.
- Ignoring mining waste creates loopholes.
- Mineral wastes; there may be opportunities to co-manage or mix materials to create a new resource e.g. some wastes can go into cement or brick manufacture.
- Mineral waste and transport should be included in the strategy.

- Paragraph starting “In practice, as present all of the waste...” page 19 does not read very well and is not obvious what the author is trying to articulate.

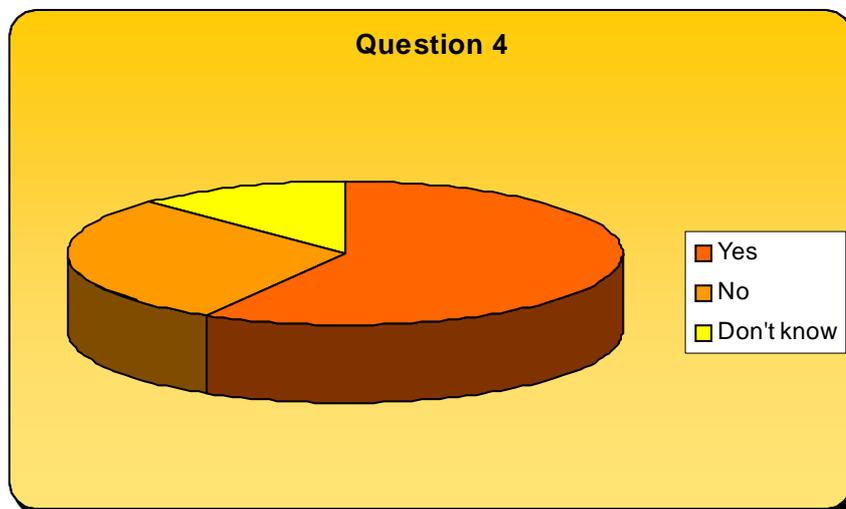
Q3 and 3A: Initial Response

Most respondents supported our proposed approach. A number of points were raised relating to the restoration of old and existing quarries, which will be addressed through both the Council’s Development Control and Monitoring regimes and the future Minerals Core Strategy. Most issues relating to the management of mineral wastes are either Permitted Development or subject to conditions on Planning permissions. We will, however, ensure that the Core Strategy:

- Enables the management of quarry wastes to create new resources;
- Recognises the transport issues related to the movement of quarry wastes off site;
- Recognises the theoretical potential for the use of quarries as landfill sites.

Question 4

Does the Draft Spatial Portrait include all the main local issues that should inform the Waste Core Strategy?



- If no, what else should we refer to?
It would be helpful if you could also refer us to other sources of information or to people we could contact to explore these issues further.

27% of the respondents gave additional comments to the issues surrounding Question 4.

Additional Comments to Question 4

Comments in Support

- Welcome the recognition of cultural factors in the landscape as an issue with specific relevance in Worcestershire.

Other Comments

- The strategy ignores problems caused by traffic travelling to and from waste sites.
- Not enough emphasis on personal liability and responsibility for waste products created.
- Needs more emphasis on financial gain and reward for reducing waste/ pre-sorting or making waste a commercial asset.
- The list for informing the Waste Core Strategy is not specific enough. It does not specifically detail the production of carbon dioxide as a measure of what we do with waste and how it is collected.
- Could archaeology be included?
- Energy generation could be a potential issue.
- Preservation of historic character of the Geopark, AONB, other historic parks and gardens in the County.
- Regards waste as a nuisance; this shows very little vision.
- General waste should be examined to see how it might be further exploited for recycled materials, mechanical treatment followed by anaerobic digestion to create methane to generate electricity.
- No reference to the Joint Municipal Waste Management Strategy (JMWMS). The two Counties planning frameworks should take account of each other especially when allocating areas for waste facilities.
- Effective commercial recycling from regionally dispersed businesses needs to be included.
- Issues are, cost to recycle (not to recycle), collection efficiency and CO₂ saving/loss from commercial recycling.
- Carbon footprint issues; fossil fuel usage and CO₂ emissions, effects of climate change, best value in terms of overall economics, cost/benefit analysis in terms of overall issues & costs to the community, compensation for those affected, reward for loss of amenity for those most affected.
- The portrait should be a factual description of the current geography of Worcestershire, with indications as to likely growth or economic/demographic change over the period of the strategy.
- There is insufficient clarity on how waste collection will be done in rural areas and on size/frequency of vehicles used for collection.
- Air pollution (e.g. incineration) airborne nuisances (e.g. odours, dust, flies) and vermin infestation. HGV impact on road system and communities. Impact on residential environment and amenities.
- Alternative scenarios and preferred options should also include reference to climate change.
- Excludes the Water Frameworks Directive and the effects thereof.
- Maybe a need to amend the spatial portrait in light of Nathaniel Lichfield & Partners (NLP) report/options and growth points. An increased number of housing will lead to further waste infrastructure being required.
- The cultural component of the portrait is very weak needs;

- More detailed overview of the landscape character and the County wide historic landscape characterisation.
- Detail the historic evolution and surviving historic character of the landscape; including an overview of the County's settlements such as its historic market towns.
- The Malvern Hills AONB should be referenced.
- Provide the context for more detailed site-specific information; the full range of designated sites for the historic environment should be referenced e.g. registered parks and gardens, registered battlefields.
- The importance of non-designated assets should also be clearly recognised, and the setting of designated assets is also an important consideration.
- Map 1: Registered Parks and Gardens, Registered Battlefields and Listed Buildings should be regarded as primary constraints in addition to scheduled monuments (and other nationally important remains).
- Information on the condition of an expanding range of designated historic assets is available through the English Heritage's Heritage Risk Programme and provides further information on the risk status of all scheduled monuments; the Worcester Battlefield is identified as at risk.
- The RSS description is too general. This section is ideally placed to include (even if briefly) locally distinctive issues identified at the national, regional and local level.
- Does not recognise the importance of future housing and employment growth around existing urban settlements or Worcestershire and most notably the settlements of significant development or Worcester City and Redditch, this is a locally distinctive issue.
- 11. Population Change: References need to be made to population migration as well population growth.
- Section 13 and 14: The October 2008 South Worcestershire Joint Core Strategy identifies several infrastructural issues (problems) that will act as potential barriers to Worcester City's economic and population growth.
- Several facts and figures are not referenced making it difficult to view the portrait objectively e.g. Paragraph 14.11, number of home workers. 15.1% of workforce?
- 15. Distribution of the population: 6th sentence seems poorly constructed trying to confirm the fact that Redditch is a settlement of significant development.
- Paragraphs 12.7 and 12.8 are incorrectly numbered, 12.7 states that Redditch is a District when it is a Borough.
- 16. Housing in Worcestershire: 16.1 (a) missing paragraph number last sentence ... which predicted targets were used – RSS, Local Plan, County Structure? There are two targets for Brownfield 60% and 70%, which one is this?
- Key diagram: Paragraph 14.7 states that 'the County is not a closed unit...' however the key diagram seems to resemble a closed unit.
- Include at least a summary of the spatial portrait in the strategy. The spatial portrait is important in setting the context for the issues & options & helping the Waste Core Strategy to be locally distinctive.

- Use a diagram to show waste movements, the key urban areas & cross boundary issues.

Q4 and 4A: Initial Response

This question elicited a lot of responses. They can be categorised into three broad groups:

- a) That the Spatial Portrait should be revised to focus on the factual characteristics of the County and with possible economic/demographic changes and specifically waste related possible implications for waste management being identified separately. We will revise the Spatial Portrait to do this.

Secondly, suggestions that the following issues should be considered:

- b) Consider how waste could be further exploited, e.g. to increase recycling, and to consider processes in combination to maximise resource gain rather than emphasising waste as a nuisance.
- c) Consider the expectations of the Nathaniel Lichfield and Partners Report on housing growth.
- d) Consider the special issues of regional and
- e) rural waste collections.

We will do all of these.

Thirdly, requests for the following to be added:

- f) Archaeological issues.
- g) Energy generation.
- h) The preservation of the historic character and features of the County, notably, the Geopark, AONB and historic parks and gardens.
- i) The Joint Municipal Waste Management Strategy.
- j) Air pollution; and
- k) The Water Framework Directive.

We will add all of these.

Fourthly, complex issues which need to be addressed during the course of developing the Waste Core Strategy, e.g.

- l) More emphasis on personal liability and responsibility for waste creation.

- m) The need to refer to Climate Change issues in other stages of the emerging Strategy, e.g. in alternative scenarios and Preferred Options.

We will include these.

Finally, some issues are at the margins of the planning system, even allowing for the broadest interpretation of what Spatial Planning might include for the availability of information, e.g.

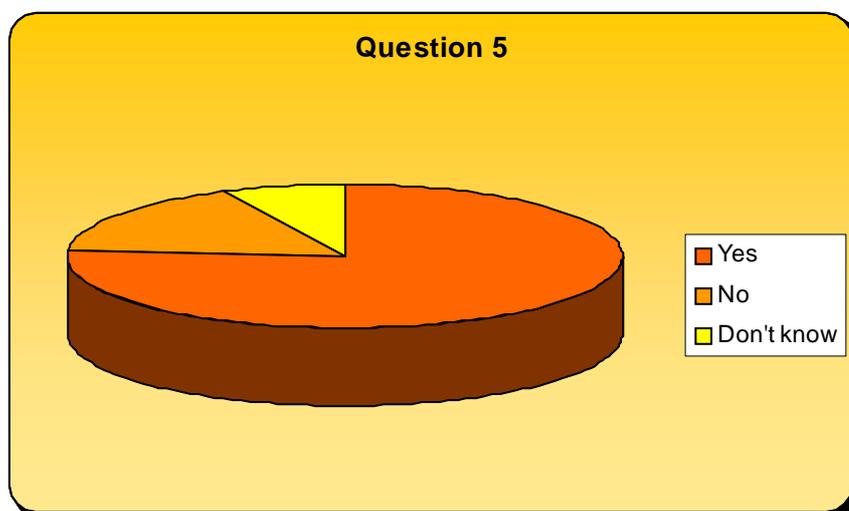
- n) The financial gain and reward for reducing waste or making waste a commercial asset.
- o) Detailing the production of carbon dioxide as a measure of what we do with waste and how it is collected.
- p) The cost of recycling or not, recycling materials either in financial or CO₂ terms.
- q) Carbon footprint, best value, cost/benefit analysis of waste management and
- r) compensating those most affected by waste management.

We recognise the appeal of these concepts and, in some cases, we may be able to apply these matters to waste under our own control. We will therefore consider these concepts in connection with Municipal Solid Waste. We are at a loss, however, as to both the practicability and propriety of applying them to the Waste Core Strategy. We will therefore reconsider them as the Strategy is developed but we will not be applying them in the foreseeable future.

The Spatial Portrait is one of the foundations of the Strategy; we will therefore consult again on it.

Question 5

Is this a good vision for the Waste Core Strategy to aim for?



a) If yes, is there anything you would like to add or remove? Please give as much detail as possible.

b) If not, what should the vision be?

48% of the respondents gave additional comments to the issues surrounding Question 5.

Additional Comments to Question 5

Comments in Support

- Vision is consistent with both the extent and emerging draft revision of the JMWMS.
- Pleased to see the emphasis of waste minimisation and treating waste as a resource.
- Broad aspirations in the vision are appropriate to the County and offer a sensitive driver for change.
- Generally good but leaves open the question of the needs of rural areas.
- Recognises and supports the principle of locating waste management facilities close to where waste is produced.
- Waste plants should be located in industrial areas.
- The draft vision is acceptable.
- Welcome that waste minimisation will be a priority for Worcestershire.
- Supports that waste management facilities will be located close to where waste arises. This is broadly in line with the approach adopted in the draft revised South West RSS.

Other Comments

- Vision needs to be short, punchy and rigid.
- Important to communicate the strategy in a simple way, vision should be kept to one side of A4– an understanding of it will make implementation much easier.

- Canal navigation can provide a freight route for the transit/movement of waste, reduce vehicle movements and help towards improving air quality
- Include 'However, to lend credibility to Local Transport Plan, policies on rail freight positive discrimination would be exercised to harness rail freight. Positive preference for water carriage'.
- Include in the vision that the Council will develop uses for waste materials to stimulate use.
- Domestic residencies affected by waste plants should be financially compensated; minimise the impact on the lowest number of people.
- Emphasize on the generation of wealth, jobs and energy for local areas served.
- 'Very little waste' is unattainable, as excessive & superfluous packaging commonly used by manufacturers to protect their product needs addressing/regulating first.
- The statement 'very little waste' is too vague, there needs to be a specific target.
- It may be better to say no waste to be disposed of in landfill and the reduction of CO₂ and reusable energy will be maximised. Unsure if the no landfill option is attainable.
- Revisit incineration option, which will lead onto hazardous waste and pre-treatment before landfill.
- Incineration should be considered by means of producing heating for homes and businesses.
- Local incinerators and maybe use the incinerator to fuel waste site to reduce costs.
- Vision should focus upon recovery of waste as a fuel for offsetting the energy used to process the waste into useful materials.
- By agreeing with the vision means agreeing with incineration.
- Not convinced landfill is such a bad option as voids in the ground will need filling after mineral extraction.
- Options for automatic sorting of waste?
- Better to say by 2027 all waste will be recycled in the most cost and energy efficient manner, consider what will be done with recycled materials e.g. will it be shipped to China?
- Liquid effluents from waste treatment facilities must be addressed as carefully as the initial wastes, and not just left to the water companies.
- There maybe benefits for some waste areas to be optimised by extending the area to include parts of Gloucestershire and Warwickshire in future plans – cross border buying and selling for our mutual benefit.
- Needs to have a system of monitoring to ensure changes in requirements are capable of being catered for.
- Use the districts housing allocations document to influence waste site allocations.
- Vegetation in gardens; more consideration should be given to free collection of this surplus waste.
- Encourage local responsibility and encourage involvement of colleges and universities in developing new technology.
- Joint arrangements including JMWMS with Herefordshire needs to be recognised in the detailed text underpinning the vision statement.

