Summary of Responses to Regulation 30 Consultation on Refreshed Issues and Options Report

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. We are currently in the first stages of re-commencing work on the Waste Core Strategy as part of which we produced and consulted on a “Refreshed Issues and Options Consultation “How should we proceed?” between September 29th and December 19th 2008.

This document provides a summary of the responses made to the Refreshed Issues and Options Report Consultation. It`s purpose is primarily to set out who said what in the consultation and only to make the simplest of comments on what was said. The column marked Worcestershire County Council comments represents officer comments at the current time not the comments of Council Members and are not therefore definitive. Comments marked; *noted* will be explored further in the process when looking at alternative scenarios.
We have also produced a “Summary of Consultation Responses and how we intend to address them “ report, which analyses and summarises the responses we received by question and sets out in much more detail how we will address them, again, it must be emphasised that these are also officer comments and must not be interpreted as representing the views of the Council`s elected Members, either individually or collectively. All of these reports can be found on the Council`s website at www.worcestershire.gov.uk/wcs

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Summary of Responses to Regulation 30 Consultation on Refreshed Issues and Options Report.

Please note that this is a summary of comments received. For details of full comments please contact the Planning Department at Worcestershire County Council.

Response Reference Number	Consultation Number	Date Received	Name	Job Title/Organisation	Address	Summary of Points Made	Response Acknowledged?	Council's Initial Response
0001.		26/09/08	Charles Kenchington	Severn Navigation Restoration Trust (Director) and Upper Severn Hydro and Navigation Company Ltd	The Old Rectory, Hope Bagot, Ludlow, Shropshire, WY8 3AF	• **Responded by e-mail** • Waste and minerals should be moved by water wherever possible • Council should access SNRT and USHNC websites to discover what they are trying to achieve • The river Severn is the single most under-utilised capital asset in the county. • Each county having its own policy does not augur well for solving national energy, emissions and waste problems. • The River Severn could be used to transport waste to a joint incinerator with Telford, Staffordshire, Shropshire and Worcestershire. • The River could be used to transport aggregates. • Deeper summer water, supplied by variable weirs that are neutral in flood conditions, would have a beneficial effect on wildlife. Variable impounding could assist in retaining water in pre-drought order conditions. • Approx. £2.5m of renewable electricity can be produced from 5 low head hydro schemes from Stourport to Ironbridge. A partnership with Severn Trent Water and South Staffs Water in connection with their installations alongside the river is a possibility. • Use the river to reduce visitor car journeys. • The possible use of the Severn for transportation should be highlighted as a separate infrastructure issue for forward planning.	29.09.08	Agreed. The Council is preparing a specific note on this issue. Noted. Noted. Noted, but this government policy. Noted. Agreed. Noted, Natural England's and Environment Agency advice needed. Noted. Agreed Noted.
0002.		03/10/08	Mrs M Diss	Parish Clerk, Redmarley D'Abitot Parish Council	3 Little Green, Redmarley, Gloucestershire, GL19 3LQ	• As only a very small part of Redmarley falls under the Malvern Hills AONB in Worcestershire the Council does not feel any comments from them would have relevance.	06/10/08	Noted.

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0003.		06/10/08	Katherine Burnett	Planner – West Midlands, British Waterways	Peel's Wharf, Lichfield Street, Fazeley, Tamworth, Staffordshire, B78 3QZ	• Q1 – Yes: • Q1AMaterials from the dredging of canals could be reprocessed to produce recycled aggregates for developments. • Q2 – No comment • Q3 – No • Q3A - Mineral operators with mineral sites adjacent to waterways should be encouraged to accept/accommodate the disposal of materials from the dredging of canals to reprocess to sell on as aggregates. • Q4 – Don't know: The refreshed issues and options report on page 24 states "we have set out a draft spatial portrait in question 4" but unable to find any other reference therefore British Waterways unable to comment. • Q5 – Yes • Q5A - BW welcomes this reference to use of water to transport materials. The canal navigation can provide a freight route for the transit/movement of waste materials to reduce vehicle movements by road, improving air quality etc. • Q6 – Yes • Q7 – No comment • Q8 – Yes • Q9 – Yes • Q9A - Monitor the use of materials from the dredging of canals by liaising with BW • Q10 – Yes • Q 11 – Yes • Q 12 – Monitor the use of materials from the dredging of canals by liaising with BW • Q 13 – Yes • Q 14 – Yes	06/10/08	Agreed. Agreed. Noted. Agreed. The Council is developing a paper on waterway related issues. Noted. Noted.