- Is the County Council up to date on best practice containment/ collection systems; underground systems, Envac systems and the efficiency, labour, CO2, public image, safety and cost benefits they can bring.
- Include paragraph tightening up commentary on revised locations and styles of waste management, would make a strong addition to the local focus of the vision statement.
- Vision to reflect the wider environmental benefits of better waste management (renewable energy, reduced emissions through less waste, lower transport costs etc) as a fundamental part of meeting the wider sustainable development aspirations of the County Council.
- The vision is impossible to achieve/ needs to be achievable i.e. aim to be in the top quartile of waste authorities in terms of waste management, efficiency and cost benefit to the community.
- The vision statement thereafter should not make any reference to where possible facilities might or might not be located, that is the job of the strategy and any subsequent documents. If the vision has to be more specific it should state that waste facilities will be located according to strict criteria based on, for example;
 - The type of waste and the sort of facility required
 - Proximity to arising
 - The usual spatial and environmental constraints
- Waste Core Strategy should commit to monitoring the progress of the National Waste Strategy in respect of manufacturers and retailing targets.
- Waste sites should be in sustainable locations, low flood risk areas (see PPS25 and sequential test and exception test), and with no adverse risks from contamination.
- Clarification sought on reduction of waste facilities suggested in Evesham and Pershore.
- The statistics in part 2 show that only 18% of waste is municipal waste, yet this is the area that the government spotlights.
- The vision should retain a strong and clear statement that future waste management will not damage natural or cultural assets.
- The vision specifically identifies flood risk, it is recommended that a similar reference is made to cultural assets i.e. site or setting.
- Should the vision also address the wider, but related, issue of behavioural change across all sectors and communities with respect to the waste cycle?
- Can all waste be regarded as a useful source of materials? Suggested clarification on the use of the phrase “useful sources of material”.
- Wish to see more explicit reference of the green belt.

Vision Statement suggestions

- Suggest using paragraph 2 Page 29 ‘It will be a change...’ as a basis for a revised statement. People need to be able to identify with and remember the vision easily.
- “By 2027, most waste management facilities will be in the broad area centred in and around Worcester and Redditch, as the settlements of significant development. Facilities will also be included within Kidderminster and Bromsgrove, commensurate with the lower levels of growth proposed for these settlements”.

- “Our goal is that by 2027 very little waste will be produced in Worcestershire and what is produced will be regarded as a source of useful material used beneficially and treated so far as possible in Worcestershire itself.”
- “Our goal is that by 2027 very little waste will be produced in Worcestershire, and that facilities and services will be in place to re-use, recycle, treat and recover value from what is produced, and safely manage the disposal of residues, so far as possible, within Worcestershire itself.”
- “Our goal is that by 2027 very little waste will be produced in Worcestershire & what is produced will be regarded as a source of useful material & treated so far as possible in Worcestershire itself according to the principles of sustainable development.”

Q5 and 5A: Initial Response

These questions generated the most additional comments from respondents. The Vision generally was well supported but a wide range of suggestions were made, notably:

- a) Alternative wordings for the Vision Statement, possibly
- b) through setting specific targets, e.g. to be in the top quartile of waste disposal authorities or by not disposing of waste to landfill, reducing CO₂ or maximising reusable energy.

We will revise the Vision to take account of these. We will include setting targets in the Strategy. We will consult again on which targets and whether they should be in the Vision. We will make it clearer but it is unlikely to be reduced to shorter as some respondents requested.

- c) Many respondents suggested additions or clarifications. We will include the following in the section of the Strategy supporting the Vision Statement
 - the potential for using inland waterways and railways;
 - that waste management facilities should generally be located in industrial areas;
 - that such facilities can generate wealth, jobs and energy;
 - the importance of addressing liquid effluents;
 - the potential for local colleges and universities in developing new technologies;
 - encouraging composting of garden and vegetable waste;
 - expressly referring to the joint contracted arrangements with Herefordshire for MSW;

- the importance of locating waste management facilities in sustainable locations, particularly with regard to flooding;
 - and will clarify references to specific towns in the Vision Statement.
- d) We will influence the Joint Municipal Waste Management Strategy to ensure that it considers the following (where this would be a more effective mechanism than the Waste Core Strategy):
- e) That the Council will try to develop uses for waste materials.
- f) Encouraging reductions in packaging.
- g) Encouraging best practice in the treatment of municipal waste.

We will recognise:

- h) That there is some local support for incineration as a waste management option. We do not intend, however, to specify the technologies which must be used. We will, however, address whether some technologies would be suitable in some locations.
- i) That the issues relating to landfill need to be further explored and will consult further on this.
- j) That cross border movement of waste may need further assessment.
- k) The need to use future housing allocations to influence waste site development.
- l) That better waste management is a fundamental part of meeting the Council's sustainable development aspirations.
- m) That monitoring is fundamental to the Strategy.
- n) That MSW is far less significant than C and I and C and D waste.

We will:

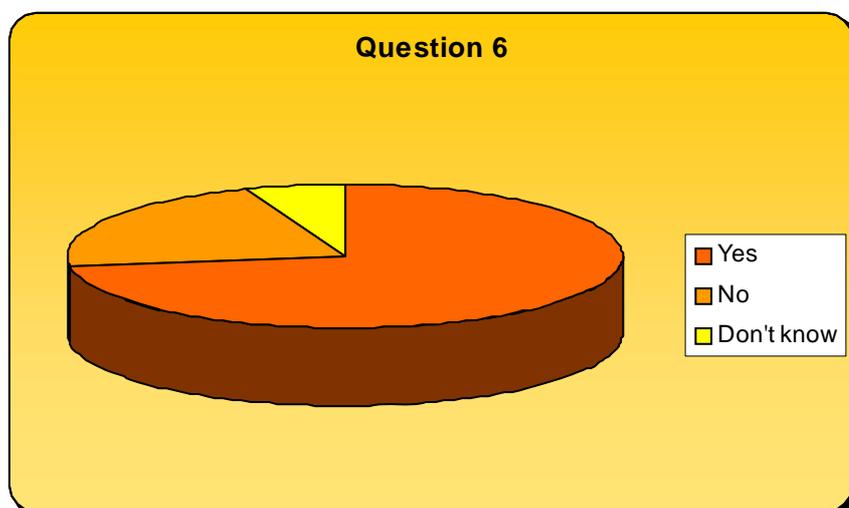
- o) Look at the relationship between the Vision and the detailed Strategy which follows from it. We will take GOWM's advice on whether it should refer to where possible facilities might or might not be located.

Because these changes are likely to be substantial we will consult again on the proposed Vision.

Some issues raised by respondents are difficult to address in the Waste Core Strategy. We cannot at present monitor manufacturers' and retailers' progress in meeting National Waste Strategy targets. Issues relating to financial compensation for residents adversely affected by waste management proposals are not relevant to the Waste Core Strategy and will not be addressed in it. We cannot control what is done with recycled materials to the extent of preventing their export to particular countries.

Question 6

Do you agree with the Draft Local Objectives?



Please feel free to comment or add any others you would like to suggest. Do not worry about precise wording, it will be as helpful to us if you can identify concepts or ideas rather than the perfect phrase.

25% of the respondents gave additional comments to the issues surrounding Question 6.

Additional Comments to Question 6

Comments in Support

- Support overriding objective concerning the protection and enhancement of the natural environment. It is essential that this principle is at the heart of all waste management and planning decisions.
- Yes so long as there is no reference to developing on the greenbelt.
- Broad support of the general thrust of the proposed set of guiding principles, and in particular the priority giving to conserving and enhancing the natural, built and historical environment.

Other Comments

- Caveat to 'Most Important' guiding principle p33. Add 'and visitors to the County'.
- Markets remain unidentified for many materials; only fall back position is landfill.
- The appropriate revised policy (page 33) generally overlooks the RSS sustainable transport policies where a much clearer commitment is needed.
- Where is the positive desire to convert excess waste to fuel?
- There is a need to take account of Herefordshire planning framework due to the Integrated Waste Management Contract.

- Addition of Geodiversity Action Plan.
- Unclear what 'locally distinctive' means in this context and concept of 'locally distinctive facilities' in the draft spatial objectives. Are household waste sites to be located and designed with respect to local distinctiveness? If so, how? There is no need to encumber the strategy with statements of this type.
- The test objective on page 33 needs to be flagged up as the 'ideal' or 'aspirational' objective.
- Protection, compensation and rewards for communities affected. Be cost effective, communities to be protected from adverse effects of waste developments, all waste developments to have negative carbon footprints and no health risks to communities.
- 'Adopt a precautionary approach' – this seems a little vague, and requires definition.
- "Involve all those affected" requires definition and substantiation. The phrase should be "to consult openly with all stakeholder and interested parties"
- To develop a network ... for Worcestershire... (i.e. local self-sufficiency), disregards the JMWMS, consideration of sub-regional issues, PPS10 and its companion guide.
- With regard to PPS10 C&I waste does not recognise administrative boundaries and PPS10 companion guide (Para 6.46) indicates that authorities should not restrict the movement of waste across borders where this would meet other objectives.
- The proximity principle no longer exists in English Waste Planning/Strategy and references should be removed. A better Guiding Principle (compliant with PPS10) would be: *"For communities to take responsibility for their own waste, with that waste being managed in accordance with the waste hierarchy at the nearest appropriate installation."*
- Useful to include examples where there might be apparent conflict with 'proximity' – e.g. economies of scale; long distance transport of low value/low pollution potential materials for the sake of recycling.
- Statements about reducing transportation by road imply consideration of alternative modes. Note that there are real limitations to this prospect, how many strategically located rail freight terminals are there in/near Worcestershire? What are the prospects of one being developed? (This limitation might feature in the Spatial Portrait).
- "Reflect the concerns and interests of local people and businesses." What does this mean? How?
- "To make it as easy as possible... to develop waste management facilities..." Please expand, give examples.
- The objectives are too broad. They need to be more specific. The guiding principles would make a better, more extensive & easier to understand list of objectives.
- Actively discourage those who flaunt the law and pursue through the legal system.
- Objective 1: 'Frameworks' to be added to the list. Uncertain whether the approach adopted for the objective is measurable and indeed deliverable due to the lack of expression of how waste planning and managing could impinge on the list of plans and strategies. An alternative approach could

be to draw out the main themes of the plans/strategies/frameworks listed and group these under economic, social, environmental themes including locally specific elements. This may have some overlap with the guiding principles, but they could be differentiated by a spatial reference. For example, under the environment an historic environment 'sub-objective' could cover aspects such 'as protecting valued historic assets and landscapes as identified in the County historic landscape characterisation and Historic Environment Record and safeguarding the character of the Counties historic cities, towns and villages'.

- Objective 2: The phrase 'locally distinctive' should be clarified and drawn out more from the Vision.
- It would be very useful to include an additional objective which is focused on environmental considerations in the planning and management of waste.
- Need to take account of the Worcestershire's City, District and Boroughs Local Development Frameworks as local information sources and potential cross County and Regional issues.
- Second local objective should be to create a network of facilities to address all waste produced in the County up to 2027.
- Draft objective 1 refers to planning for & managing waste in ways, which contribute to the achievement of other plans & strategies. The Core Strategy should be prepared within the context of those plans.

Q6 and 6A: Initial Response

Although only a relatively small number of people made comments on the proposed objectives, some of those comments were telling. In particular, GOWM and Mercia Waste (the Council's partner in the Integrated Waste Management Contract) raised serious concerns. It is in the nature of the process that the Strategy's Objectives should flow naturally from the Vision Statement. We intend therefore a) to revise the Vision Statement; and b) redraw the Objectives accordingly. We will consult again on the proposed Objectives once we have received GOWM's advice. At this stage, we can however state that although we anticipate revising how the Objectives are presented and expect to change the words used to express them, we do not anticipate dropping many of the Objectives. Most are basic to the planning system and are likely to be retained in some way. We will take account of proposals in Herefordshire and issues arising from the JMWMS.

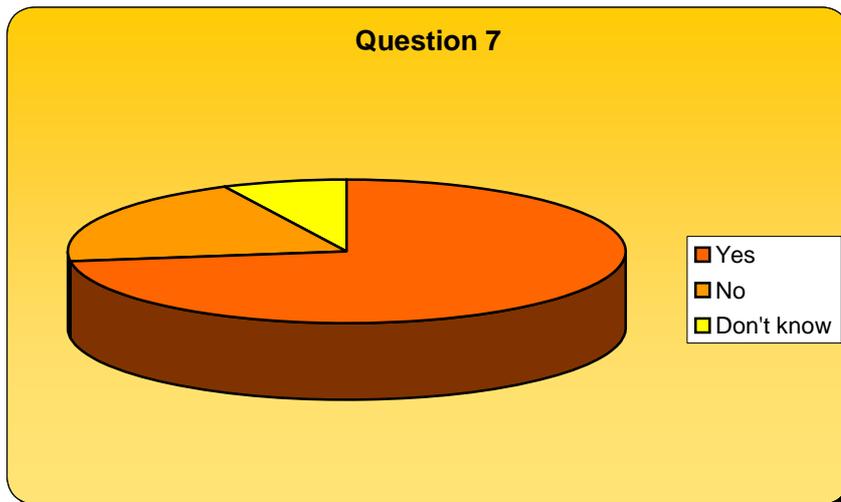
Question 7

We think that the Waste Core Strategy should deal with all of the following:

- **Municipal Solid Waste (MSW)**
- **Commercial and Industrial (C & I) (including Directive Agricultural Waste but not 'organic waste')**
- **Hazardous Waste, and**
- **Construction and Demolition Waste (C & D)**

But not Radioactive Waste

Do you agree?



a) If not, please could you explain why not?

20% of the respondents gave additional comments to the issues surrounding Question 7.

Additional Comments to Question 7

Comments in Support

- Agree to exclude radioactive waste although it needs dealing with if generated.
- Yes, hospitals?

Other Comments

- Construction and Demolition (C&D) waste should be kept separate from the Waste Core Strategy
- Why not include radioactive waste? Who deals with radioactive waste? Is it dealt with outside the County?
- Concerned that radioactive waste is not being considered. Low-level radioactive material is being produced by a variety of industries and is becoming more difficult to deal with.
- If a living document then nothing should be excluded.
- Should include measures of dealing with radioactive waste locally.
- Have a plant to serve both local agricultural requirements and public waste materials rather than have farmers installing small-scale anaerobic digesters.
- C&D waste is often re-used. Too much legislation will destine it to landfill not reduce it.
- Specifically identify any planned imported waste.
- Reference should be given to 'organic waste' and 'food waste' to accord with strategies being developed at a district level. Reference could be made to role of bio fuels and associated composting plants.

Q7 and 7A: Initial Response

There were only a small number of comments to these questions but the points made were very useful. In addition, GOWM and PINS informed us at a meeting with all of the Waste Planning Authorities in the West Midlands that government policy prescribes that nothing should be excluded and the Core Strategy will be framed accordingly. In practice, we intend to concentrate on:

- a) the waste streams that we can identify; and
- b) make provision to enable others to be assessed if applications for planning permission are made.
- c) We will nonetheless consult with DEFRA, GOWM, the Environment Agency and Primary Care Trust to assess the national scale of Radioactive Waste Arisings in the County, their current treatment and possible future needs to further assess if the Waste Core Strategy should address this waste stream and, if so, how it should do so.

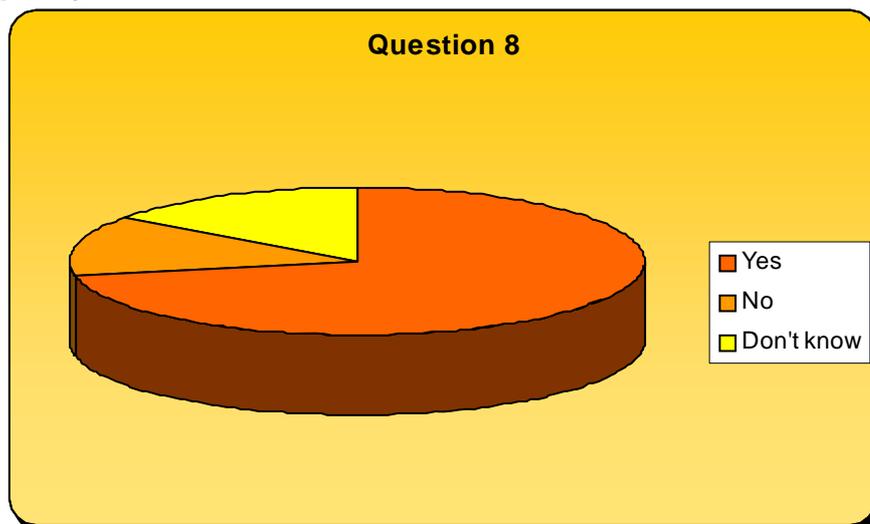
We will also:

- d) explore the nature of imported wastes on the strategies being developed at District level.

We do not at this stage, however, intend to specify the technologies or type of plant which should be used. It would also not be in accordance to keep C and D waste separate from the Waste Core Strategy.

Question 8

Do you agree that the Waste Core Strategy should be designed to provide sufficient facilities to meet the targets set out in national and regional policy?



- a) If not, please could you explain what other targets would be appropriate and why? If we were to set other targets we would need evidence to justify them. Are you aware of any such evidence?

14% of the respondents gave additional comments to the issues surrounding Question 8.

Additional Comments to Question 8

Comments in Support

No detailed comments were received in support of Question 8.

Other Comments

- Some waste products could be handled on a regional basis/context?
 - Targets are essentially political aspirations; the use of waste as a resource is intensely practical.
 - Exceeding targets should be encouraged, as it would set an example.
-
- A large expensive waste plant needs to collect waste from a wide area to be economically viable however this will have environmental effects.
 - Having regard to joint agreements with Herefordshire.
 - Local planning should be done on a local basis without unelected regional quangos dictating policy therefore local and realistic targets should be set. However, there is little evidence of local targets working to date.
 - Targets irrelevant if intending to import waste from outside the County.
 - The only target should be to reduce landfill to nil, meaning reducing facilities or stop waste being produced initially.
 - A risk matrix on your numerical model and identification of the issues that influence the figures would assist in answering the question.

Q8 and 8A: Initial Response

We anticipate having to design a strategy which sets explicit targets but is capable of responding to new targets in the future. We think it inevitable that more demanding targets will be set over the period up to 2027. Our initial response is therefore:

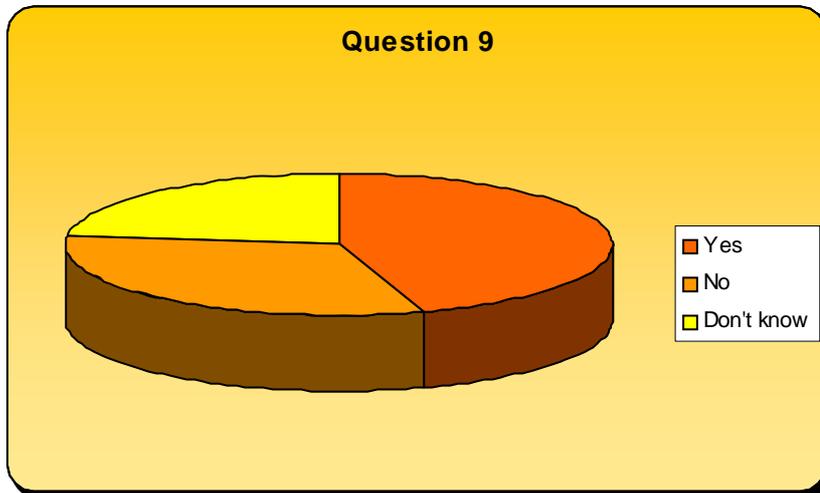
- a) to attempt to set more demanding targets than current government policy in the expectation that political aspirations will be more stringent over time.
- b) we also accept that we must have regard to joint arrangements with Herefordshire for MSW,
- c) must take account of imports; and
- d) must acknowledge that some wastes can only be addressed at a regional level.

We accept the appeal of a zero landfill policy and will work towards it but government policy requires us to recognise the continued need to landfill some wastes for the foreseeable future.

Question 9

Are there any subjects that you think we should measure to monitor the success or otherwise, of the plan?

Other Comments



a) If yes, please could you list these and if possible suggest sources for this information?

33% of the respondents gave additional comments to the issues surrounding Question 9.

Additional Comments to Question 9

In Support

No detailed comments were received in support of Question 9.

Other Comments

- Monitor how much of the waste is re-used or recycled compared to waste going to landfill.
- Measure the cost of new products/ packaging etc against recyclable products/packaging.
- Monitor diesel vehicles and what are CO₂ emissions per mile/km? How much electricity is used?
- Monitor carbon dioxide and other greenhouse gas emissions.
- Monitor the carbon footprint of the individual facilities, including transport biological load of liquid effluents.
- Monitor whether or not the system is efficient with regard to long-term sustainability objectives.
- Separate figures for recycled domestic, construction and commercial waste.
- Measure the revenue from recycling.
- Need to decide what waste treatment policy will be adopted. The degree of material segregation that the household will be asked to perform is a key factor.
- Monitor awareness of people in the County.

- JMWMS include targets for, and measures of reductions in MSW to landfill and recycling/composting. These are relevant and useful means of monitoring success of the strategy.
- The impacts of waste management on the local environment; biodiversity, geodiversity, green infrastructure, and the historic environment, as well as people.
- True commercial waste arisings, not just that collected by municipal trade waste, but including all private contractors. Data on this area is very poor unlike the data for municipal waste. Good plans require good data.
- Cost/benefit analysis involving all known aspects of/on behalf of the community, carbon footprint analysis.
- Monitor through the planning application process; there should be a periodic (annual?) review of the number of permissions granted and implemented, and the annual permitted capacity. Include details from ecological surveys.
- Need to back specialist facilities operating on a UK wide basis with implications to transfer.
- Financial saving for ratepayer.

Q9 and 9A: Initial Response

The comments made fall into broad types:

1. Matters we will be monitoring in the Minerals and Waste Local Development Scheme Annual Monitoring Report (the AMR), viz:
 - a) how much waste is reused, recycled or landfilled;
 - b) how the MSW, C and I and C and D streams are managed;
 - c) the number and kind of planning applications made and how they are determined;
 - d) the ecological gains and losses of such determinations;
 - e) annual waste management capacity; and
 - f) how the targets in the JMWMS are being met.

We will monitor all of these as part of the Waste Core Strategy and report them in the AMR.

2. Matters we will monitor through the Sustainability Appraisal (SA):
 - g) the SA Objectives; and
 - h) the effect on biodiversity, geodiversity, the historic and wider environment.

We will do all of these and report them in the AMR.

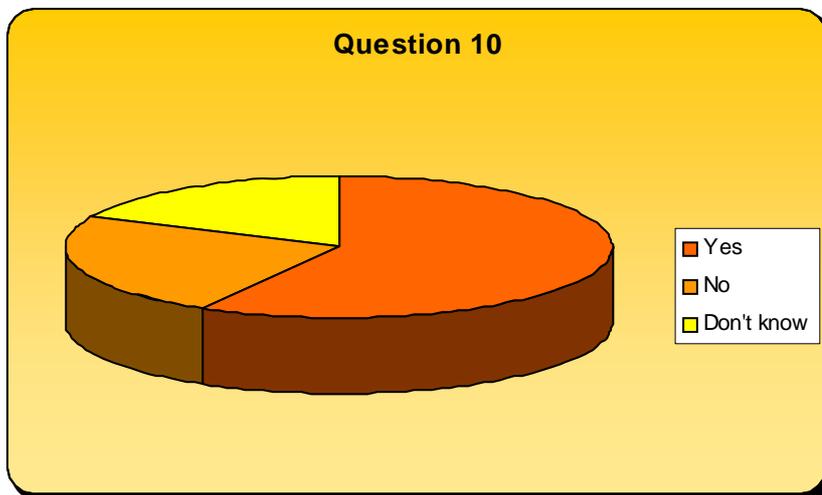
A number of comments however raised issues which, although desirable, are only at present possible for MSW (because this stream is entirely within the

Council's control). We will therefore note the following as desirable but at present they are not possible for other waste streams and will not be undertaken.

- the cost of new products against recyclables;
- CO₂ emissions;
- electricity use;
- the revenue received by waste management businesses;
- actual C and I and C and D arisings;
- cost benefit analysis;
- carbon footprint analysis;
- the implications of long distance waste movement; or
- the financial cost/savings of waste management activity.

Question 10

Do you agree that we should allocate the distribution of the new Commercial and Industrial and Construction and Demolition waste management capacity we need by District and Borough Council area?



26% of the respondents gave additional comments to the issues surrounding Question 10.

a) If not, please could you explain why and suggest alternatives.

Additional Comments to Question 10

Comments in Support

- Agree, however there is also a need to back opportunities for commercial waste recovery e.g. for 'autoclave' plant at Hartlebury Trading Estate.
- Agree that most logical approach to 'formally' allocating sites is by District & Borough Council Area.