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						• Q 15 – Don't know • Q 16 – Yes • Q 16 A – Yes • Q 17 – Yes • Q 18 – Yes • Q18A - Protection of the canal corridor environment including biodiversity, water quality etc. • Q 19 – Yes • Q19A - BW have no suggestions to make at this time. • Q 20 – Don't know • Q20A - BW prefers options which would encourage the use, improvement and safeguarding of the canal corridor. • Q 21 – Yes • Q 22 – Don't know: Waste management facilities could include the utilisation of infrastructure at mineral workings adjacent to canals to reprocess dredging from canals which could be facilities for the primary waste management of these materials could take place. • Q 23 – No Comment.		Noted. Noted.
0004.	499 – C	06.10.08		MHF (UK) Ltd	The Nathan, Radford, Inkberrow, Nr Worcester, Worcestershire, WR7 4LN	• Questions 1 – 23 all ticked "don't know" & no further information given.		Noted.

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0005.	1445 – W	08.10.08	Mrs Jo Walker	Local resident, member of the J-7 Waste Action Group	15 Lobelia Close, Worcester, WR5 3RR	• **Responded by letter** • Visited County Hall to view the Sustainability Appraisal and could understand very little. • As an ordinary householder, joined the J-7 Waste Action group, attended the Planning and Regulatory Committee Meeting in June 2007 and was (still is) aghast at the choice of site and that the plans were carried. • Appreciates that a waste recycling plant is desirable and necessary and understands that WCC has withdrawn the earlier core strategy and issued this Refreshed Issues and Options Report; however, feels she is getting out of her depth – **jargon is confusing** and would be a mockery for her to complete the questionnaire. • Request to be removed from the database.		Noted.
0006.		10.10.08	Helen Milner	Town Planner, Network Rail	Floor 1, Square One, 4 Travis St, Manchester, M1 2NY	• No initial comments to make but will need to be consulted on future planning applications for such issues as their impact on railway network.	13.10.08	Noted.
0007.	796 – L	13.10.08	Bob Harris	Friends of the Earth (Wyre Forest)	59 St John's Avenue, Kidderminster, Worcestershire	• Q1 – No • Q2 – Yes • Q3 – Yes • Q4 – Yes • Q5 – Yes • Q6 – Yes • Q7 – Yes • Q8 – Yes • Q9 – No • Q10 – Yes • Q11 – Yes • Q12 – No comment • Q13 – No • Q13A - What evidence exists to show that the EA's records are accurate?	13.10.08	Noted.

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						• Q14 – No comment • Q15 – Don't know • Q16 – Yes • Q16A – Yes • Q17 – Yes • Q18 • Q18A - If you research to the minimisation of waste there is a multitude of issues that you will need to pursue. • Q19 – Don't know • Q20 – Yes • Q21 – Yes • Q22 – Don't know • Q23 – No comment		Noted.
0008.	186-C	10.10.08	Mr Andrew Swann	Quality Manager, Pre-Met Ltd	Studley Road, Redditch, B98 7HJ	• Q1 – No • Q2 – Yes • Q3 – Yes • Q4 – No comment • Q5 – No comment • Q6 – Yes • Q7 – Yes • Q8 – Yes • Q9 – No • Q10 – Yes • Q11 – No • Q11A – Redditch is 17.7% adequate for industry in this area. • Q12 – No comment • Q13 – No • Q13A – Suggest using an audit method be applied to residential and industrial waste. • Q14 – Yes	22.10.08	This reflects the draft RSS policy. Noted.

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						• Q15 – Don't know • Q16 – Yes • Q16A – No: 1, 3 and 5 Years • Q17 – Yes • Q18 – No comment • Q19 – No comment • Q20 – Yes • Q21 – Yes • Q22 – Yes • Q23 – No comment		Noted.
0009.	1212-Y(S)	10.10.08	Mr M Moody	Parish Clerk, Quinton Parish Council	Stour View, Alderminster, Stratford upon Avon, Warks	• Q1 – No • Q2 – Yes • Q3 – Don't know • Q4 – Yes • Q5 – Don't know • Q6 – Yes • Q7 – Yes • Q8 – Yes • Q9 – No • Q10 – Yes • Q11 – Yes • Q12 – No comment • Q13 – Yes • Q14 – Yes • Q15 – Yes • Q16 – Yes • Q16A – Yes • Q17 – Yes • Q18 - No • Q19 – Don't know	22.10.08	Noted

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						• Q20 – Yes • Q21 – Yes • Q22 – Yes		
						• Q23 – No comment		
0010.	480-C	10.10.08	Treble R Fabrications	Treble R Fabrications	Unit 42, Park farm Industrial Estate, Crossgate Road, Redditch, Worcs, B98 7SN	• Q1 – No • Q2 – Yes • Q3 – Yes • Q4 – Yes • Q5 – Yes • Q6 – Yes • Q7 – Yes • Q8 – Yes • Q9 – No • Q10 – Yes • Q11 – Yes • Q12 – No comment • Q13 – Yes • Q14 – Yes • Q15 – Don't know • Q16 – Yes • Q16A – Yes • Q17 – Yes • Q18 - No • Q19 – Yes • Q20 – Yes • Q21 – Yes • Q22 – Yes • Q23 – No comment	22.10.08	Noted.