Other Comments

- Develop larger plants that can process more efficiently in order to obtain best value.
- If it is the most CO₂ efficient way. If not centralised units may be beneficial.
- Is there a thorough understanding of the C&D waste generated?
- C&I should be handled on a countywide basis.
- Malvern Hills is a very long narrow district and as waste should travel as little as possible; Tenbury is closer to waste collection sites.
- Danger in making this too prescriptive by allocating district percentages.
- For some classes of industrial waste, have one centre for treatment of that class within the whole of the West Midlands.
- Question implies that type of waste produced by industry is not fully understood and thus only a guesstimate of waste type from each district is made.
- Better to establish dimensions of the problem before allocating solutions.
- Certain areas or districts have different geographical factors e.g. Malvern Hills with Redditch.
- Need evidence on whether district or county allocated waste management capacity works in other two tier County systems.
- Talk to private sector contractors in assessing this.
- All waste streams must be identified from points of origin to points of ultimate disposal and the locations of best overall cost benefit can therefore be identified and assessed, irrespective of borders for district/boroughs.
- C&I and C&D waste facility distribution cannot be made solely on a District and Borough Council basis. Waste treatment facilities (as opposed to recycling facilities) cost £ millions and will undoubtedly only be developed on a sub-regional basis (e.g. C&I, EfW or Anaerobic Digestion for catering waste).
- Waste movement will be subject to market forces/economies of scale/transport cost etc. Given the small geographical scale of individual Districts/Boroughs, administrative boundaries will be meaningless for these waste streams. The strategy should allocate facilities across all District/Borough, but focus on larger facilities in areas of the main waste arisings proximate to main transport routes.
- There is no harm in over allocation, under provision will stifle sustainable waste management.
- They have to go where they will be most effective. An arbitrary allocation makes no sense.
- Alternative locations could be decided based on accessibility and transport distances and nuisances.
- Setting areas is restrictive and may adversely affect cost benefits.
- No maybe to restructure

- Co-location of waste facilities to deal with different waste should be promoted, developing only one type of facility would be counterproductive as there is the need for further infrastructure using a range of technologies. Opportunities for merging of waste streams should not be overlooked.
- The plan should not seek to allocate at this level of detail, facilities will not respect boundaries. The plan should look simply at capacity requirements on a countywide level then identify sites for new facilities to meet that requirement & also provide criteria against which applications can be judged.
- First consider the prescribed broad spatial direction of growth, & then examine the most appropriate location for waste management facilities.

Q10 and 10A: Initial Response

The responses received illuminated a number of issues, which we will continue to address as we develop alternative scenarios. We intend to proceed on the basis that:

- a) The nature of many waste facilities is such that the economies of scale necessary mean that not every waste stream or every kind of facility can be addressed in every District. We intend to proceed on the basis that unless the RSS specifies locations for new facilities (which we must comply with unless there are good reasons to the contrary), we will develop scenarios which distribute locations for future facilities across the County in a number of different ways. We believe that basing these on District Council boundaries is a useful way of doing so and we will make this the basis for some of the alternative scenarios we develop.

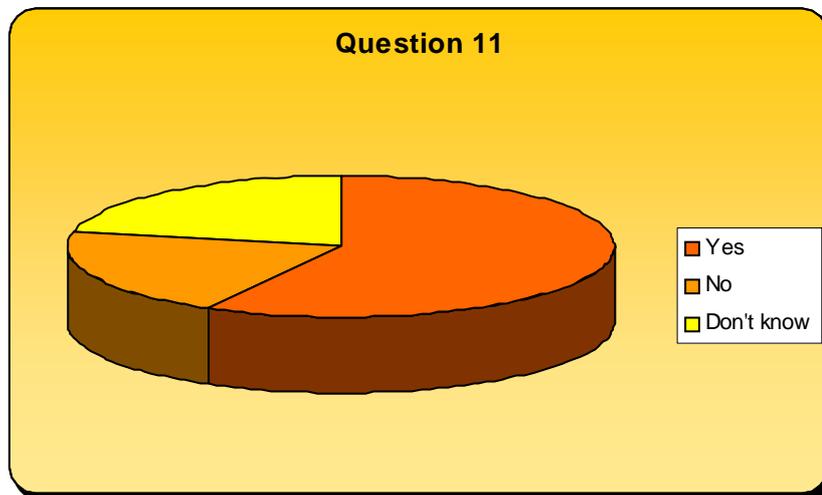
We agree with the comment made that:

- b) Ideally, waste should travel as little as possible.
- c) There is no harm in over allocation.
- d) Accessibility and transport are important elements in identifying sites.
- e) Co-location of facilities is itself desirable.
- f) Developing only one type of facility would be counter productive.
- g) Sites cannot be identified solely on the basis of administrative boundaries. We will, however, explore using District Council boundaries as one of the ways of setting alternative scenarios.
- h) That larger plants can be more efficient in some senses (this is shown in our suggested Options in 4b) and we will explore this as (at least) one of the alternative scenarios.

We note some commentators wish to make reducing CO₂ emissions of prime importance but this would not be in accordance with government policy and we cannot base the Strategy on it.

Question 11

Do you agree that this is a reasonable distribution of the new waste management facilities we need to manage Commercial and Industrial waste?



a) If not, please could you explain why and suggest an alternative.

21% of the respondents gave additional comments to the issues surrounding Question 11.

Additional Comments to Question 11

Comments in Support

- Agree with the approach to base the requirements for waste management capacity in line with the indicative long-term requirement for employment land with each district, as set out by RSS Phase 2 revision.

Other Comments

- Is Redditch's 17.7% adequate for industry in this area?
- Proposed planning documents may provide a better source for C&D waste.
- Percentage (%) for Redditch and Wyre Forest seem too small. % for Wychavon too large considering the little commercial/industrial activity there is.
- Why does Bromsgrove have a small percentage, as it is expanding/developing both commercially and in housing?
- Where is there land capacity within Worcester City boundary to develop new waste management facilities?
- Due to current economic climate these distributions are no longer correct; Bromsgrove & Redditch will have higher values in the current climate.
- The distributions are not relevant in overall cost benefit.
- Where is Kidderminster?
- The approach is wholly over prescriptive and will stifle development rather than facilitating it – PPS10 companion guide paragraph 6.46 indicates

authorities not to restrict the movement of waste across borders where this would meet other objectives.

- This is an arbitrary allocation. New developments have to be allowed where they will be most effective.
- Table D2 of PPS25 shows the different flood risk vulnerability classifications for different type of waste activity processes and table D3 gives compatibility of flood risk with the flood zones.
- Setting targets on historical data is unsafe particularly in current economic climate. The waste streams concerned will reduce so facilities must be able to cater for changes in the streams.
- Too detailed, should identify the capacity gap & outline in broad terms how this will be met. The strategy should also consider identifying strategic sites, which it currently does not mention.
- If local capacity is required then the County should split with Malvern, Worcester and Wychavon as one unit and Kidderminster, Redditch and Wyre Forest the other. Take advantage of economies of scale.

Q11 and 11A: Initial Response

Several respondents questioned either the proposed distribution between Districts or the principle itself. The distribution is based upon the RSS Phase 2 Revision proposals for industrial land:

- a) We believe that this is a useful idea for alternative scenarios, which we intend to develop further.
- b) We recognise, however, that responses to this and Q10 do suggest other possibilities, such as economies of scale. We will explore these. Some respondents emphasised the need for cost benefit analysis of proposals. We can do this for proposals for MSW and the JMWMS includes the consideration of these matters. We cannot make cost benefit analyses the basis of the distribution of C and I and/or C and D waste, both because we do not have any evidence on which to base such decisions and because it would not be proper for us as a public body to impose our assessments on what are principally commercial decisions. We will, however,
- c) make decisions regarding C and I and C and D waste on the basis of environmental considerations and will explore these as alternative scenarios.

Question 12

Question 12 is an open-ended question.

Do you think there are particular matters we should monitor? If so please could you suggest these and possible sources of information.

27% of the respondents answered Question 12 and gave additional comments.

Additional Comments to Question 12

Comments in Support

- Current measures are sufficient.
- All seems to be covered.

Other Comments

- Need to be aware of local opinion when locating waste sites.
- Ways of reprocessing waste – Anaerobic, aerobic, waste separation, energy from waste (CHP). Not just incineration or sustained landfill.
- Monitor how each local area is managing the strategy and whether or not they are commercially and sound based.
- A responsible audit needs to continually take place.
- Make recycling receptacles free to businesses. If receptacles were free more businesses would recycle = less to landfill.
- 'BPEO' should feature here so as to inform decisions regarding what to monitor and how.
- A periodic (annual?) review of the number of permissions granted and implemented, and the annual permitted capacity to deal with the waste arisings recorded.
- Achieving a figure, constantly reducing it to nil.
- Cost benefit, health and safety issues inside and in vicinity of facilities, carbon footprint and effects upon traffic.

Q12 and 12A: Initial Response

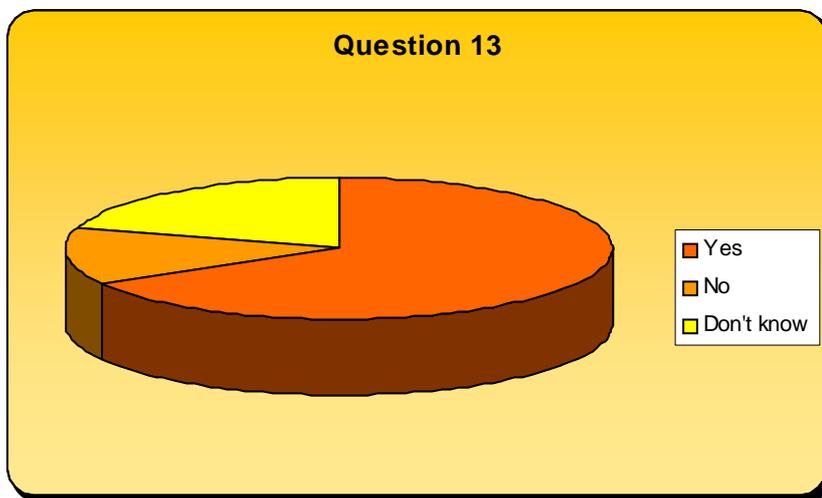
We set out a number of matters which we intend to monitor and will proceed to develop these. Respondents also suggested:

- a) A periodic review of the number of permissions granted and annual capacity permitted. Subject to how we calculate capacity (see Q13 below), we will include these in the AMR. We will also:
- b) Monitor progress on area basis but can only monitor whether facilities are commercially sound to the extent that they commence, continue to operate or cease operations. It would not be proper (or possible) for us to do more; and
- c) Monitor the different ways wastes are managed by (broad) technology groups.

- d) We can also monitor some matters which may be related to sustainability through the AMR; monitoring of the Strategy; Sustainability Appraisal, which would include some assessment of Health effects. We will consider this as we develop the SA. In general, however, we expect to rely on the Primary Care Trust for these matters. We will:
- e) Monitor all the targets we adopt, including the BPEO or zero waste targets, if we adopt these.

Question 13

**We intend to use “Actual Capacity”, the Environment Agency’s own site monitoring records to calculate Worcestershire’s waste management capacity. Do you agree that this is the best information available?
Other Comments**



- a) If no, please could you explain why and suggest an alternative.

12% of the respondents gave additional comments to the issues surrounding Question 13.

Additional Comments to Question 13

Comments in Support

No detailed comments were received in support of Question 13.

Other Comments

- Potential Capacity should be the aim.
- Actual real time figures should be monitored.
- Many local companies (contractors) are handling current waste streams and perhaps there will be more specific to meet the needs of the area rather than generic.
- Environment Agency (EA) do not monitor exempt sites close enough.
- ‘Notional Gap’ should be used, as this is what has been provided.

- Need to know what waste is produced before treatment, as we need to address/discourage fly tipping.
- Data accuracy: waste management facilities will have technical or other constraints on their operations (e.g. breakdowns, plant or infrastructure upgrading, transport problems, accidents, weather restrictions often landfills) or seasonal factors.
- Some EA capacity calculations are based on 'Bands' in the environmental permitting charging regime and may not be accurate.

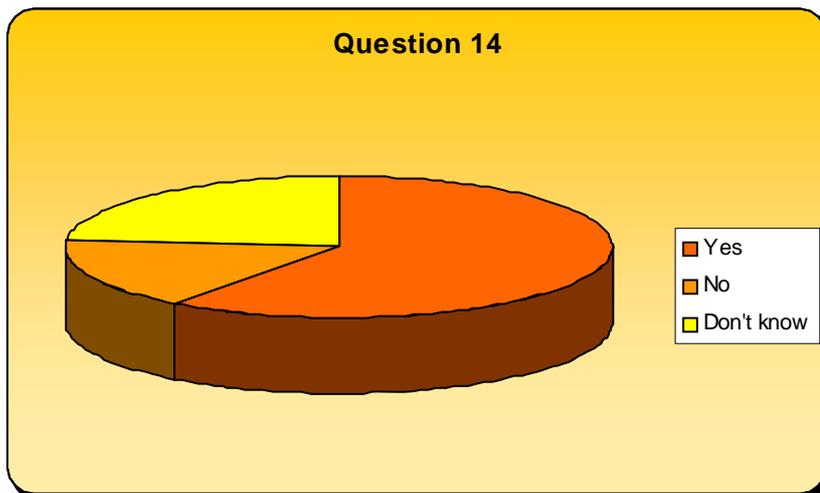
Q13 and 13A: Initial Response

There was only a limited response to these questions. The issue is fundamental to what we do and it is clear that there is no right answer. For the present, we intend to proceed on the basis proposed – of measuring 'Actual' capacity. We agree with the general point made that technical, EA "banding" and other constraints on operations mean that potential or notional capacity cannot be relied on and we believe that this supports our approach. We recognise that this method is not based on 'actual, real time figures' and may not account for exempt sites very well. We also recognise that 'Potential' and 'Notional' capacity do have some value however, and we intend to explore:

- How these measures can be used to help monitor the Strategy.
- Whether and how waste water treatment should be addressed and measured.

Question 14

We think however, that when it comes to estimating the "treatment gap" between how much waste management capacity we have and how much we need, that we should rely on comparing our "Actual Capacity" (as defined above) and the targets for diversion from landfill set out in the RSS. Do you agree?



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

14% of the respondents gave additional comments to the issues surrounding Question 14.

Additional Comments to Question 14

Comments in Support

No detailed comments were received in support of Question 14.

Other Comments

- Use gap between the 'Notional Capacity' minus 10% (to cover market conditions) and the targets for diversion from landfill (RSS).
 - What about landfill tax price movements of bulk recyclables as commodities e.g. the recent huge fall in prices.
- Must be a planned treatment gap for various sensible business reasons, it is pointless to rely merely on other figures.
 - Capacity required; nil waste to landfill.
 - Estimating the treatment gap should be based upon actual capacity and landfill diversion targets. However, objective is not to meet landfill diversion targets but to move up the waste hierarchy, therefore the strategy should over plan (beyond diversion targets) for recycling and recovery, but must also plan for sufficient landfill. There is no harm in over allocation, as the market will only bring forward development when it is economically expedient to. Under provision will stifle sustainable waste management.
 - Reference should be made to SLR report – 'A further resource for businesses'. Developing the evidence base for a targeted market intervention strategy for the West Midlands.

Q14 and 14A: Initial Response

Again, there was only a limited response and the issues raised reflect the uncertainties regarding Q13. We intend to concentrate on:

- a) Our original proposal to use actual capacity:
- b) – Notional capacity (with adjustments for market conditions) as one of the matters we monitor;
- c) – Different levels of recycling and recovery targets;
- d) – Zero landfill; and
- e) – The implications of significant changes in the values of recyclables,

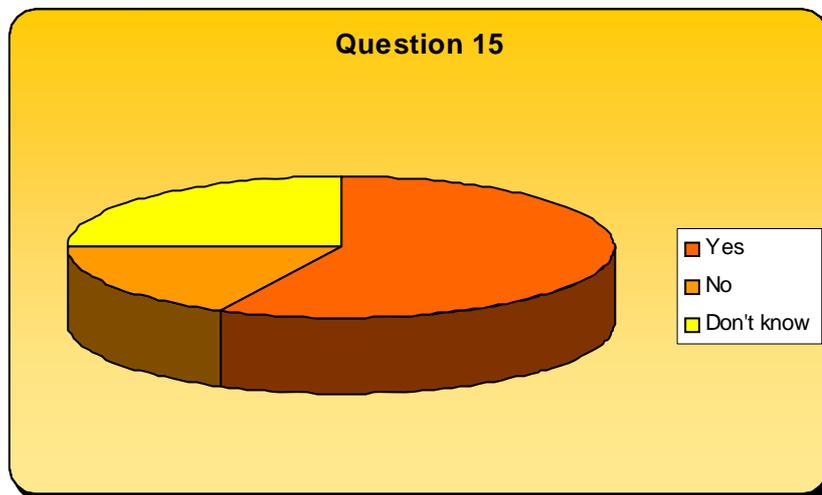
Question 15

We think that it would be useful to adopt the following ratios as a working basis to identify land for waste management purposes:

Open windrow composting	10,000t/2.5ha
Transfer stations	50,000t/0.5-1ha
All other waste management types	50,000t/1ha
Landfill	No set relationship because each proposal and site will differ. Approximately 10,000t/1ha @ 1m depth of tipping.

We will need to monitor this closely to see if the planning applications which come forward in Worcestershire, or other evidence, reflects this. If not we will need to revise the Strategy promptly.

Do you agree?



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

16% of the respondents gave additional comments to the issues surrounding Question 15.

Additional Comments to Question 15

Comments in Support

No detailed comments were received in support of Question 15.

Other Comments

- Can the possibility of energy product/production be pursued?
- To approximate for realistic appraisal.
- Incineration must be considered as it can generate power and often is the best option economically, CO₂ wise, and would reduce landfill.

- Amount of land may vary considerably depending on the type of processes intended. Plan the processes first then the necessary land take will be finite.
- Ratios are broadly ok except for landfill, which are meaningless. Landfill can only be planned for by identifying specific sites. The sites should be identified by a “call for prospective sites” from industry.
- What about figures for recycling? Incineration etc, are they not part of the mix?
- Different technologies have different requirements and this will affect the ratios. By 2026 there may be new and different technologies available also.
- These standards should be based on national standards.

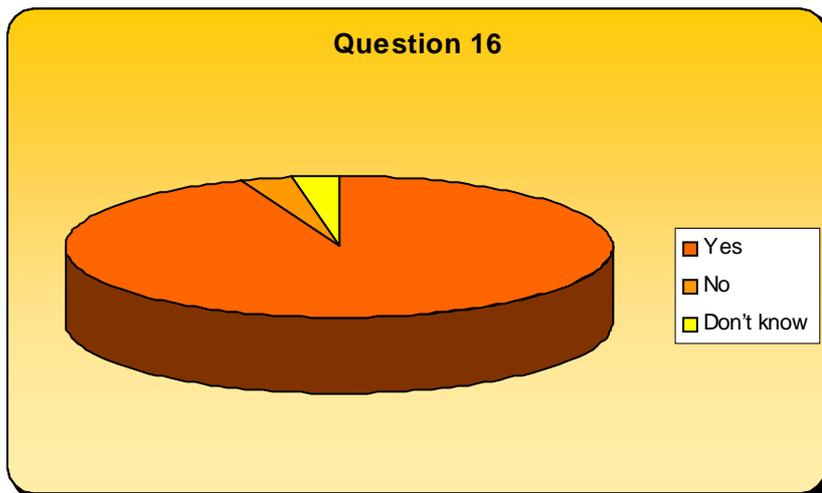
Q15 and 15A: Initial Response

- a) We intend to use our original proposal as the main way of developing alternative scenarios. Some commentators suggested that we pursue specific technologies, e.g. incineration/waste from energy. We believe that it would be more useful to use broad categories of kind of facility rather than specifics for the very reason raised by other commentators that new technologies will emerge, which we do not want to frustrate. We do not therefore want to identify or plan the processes we ‘need’ first, as some commentators suggest, because that could discourage innovation or prevent solutions, which the market is best able to identify. We recognise that the categories we have identified and the ratios proposed are approximate but we believe that they are useful as a way of developing alternative scenarios.
- b) There is considerable merit in calling for prospective sites from industry; and we intend to do so.

Question 16

Government policy is that the Strategy should be for at least 15 years from adoption. We expect this to be 2012 and that the Strategy should extend therefore to 2027. This will ensure both that it is compatible with the current RSS and able to pick up on the thinking for the next regional plan. During the course of the Waste Core Strategy we will also aim to monitor it annually and review it about every 5 years to keep it in line with future reviews of the RSS.

Do you agree with our proposal to prepare the Plan up to 2027?



2% of the respondents gave additional comments to the issues surrounding Question 16.

Additional Comments to Question 16

Comments in Support

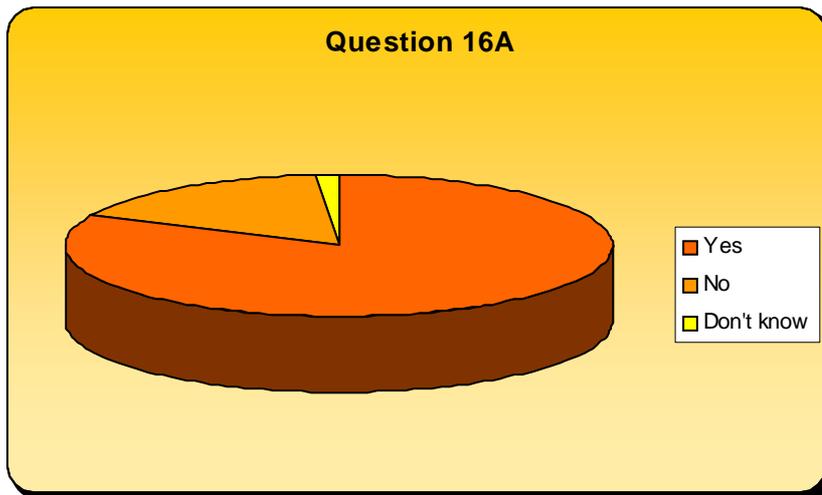
No detailed comments in support of Question 16 were received.

Other Comments

- To be monitored 1, 3 and 5 years.
 - Monitor monthly and review annually.
 - Review every 3 years. Cannot project accurately for 5 years.
 - Length of time to create Waste Core Strategy is too long.
 - Monitor annually, review bi-annually as demographics are constantly changing.
- Major investment needs a 25 year plan e.g. Sheffield's PFI with Veolia
 - Monitor annually
 - If an annual review shows problems this needs dealing with before the 5-year lapse.
 - New technology may change the outlook with a 5-year period.
 - The problem is the adoption date. It will take 5 plus years to implement new systems by which time the issues may have changed.

Question 16A

Do you agree with our proposal to monitor it annually and review it every 5 years? If no, to either of these, please explain why and suggest alternatives.



16% of the respondents gave additional comments to the issues surrounding Question 16A.

Additional Comments to Question 16A

Comments in Support

- Yes but the 5-year review should be in connection with the JMWMS.

Other Comments

- Review every 3 years, 5 years is too long.
- The frequency of the review should match other local authorities, if monitoring suggests a review earlier than 5 years then provision should be made for this.
- The time scale for the report is grossly excessive.

Q16 and 16A: Initial Response

We agree that:

- a) The review should link to that for the JMWMS and will do so if at all possible.
- b) We recognise that five years is a long period but it is the time recommended by government. We intend to proceed on this basis, but
- c) We will also commit to earlier reviews if our annual monitoring exercise suggests that more frequent reviews are necessary.

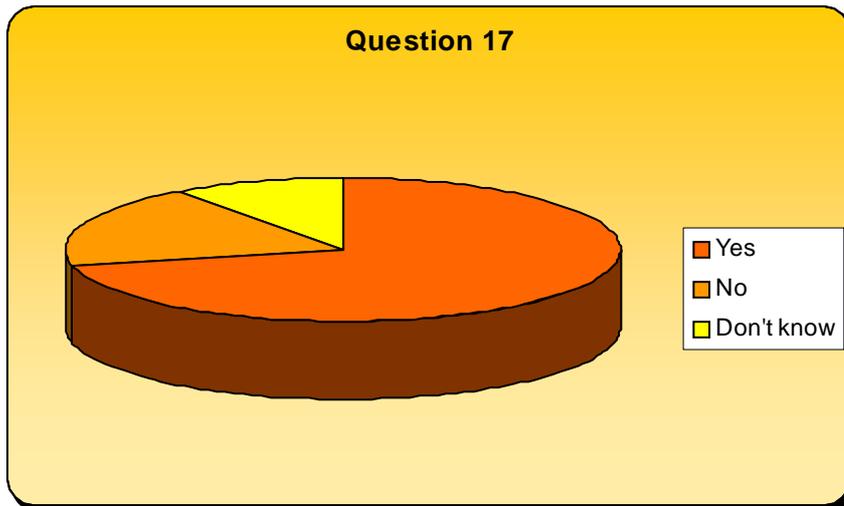
Question 17

We think that a useful way forward would be:

- To project the current RSS calculations forward for 10 years to 2036 in the light of new evidence and our own monitoring of the plan,

- To identify the scale of new waste management facilities needed to address these projections and the land area needed on the same basis throughout the period 2007 – 2036,
- To identify broad areas where these facilities would be needed but which would only be brought forward if all other appropriate allocations had been taken up first or could be shown to be unsuitable or unavailable,
- To reassess all of these at 5 yearly intervals in the light of new evidence and our own monitoring of the Strategy.

Do you agree?



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

16% of the respondents gave additional comments to the issues surrounding Question 17.

Additional Comments to Question 17

Comments in Support

- Support the principle set out for planning beyond 2027 & would wish to see that the impact, in transport terms, of these broad locations considered would be assessed.

Other Comments

- More emphasis on cutting down/ceasing of waste products. Any still created should be able to be regenerated as energy sources or renewable products.
- 5 years is too long a gap.
- The Council does not know how the Country and the County will develop in 5 years due

to the current economic climate, let alone the next 20-30 years. The latter period will be pure speculation and irrelevant.

- As waste generation decreases and nil approaches the need for new facilities should reduce and eventually disappear.
- Speculative and irrelevant.

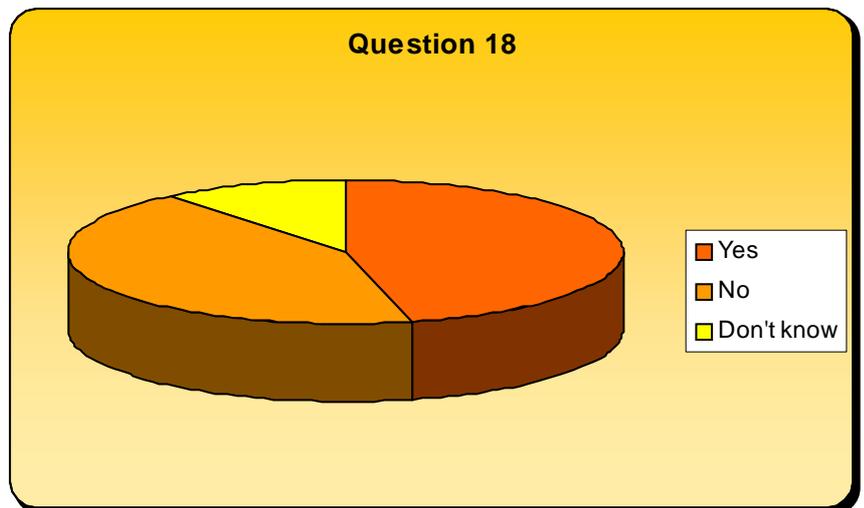
- It would be difficult to provide clear/meaningful guidance within this longer time frame. The time frame for the Waste Core Strategy should reflect the current RSS.
- Existing waste facilities should be helped to maximise capacity, then look for new sites.

Q17 and 17A: Initial Response

It is government policy that the Strategy should look beyond the time period of the RSS (i.e. beyond 2027). We recognise that such a long period can only be “speculative” but we must project the Strategy beyond 2027 and:

- Initially, we intend to do so to 2037 as proposed in the consultation. We will, however, monitor progress and revise our projections at least every five years. That monitoring will include broad sustainability issues including transport effects.
- We note the comments that waste reduction over time could be addressed by maximising the capacity of existing sites or energy generation and that in theory the need for new facilities to manage waste would disappear. We will assess such changes through annual and five-yearly monitoring and revisions of the Strategy.

18) Are there any other matters which you think we should take into account in order to protect the environment, health, employment and amenity of the people who live in the county when assessing the suitability of sites and areas for waste management facilities in the Waste Core Strategy?



30% of the respondents gave additional comments to the issues surrounding Question 18.

18a) If so, please could you list these below?

Additional Comments to Question 18

Comments in Support

No detailed comments were received in support of Question 18.

Other Comments

- There are a multitude of issues which need pursuing in regard to the minimisation of waste.
- Potential noise pollution. Noxious gas production.
- Impact of Light Goods Vehicles (LGVs) on vulnerable road users, militating against walking and cycling strategies, children's independent mobility, increase in Killed & Severe Injury (KSI) incidence.
- The extent of LGVs running empty.
- LGV cost externalised i.e. big 'take' out of society.
- Land use efficiency. Transport dimension of population density.
- Include information from Severn Trent Water on effluents from industrial waste treatment plants.
- Energy needs; plastic waste can create heat and power. Waste transportation efficiency (rail/water).
- Have regard for local parish plan and village design statements.
- There is a need to underline the sustainability of the project through, for example, recycling.
- Greenbelt sites have to be recognised. Recycling does not permit premium rate industrial sites due to handling a bulky low value product.
- Direct and cumulative impacts on the wider green infrastructure of the County: links between important habitat features also deeper 'ecosystem' links e.g. between river and floodplain.
- Important to recognise that all development can cause benefit or harm to the wider ecological links in the County.
- Expect the strategy to augment rather than fragment local green infrastructure.
- Council to apply will our own and government procedures, guidelines, rules and policies.
- Do not impose on local communities.
- Be truthful – a current failing, as the Council cannot be trusted.
- Undertake proper risk assessments and cost/benefit analyses.
- Consideration should also be given to;
 - Infrastructure capacity (e.g. Sewer capacity)
 - Potential co-location of waste facilities and the benefits that may arise
 - Proximity to synergistic concerns (e.g. power and/or heat off-take users, or recyclables re-processors)
- Traffic movements for access to be only on designated HGV routes.
- Joint working arrangements with Herefordshire Council.
- Once facilities are established, there should be strong presumption against subsequent encroaching development.
- Yes, but regard should be given to transport. Not only of waste material, but also staff associated sustainability issues.
- Consult local communities, parish and district councils as they know the area best, have to live there and deal with repercussions.
- It will not be possible to satisfy all parties in selecting sites. Council should be resolute in it implementation and not concede to narrow factional interests.

- Specific consideration to be given to the historic environment in terms of designated and non-designated assets and the settings, the historic character of the landscape and historic place, and associated aspects i.e. important views.

Q18 and 18A: Initial Response

This question elicited a lot of responses. Our intention is to take into account as many factors as possible when assessing the suitable locations for waste management facilities. We can assess proposals in a number of ways, notably through a Sustainability Appraisal of proposals. This could include:

- a) Transport impacts (of all kinds).
- b) Energy costs and benefits.
- c) Ecological change.
- d) Landscape change.
- e) Social costs and benefits.
- f) Pollution issues.
- g) Amenity issues.
- h) Cumulative or consequential effects.

We also note some correspondents' concerns about the need to liaise with local people and to recognise parish plan/village design statements. We will consult as widely as possible on the Strategy both as it develops and in its final, pre-submission stage. We recognise that some people do not believe that the Council has or will follow its own or government procedures. We can only emphasise that we will do so and that the entire process will be undertaken openly and is ultimately subject to review by the Planning Inspectorate, Ombudsman and the Courts.

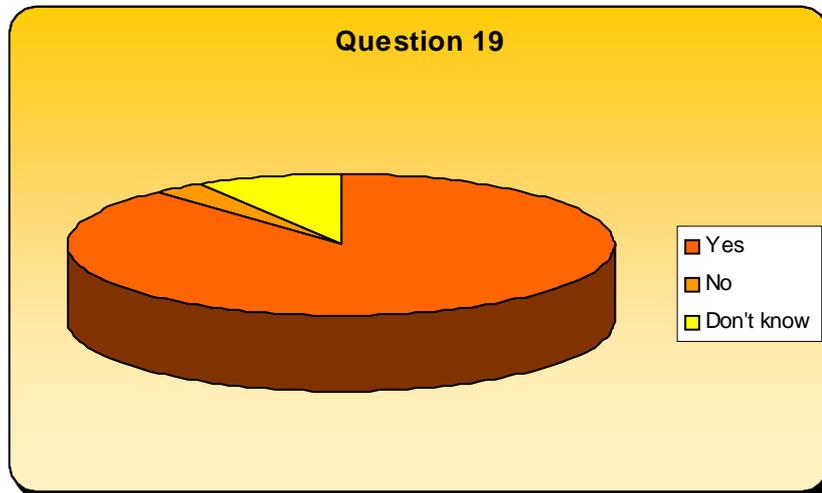
Question 19

It is inevitable that new issues will emerge as we develop the Strategy and that existing ones will change. It is possible to identify some matters now even if we do not know what they are. To date we have identified the following as important, the

- **RSS Phase 3 Revision**
- **River Severn Basin Management Plan**
- **South Worcestershire Joint Core Strategy**
- **Bromsgrove Core Strategy**
- **Redditch Core Strategy**
- **Longbridge Area Action Plan**

We think that all of these will identify the scale of change likely to take place in each area, the broad location of and some indicative timing for the changes likely and will guide what the Core Strategy needs to address.

We anticipate amending this list throughout the development of the Strategy, but do you agree that these will be important?



a) What else should we include?

17% of the respondents gave additional comments to the issues surrounding Question 19.

Additional Comments to Question 19

Comments in Support

No detailed comments were received in support of Question 19.

Other Comments

- Include, changes to the amount and type of waste generated in the County.
- Include how the natural world i.e. solar power from sun, hydro from rivers and dams, wind power can assist with energy production, waste disposal, transport etc.
- Consider the disposal of dredged material from the River Avon, if this is envisaged to mitigate flooding.
- The South Worcestershire Joint Core Strategy (SWJCS) will help give an idea for directions of growth.
- Include Countryside Access and Recreation Strategy, Parish Plans, Rights of Way Improvement Plan.
- Be aware of the fast changing (European) legislation that could impact these projects.
- Herefordshire Waste Core Strategy or equivalent document.
- AONB Management Plans should be included, have a 5-year timescale and will be revised at least four times during the life of the Waste Core Strategy.
- Include Worcestershire's Mineral Local Development Framework.

- If Birmingham grows more than anticipated, how will this be incorporated? What sensitivity analyses will be conducted?
- Population growth, immigration growth, shifting population.
- Add Regional Spatial Strategy Phase 2 material – as new development proposals will have an impact on waste management capacity and the JMWMS.
- The SFRA, The River Trent Catchment Flood Management Plan. Future Issues: Changes to the tax and regulatory regimes may have impacts.
- The River Severn Catchment Flood Management Plan is different from the River Severn Basin Management Plan.
- The ongoing County's historic landscape characterisation should be taken into account and other data sets including the County's resource of historic farm buildings.
- Wyre Forest Core Strategy should be included.

Q19 and 19A: Initial Response

We will take note of the following as proposed by consultees:

- a) Revisions to the RSS (both phases 2 and 3).
- b) Worcestershire District and the adjoining Councils' Core Strategies.
- c) AONB Management Plans.
- d) Worcestershire District and adjoining Councils' SFRAs.
- e) The River Severn Catchment Flood Management Plan.
- f) The County Council's own plans, including the Countryside Access and Recreation Strategy related plans and the County Climate Change Strategy.

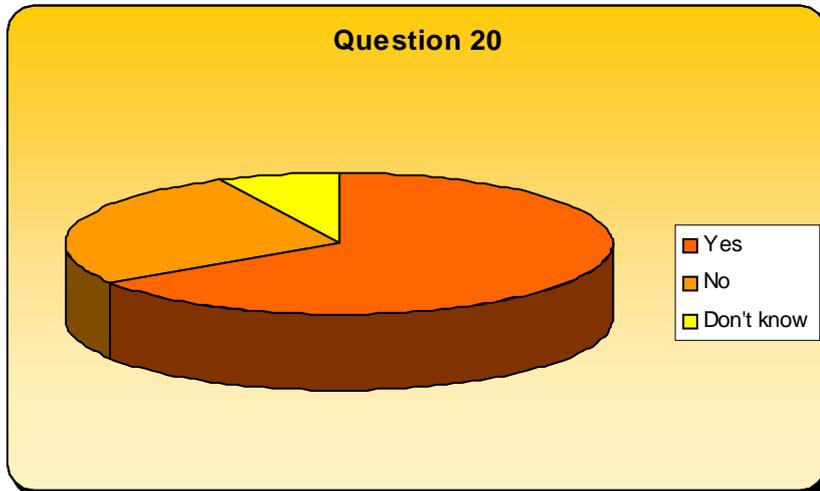
We will also remain open to considering other plans as they emerge. It is very likely, for example, that some of the suggestions made will develop into specific proposals that we can address.

Question 20

Do you agree that we should develop the Waste Core Strategy on the basis of the following options:

- A3 That new waste development is appropriate any where in the Green Belt when in accordance with the objectives of Planning Policy Guidance 2;**
- B1 To focus on development in urban locations throughout Worcestershire with justified minimal development in rural areas;**
- C1 To establish primarily larger waste management facilities;**

- D1 To focus on centralising facilities, but with dispersed facilities if justified; and
- E1 To incorporate the adopted BPEO Strategy into the Waste Core Strategy.



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

28% of the respondents gave additional comments to the issues surrounding Question 20.

Additional Comments to Question 20

Comments in Support

- New waste development proposed in the greenbelt should be appropriate and in line with PPS2.
- The options appear generally sensible and in accordance with the thrust of national policy they do not take full account of the types of waste and particularly the full range of waste facilities that are required.
- Agree generally, but with room for flexibility and unique circumstances. For instance, large landfills will probably have to be in rural locations.

Other Comments

- Encourage the use, improvement and safeguarding of the canal corridor.
- Establish means of disposal and then apply them to area, available land and facilities, e.g. CHP ideal for eco-villages. Landfill always needed adjacent to towns. Digesters and incinerators needed adjacent to medium towns.
- Mixture of larger and smaller waste management facilities would better enable facilities to be placed near where needs arise. Plus this would provide more diverse facilities and larger facilities would attract more opposition.
- Some farms have anaerobic digestion plants therefore it is not sensible to place any limit on rural location.

- Greenbelt sites need to be recognised.
- A3 should be more relaxed.
- Don't agree with A3 – generates traffic and environmental nuisances that should be contained in urban areas.
- C1 - larger sites create more impact.
- C1 - too prescriptive at this stage. The plan should identify land that is potentially suitable for development of sites to meet the required waste management capacity.
- D1 more transport = carbon footprint.
- This option could have damaging effects on the site and setting of historic assets and hence should the option allow some degree of flexibility for smaller facilities if justified e.g. as per option D1.
- The list is too simplified and inadequate. Some ignore common sense, commercial factors and have negative cost/value basis. Some dispute other fundamental waste development principles, such as the proximity principle.
- References to BPEO need to be played down as the JMWMS is under review and thus needs to be monitored as to whether BPEO will still form a component of the 'assessment' of the reviewed strategy.
- Explanation of implications of not incorporating the BPEO strategy would be of use and help to understand the options more fully.
- The concept of BPEO no longer has any policy basis & should not be referred to in a newly emerging plan.
- Development never appropriate in the greenbelt or rural locations. Location will depend on who is funding the operation. A private contractor will go where he can make a return.
- It is not for the Waste Core Strategy to attempt to alter Government policy on the green belt by stating that all waste management development is appropriate anywhere in the green belt when in accordance with the objectives of PPG2. We suggest the wording of this option should reflect the guidance in both PPG2 & PPG10 on this issue.
- The list is straight jacket and not comprehensive enough when flexibility is required.
- It is not clear at this stage whether sufficient industrial land is available within the urban area to provide the land necessary for the required facilities.
- Wish to see a Waste Core Strategy that promotes the principle of sustainability & more specifically seeks to minimise the impact of development on the Strategic Road Network (SRN). Where this is not possible, we wish to see mitigation of any such impact.

Q20 and 20A: Initial Response

These questions were a restatement of choices which have already been consulted on twice before. The purpose of this exercise was to assess if public feeling still supported those choices. It was inevitable that some respondents would disagree. In practice, however, only a minority of replies did so and of those, there was no clear rejection for any particular choice or preference for any alternative, or significant new suggestion. We will therefore:

- a) Proceed on the basis of the options we set out.

We will, however:

- b) Re-assess how we use the Council's BPEO if the consultation into the JMWMS planned for Spring 2009 raises further questions about it. We recognise that the term BPEO is no longer part of current government policy. Regardless of the concept the emphasis within the BPEO of increasing recycling and energy recovery appears to comply with emerging EU policy and may therefore still be very useful. The targets in the BPEO to reduce landfilling are in advance of those in the current LATS targets.

We will:

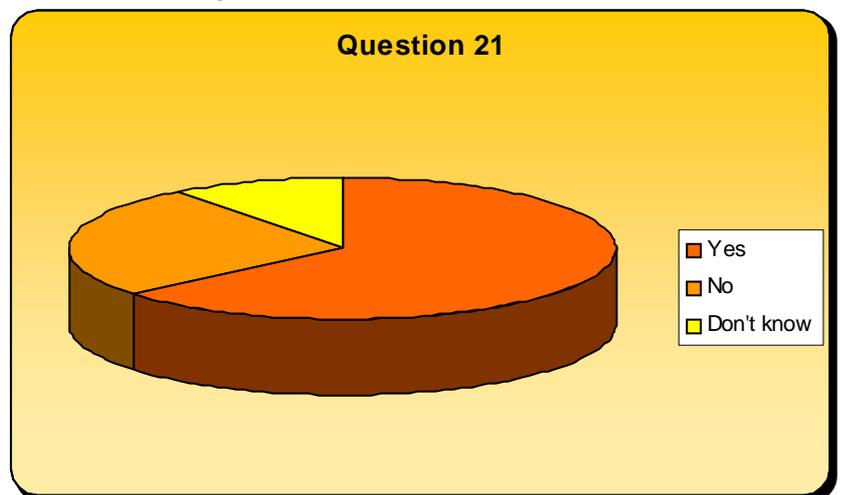
- c) Clarify the wording with regard to development in the Green Belt with GOWM.

We will nonetheless:

- d) Use these options as the principal, but not sole, way of generating alternative scenarios. We will consider developing some scenarios which do not fit these options in order to test their suitability. This will enable us to revisit some of these comments.

Question 21

Do you agree that the Waste Core Strategy should not specify which waste management technologies should be developed?



26% of the respondents gave additional comments to the issues surrounding Question 21.

a) If you think that it should specify technologies, please could you describe why, and suggest what technologies would be needed.

Additional Comments to Question 21

Comments in Support

- Technologies should not be specified as this could potentially limit the development of new technologies.
- Generally agrees with the Councils position.
- Agree, however new technologies should be on constant review.
- The Council does not need to specify which technologies should be developed.
- Yes, but it should specify least environmental impact in terms of air, noise and visual pollution.

Other Comments

- Plastic is energy but very hard to separate for recycling therefore use it as energy in small units.
- Should specify a priority list of management technologies.
- Strategy should give a breakdown of which technologies may be used and what the criteria are for selection.
- It may be desirable to identify a preferred technological solution to enable development or to test its feasibility against a range of planning criteria.
- Technologies to be part of the plan and reviewed every couple of years to identify advances.
- Developing technologies will have a wide-ranging impact over the next few years especially in the area of recycling.
- The strategy might quote typical technologies at the onset of the plan with a clear statement the developing nature of the sector and the expectation that the strategy will evolve to embrace these.
- Should run a strategic assessment of technologies; cost, effectiveness, impact, suitability, acceptability and from this make recommendations.
- Technologies should be stated and where they will be located i.e. Transfer Stations, CMRFs, Incinerators, Autoclaves etc
- For the avoidance of doubt specific technologies should be identified;
 - Their application or use (e.g. is it facility for public use, or is it treatment or disposal)
 - Their viability/deliverability (i.e. no point in saying pyrolysis or gasification are presently available when they are not.)
 - What waste stream they can manage (e.g. anaerobic digestion just treats organic food wastes)
 - Experience of their application within the UK (e.g. incineration becoming widespread and a proven, viable technology.
 - Generic locational requirements
 - Their scale and application or catchment (e.g. household waste sites are local facilities and should be developed on a single conurbation)
- Waste reduction is a waste management technique not listed.
- How about requiring commercial or industrial developments to embed waste minimisation strategies or occupiers?
- Cost effective solutions should be applied through common sense. Energy creation needs urgent consideration, we cannot afford not to.
- In new urban areas waste treatment can provide energy and district heating and should be incorporated in total planning
- More emphasis should be given to incineration, which reduces volume of waste by at least 90% and produces heat and energy. Modern systems are pollution free.

- A more focused approach on the conversion of waste to fuel is required.
- Enough information to be presented in the strategy to enable a robust sustainability appraisal of all identified broad locations and the types of facilities. For example, the different technologies outlined at page 53 could have hugely varying impacts due to the varying scale, design and height of the associated facilities. Further information is also needed on how the Council intends to group waste management activities into broad types.
- More account needs to be taken of the potential of new technologies, excluding incineration, to treat and reduce the impact of waste going to landfill.

Q21 and 21A: Initial Response

Our intention in asking these questions was to emphasize that both the role and ability of the Council and the general thrust of the government policy are to enable market flexibility in developing waste management facilities rather than to prescribe and limit the market. We also wanted to see if there was any evidence of or ideas which would enable alternative approaches. We intend to proceed on the general basis that we should not specify technologies. We will, however:

- a) Produce a report for consultation on “Types of Facilities”, setting out the principal types of waste management technologies which currently exist and the issues which need to be considered in developing them.
- b) Work with the expectation that the Strategy will make these possible subject to an assessment of some of the issues respondents suggested.

This would enable us to:

- c) Identify areas or locations or the locational requirements where certain kinds of technology could be developed.
- d) This could include, but will not prescribe, an assessment of some of the waste streams they might address.

We note several correspondents’ comments about incineration and energy generation, but we do not want to specify technologies at this stage.

Question 22

We think the following concepts could be used to distinguish the locations in which waste management facilities should be developed.

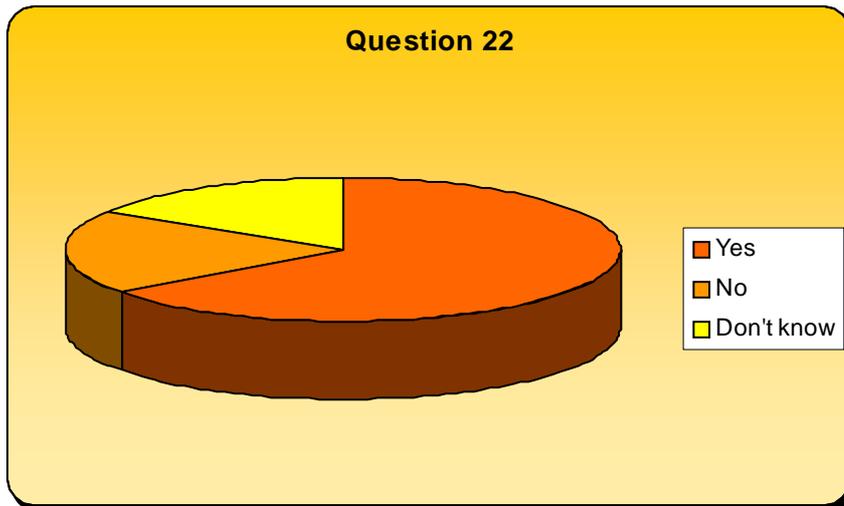
Facilities where the primary waste management activity would be

- a) **outdoors.**

- b) windrow composting, or
- c) landfill, or
- d) Indoors, or
- e) Indoors but where emissions would be dispersed significantly beyond the site.

We will use these to develop a range of criteria to identify what kind of sites would be appropriate for each concept.

Do you agree this would be a useful way to proceed?



a) If not, please could you explain why and suggest alternatives.

18% of the respondents gave additional comments to the issues surrounding Question 22.

Additional Comments to Question 22

Comments in Support

- Supports the general approach but the example in the question are not particularly helpful and is recommended that the approach suggested in question 21a is adopted.

Other Comments

- More emphasis on reducing the production of waste, more reward for taking responsibility of own waste e.g. charging for plastic bags, financial reward for using renewable bottles.
- Location should be based on least risk and nuisance to fewest people, and efficiency of

the site location.

- Important factors to consider are volume, road miles and energy gain.
- Identify and monitor sites against Regional Plan.
- Fundamental criteria must be defined first and then additional optional preferred criteria must be added for each type of waste management process/method.

- Make landfill a last resort and that 'indoors' should have no desirable emissions. Where does recycling fit into this?
- Each waste management process/method will have its own facility specification.
- Location of waste generation, the demand for recycle and products such as electricity heat & fuel should be given high priority when considering location along co location with other waste technologies. This is in order to maximise treatment options.
- Our primary concern here is that enough information is presented in the strategy to enable a robust sustainability appraisal of all identified broad locations and the types of facilities. For example, the different technologies outlined at page 53 could have hugely varying impacts due to the varying scale, design and height of the associated facilities. Further information is also needed on how the Council intends to group waste management activities into broad types.

Q22 and 22A: Initial Responses

Our intention in framing this question was to see if it was possible to group waste management activities into broad categories and to develop criteria to see if we could identify sites or areas which would be appropriate for each category.

In response to the comments received, we will:

- a) Note the potential importance of waste minimisation as a technique.
- b) Consider making risk and nuisance to the fewest people, co-location of facilities and transport considerations issues we use in developing this concept.
- c) Explore scenarios where the emphasis is on different kinds of options.

Question 23

**Finally, are there any other matters you think we should address?
Please give as much detail as possible.**

Question 23 gave respondents the chance to make additional comments to the Refreshed Issues and Options Report. Comments listed below were not all made under Question 23, respondents that did not complete a questionnaire but made comments by e-mail, letter or fax.

30% of the respondents answered Question 23, having additional comments to make to the Refreshed Issues and Options Report.

In Support

- The document is excellent and reflects substantial work on the subject.
- The previous submission draft Waste Core Strategy was supported.
- The document is in general conformity with the existing RSS and emerging Phase 2 revision but certain matters need further explanation and clarification (Policies W2, W3, W5, W6, W7, W9, W10 and W12).
- Agree, (Page 15/16) include Woodland and Green Wood Waste Forestry.

Other Comments

Recycling & Re-use

- Partnership with waste companies to ensure income from recycled minerals return to the county. Perhaps waste companies paying to take our waste?
- Consideration should be given to recycling batteries and ink cartridges.
- Need to think 'outside the box' for planning to meet needs. Why is recyclable waste refused at domestic transfer sites? Why is there no commercial recycling scheme? Why are there no incentives for recycling & re-use?
- Look at underground waste/recycling collection systems and Envac systems.
- Look at communal waste/recycling collection sites in villages as in France.
- Make it easier for everyone to recycle.
- Transfer stations will be vital to increase the recycling potential in this area.
- Utilise third party waste contractors to assist in recycling.
- Companies have issues whereby they cannot recycle some of the hazardous waste produced.
- No reference is made in the report on the disposal of the products of recycling.

Reducing Waste

- Emphasis on composting is given but where is the market for the product.
- Waste minimisation rather than waste disposal must be Worcestershire's top priority.
- Stopping waste before it becomes a waste. Be more proactive in reducing waste.
- Encourage people to grow their own food = reduction of packaging.
- Issues are when waste becomes a product.
- Look at Countywide or West Midland City Region wide bin colours, logo (WRAP logos), bin type and waste/recycling systems
- Education/ help is needed to reduce waste production. Educate Sees to recycle more.
- Targets in the report are irrelevant, only nil should be used. Nil waste to be produced and if not possible then nil into landfill.
- The strategy does not put pressure on manufacturers/ distributors to reduce the amount of packaging used.
- Zero waste should be the main objective.

Transporting waste

- The River Severn could be used to transport waste to a joint incinerator with Telford, Staffordshire, Shropshire and Worcestershire.
- There is sound economic case (and environmental and social case) for considering freight by water as a viable alternative to road transport; have beneficial effect on wildlife.
- Assist in retaining water in pre-drought conditions.
- Approx. £2.5m of renewable electricity can be produced from low head hydro schemes from Stourport to Ironbridge.
- Powerdays, a waste handling company due to launch a new inter-modal vehicle which will improve the transfer of waste from road to barge.
- Focus on construction materials and waste where source and destination is adjacent to the canal.
- The strategy should consider the benefits of allocating waste management facilities on inland waterways. Whilst taking care to balance the sustainable transport benefits against safeguarding the amenity value and public access to the waterways for tourism and recreation.
- Two rivers, the Severn & Avon both capable of moving bulk waste in an environmentally friendly way, serve County.
- Proposed policy on p33 should be more clearly written to specifically include sustainable transport.

Waste Management

- Incineration does not provide an acceptable or long term solution to problems.
- Anaerobic digestion to produce biogas, which is a potential energy source.
- Energy should be recovered from wastes where possible is disputed and contentious.
- More consideration should be given in turning our waste into energy saving form of heating.
- Biogester? As per Gloucestershire.
- Mechanical waste sorting.

- Urge state of the art containment and collection systems to become part of the plan.
- Hazardous Waste Sites; there is no explanation why a plant providing for 50,000 tonnes+ is not viable in the County, needs to be clarified.
- A reliance on the sale of these products for financial viability of schemes would be illusionary. Incineration is independent of the vagaries of the market.
- Will rag and bone collectors be included in the strategy; will their locations be part of the picture?
- Partnerships with the local water company = co-treatment of certain solid wastes with sewage sludge. Base facilities producing liquid near to or within sewage treatment facilities.
- The local provision for resource centres etc for use by all kinds of businesses needs to be considered somewhere. Local reuse of local waste is the most sustainable.
- Collections for green waste.
- Hazardous waste should not be mixed but segregated. Management of clinical waste is a specific issue; can contain pathogenic and chemical hazards. You may wish to consult NHS Trusts for the County.
- Rewards for scrap items dismantled or returned correctly.
- Authority should provide small commercial vehicles to use household waste sites free of charge.

Alternatives to landfill

- Consider energy from waste initiatives as this could provide a route for material that could not be landfilled.
- Landfill appears to be the only current cost effective solution to asbestos related matters. The only alternative for asbestos would be storage within a solid matrix as they do with nuclear material (glass) or high temperature processing to change the structure of the naturally occurring mineral.
- The amount of asbestos requiring removal is likely to rise steadily and cannot just be stemmed by stating that quantities sent to landfill must be reduced.
- Little reference is made in the strategy report of incineration, which has the added benefit of reducing the volume by 90% with consequent saving on landfill.

Location of waste facilities

- Recognise the green belt.
- There is a limited amount of previously developed land available within Redditch.
- Hartlebury has endured its fair share of waste disposal (3 landfills in a small rural parish) and it should be recorded that the Hartlebury residents have 'done their bit' and the County needs to look elsewhere for waste management.
- Two sites in Worcestershire, Waresley and Hartlebury have ongoing landfill activity and have no land to offer towards the strategy.
- Concern over the 'wrong' types of waste facility potentially being detrimental to the regeneration focus of Kidderminster.
- It would appear sensible for Malvern to be included before the towns of Bewdley & Evesham, which are much smaller settlements in comparison,

& therefore should not be creating as much waste. Furthermore, in order to conform to the proximity principle, it is felt that Tenbury should be included in the first list of settlements (in view of its remote location within the County).

- Many of the canals are important wildlife, recreation & heritage corridors which will require protection & therefore any proposals must take full account of this. The Staffordshire & Worcestershire Canal will also be a major focus for regeneration in Kidderminster town centre.
- Maybe useful to highlight Central Technology Belt on Map 3 in appendices, which currently highlights existing major industrial areas#
- Locational guidance can be informed by very basic evaluation of principle areas of population, major constraints (e.g. Green Belt) & major transportation routes (i.e. refer to Spatial Portrait).
- Strategy needs to clearly identify that various types of waste management facilities & processes will have different requirements/ locational criteria. For instance, the criteria for siting new household waste sites are quite different from those for siting say windrow composting or IVC or EfW. We believe the Council should not make broad statements in the Spatial Portrait (or anywhere else) about locational issues or constraints without identifying the types of facilities (and waste types) to be managed, & setting out locational criteria tailored to each type of facility/process. 'What we need to consider' could be simplified:
 - a) The geography of Worcestershire, & how it may change over time (demographics) – i.e. the content of the Draft Spatial Portrait.
 - b) Types & quantities of waste expected (assuming growth but no change in the composition unless informed by the geography).
 - c) Targets & policy objectives.
 - d) Broad types & number of facilities required
 - e) Discrete locational criteria for each type of facility.
 - f) Provisions for managing change i.e. the impacts of changing waste volumes & composition.
- Our main concern is whether your treatment of spatial options will ultimately be adequate to allow you to demonstrate the strategy is sound.

Reference to Planning Policy

- Little reference to England Waste Strategy, the overturning of the waste hierarchy and decoupling waste from the economy.
- Emerging core strategies, we would expect to see this relationship brought out more clearly as the Waste Core Strategy is developed.
- One of your options is to include the approach through the incorporation of the adopted BPEO strategy into the Waste Core Strategy. You will need to clearly justify its inclusion & demonstrate what it brings to the strategy, if it is to be found sound.
- We disagree that the Joint Municipal Waste Strategy is the appropriate document in which to address the spatial planning of municipal waste facilities.
- BPEO references (page 12) need to be played down as the JMWMS is under review & thus needs to be monitored as to whether the BPEO will still form a component of the 'assessment' of Reviewed Strategy.

- For a purpose of clarity it is suggested that clearer distinction be made between the current & emerging RSS when referring to these strategies.
- How does the strategy fit in with the JMWMS with Herefordshire?
- ISO14001 suggest that the County Council encourage other organisations to follow this path.
- How will the Council ensure they comply with our own procedures, policies and guidance? Planning services at each Council helping instead of hindering the process.
- The document does not make clear how a number of proposed policies set out in the WMRSS Phase 2 Revision. Preferred Option (December 2007) have been addressed. These are W2, W3, W5, W6, W7, W9, W10, and W12. Further explanation and clarification is required.
- Little mention of cross boundary transfer from Warwickshire into Worcestershire, this was an issue picked up by GOWM with regards to Warwickshire's Core Strategy.

Targets

- The BPEO targets have been superseded at national & regional level & are inconsistent with the newer targets. Other relevant policy drivers have come into play; Energy White Paper & Draft Renewable Energy Strategy, which must give rise to questioning some of the BPEO assumptions e.g. it would be difficult to justify landfilling 23% of C&I waste & only recovering energy from 4%. Landfilling is further down the hierarchy & there are new energy generation imperatives.
- Makes reference to too many targets. It should rationalise & focus on one set of objectives, which are mandatory, realistic & achievable.

General Comments

- Need individual breakdown of waste type and quantities for each collection area should be used.
- PFI should be withdrawn.
- The production of waste should be the responsibility of the producer.
- Most C&I waste will come from returns for materials delivered to the permitted waste management sites. Waste producers are not required send out data to specific bodies regarding C&I waste.
- Incentives for solar power, wind turbines, rain water harvesting and micro sewage plants.
- Laws to make packaging biodegradable.
- Approach to fly tipping should be changed.
- Cost of dealing with small rubbish loads is legitimately too high, is this why fly tippers risk apprehend and a hefty fine?
- Strategy needs to be wide-ranging view and good communication to make it work.
- Include existing site contamination.
- If the point public/business interact with waste industry isn't correct then it won't get what you need to feed treatment plants.
- Look at strategies to sell this to the public.
- How we will achieve best value for money?
- Industry waste is double the domestic waste so double the effort should be applied to industrial waste rather than domestic.

- Address carbon footprint of further developments and make this a critical requirement that it is minimised and is negative before allowing any development to proceed.
- Adopt an open honest approach to the community.
- Different types of waste require different sets of rules.
- Economic downturn should provide opportunities at reduced cost.
- Scrap cars? Anything included about them?
- Address issues of compensation and reward for loss of amenity.
- It would be helpful if Worcestershire could identify how much contaminated soils emanate from the county and are treated in the county and elsewhere.
- The scenarios need to be more than simply apportioning waste management to the Districts. It may be more appropriate, for example, for facilities to be provided to serve a number of settlements irrespective of local authority boundaries. There will also be need for flexibility in the approaches in order to take into account changing circumstances.
- Need to show how the strategy will be delivered & by whom. We would expect to see, therefore, the establishment of an implementation & monitoring framework as the Core Strategy is progressed.
- Text at foot of page 21. We suggest that a better synopsis of the 'key issues' is: *We all produce waste & its production has environmental consequences. We must reduce the amount of waste we produce & ensure the environmental costs of its management are minimised. This will require us plan positively & effectively; and where practicable & sustainable, use that waste which we continue to produce as a resource.*

Q23 and 23A: Initial Response

This question raised a very large number of responses.

Some of these are relatively easy to address. We will:

- a) Encourage waste minimisation through the Council's economic development arm.
- b) Explore the co-location of new waste management facilities and water treatment systems.
- c) Explore the provision of facilities as close as possible to areas of waste generation.
- d) Clarify references to the current and emerging RSS.
- e) Consult on the possibility and desirability of using waterways for the transportation of waste.
- f) Clarify links with the JMWMS and Herefordshire.
- g) Look at research into SME's special needs.

- h) Revise the Vision for the WCS.
- i) Consult on the role and need for more Waste Transfer Stations.
- j) Research the existence and role of rag and bone men.
- k) Explore the extent of hazardous wastes in the County (e.g. asbestos) and the need for further facilities.
- l) Refer the (very many) references to Municipal Waste Issues in this section and in the report generally to the Council's waste management section.
- m) Promote information and education about waste minimisation.
- n) Take account of references to specific towns, places or areas when developing alternative scenarios.
- o) Reconsider references to the BPEO.
- p) Ensure conformity to and the implementation of the RSS.
- q) Reassess the targets we will address, including national, regional and the possibility of zero waste targets.
- r) Undertake further research into the volumes of waste being produced in the county.
- s) Consult on the nature of clinical waste produced in the County and the need for special provision for it.
- t) Further explore and produce a report on cross boundary issues.
- u) Note the concerns expressed both for and against energy from waste issues and maintain our current stance of not favouring any specific technology.
- v) Revise the Spatial Portrait.
- w) Explore implementation issues further.

Many of the other points made were also made in response to specific questions and are addressed above under particular questions.

x) We will nonetheless check the alternatives we develop against the remainder to see if and how they can be addressed as the Strategy is finalised.

Acronyms

- **AONB** Area Of Natural Beauty
- **BPEO** Best Practical Environmental Option
- **C & D** Construction & Demolition
- **C& I** Commercial & Industrial
- **CHP** Combined Heat and Power
- **CMRF** Commingled Materials Reclamation Facility
- **DBERR** Department for Business Enterprise and Regulatory Reform
- **DEFRA** Department for Environment Food and Rural Affairs
- **DfT** Department for Transport
- **DPD** Development Plan Documents
- **dRSS** Draft Regional Spatial Strategy
- **EEC** European Economic Community
- **EfW** Energy from Waste
- **GOWM** Government Office for the West Midlands
- **HGV** Heavy Goods Vehicle
- **JMWMS** Joint Municipal Waste Management Strategy
- **LDD** Local Development Documents
- **LDF** Local Development Framework
- **LGV** Light Goods Vehicle
- **LPA** Local Planning Authority
- **LTP** Local Transport Plan
- **MSW** Municipal Solid Waste

- **PFI** Private Financial Initiative
- **PPS** Planning Policy Statement
- **RSS** Regional Spatial Strategy
- **SA** Sustainability Appraisal
- **SFRA** Strategic Flood Risk Assessment
- **SME** Small & Medium Enterprises
- **SWJCS** South Worcestershire Joint Core Strategy
- **WCS** Waste Core Strategy