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0011.	465-C	10.10.08	Mr Steve Clarke	General Manager, Estech Europe Ltd	Beecham Business Park, Northgate, Aldridge, West Midlands, WS9 8TZ	• Q1 – No • Q2 – Yes • Q3 – Yes • Q4 – Yes • Q5 – Yes • Q5A - Include in the vision that the Council will actively look to develop uses for the waste materials to help stimulate its use as a source of useful material. • Q6 – Yes • Q7 – Yes • Q8 – Yes • Q9 - Yes • Q9A - Monitor how much of the waste is reused or recycled compared to waste going to landfill. This can be monitored via weighbridge tickets and duty care notes. • Q10 – No • Q10A - To obtain best value it is likely that you will have to go for larger plants that can process more efficiently. • Q11 – No • Q11A - There are different types of waste within this category. It would be more beneficial to accumulate the different types of waste and process them in larger plants located centrally to obtain best value for money. • Q12 – Waste should be monitored if it is going to landfill to see if there are any alternatives to enable it to be reused or recycled. • Q13 – Yes • Q14 – Yes • Q15 – Yes • Q16 – Yes	22.10.08	Noted and will be pursued in the JMWMS. Noted. Agreed. Noted. Noted.

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						• Q16A – Yes • Q17 – Yes • Q18 – Yes • Q18A - The type of waste treatment facility. • Q19 – Yes • Q19A – Changes to the amount and type of waste generated e.g. Is the amount of waste per household increasing or decreasing? Is food packaging becoming more recyclable? • Q20 – Yes • Q21 – No • Q22 – Yes • Q23 – Worcestershire County Council and all Councils are in a unique position. By including recycled products in its range of purchases it could help to stimulate demand and make recycling cheaper.		Agreed/ Noted. Noted.
0012.	1474-W	10.10.08	Mr David Wilson		Lavender Cottage, Woodbury Lane, Norton, Worcester, WR5 2PT	• Q1 – Yes: Requested more information on the subject of waste streams. • Q2 – No • Q2A – The role of the Council, Local and Central Government should be to help and assist private and commercial residents to "do the right" thing for the majority. Instead, it seems that Councils, Local and Central Government are only interested in serving their own best interests. Mr Wilson suggests we ask for examples. • Q3 – No • Q3A – As answer to question 2A • Q4 – No	22.10.08	Noted.

Response Reference Number	Consultation Number	Date Received	Name	Job Title/Organisation	Address	Summary of Points Made	Response Acknowledged?	Council's Initial Response
						• Q4A – Ignores problems caused by traffic travelling to & 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 or making waste a commercial asset. • Q5 – Yes • Q5A –Include that waste plants should only be located in industrial areas. Any domestic residencies affected by waste plants should be financially compensated. Also include an emphasis on the generation of wealth, jobs and energy for the local areas served by the waste plants. • Q6 – Yes • Q7 – No • Q7A – We should all be made aware and personally responsible for all types of waste that we personally generate. • Q8 – No • Q8A – Exceeding targets should be encouraged. If targets can be exceeded because waste products are being used for energy production that is efficient, or any other commercially viable product it would set an example. • Q9 – Yes • Q9A – Measure the cost of new products/ packaging etc against recyclable products/ packaging. Financial rewards to be obvious for recycling. • Q10 – Yes		Noted. Noted. Noted. Noted. Noted. Agreed. Noted. Noted.

Response Reference Number	Consultation Number	Date Received	Name	Job Title/Organisation	Address	Summary of Points Made	Response Acknowledged?	Council's Initial Response
						• Q10A – If every community dealt with it's own energy, water, sewage, food, schooling etc. it would become more obvious and apparent to many disillusioned voters how much we need to take personal responsibility for. All Councils, Boroughs, Local and Central Government must be accountable too. • Q11 – Don't know • Q12 – Monitor the financial benefits of a community being accountable & aware of its responsibility. • Q13 – No • Q13A – Potential Capacity should be the aim. • Q14 – Don't know • Q15 – No • Q15A – Can the possibility of energy product/ production be pursued? • Q16 – Yes • Q16A – Monitored monthly; reviewed annually. • Q17 – No • Q17A – More emphasis by all Governments on the cutting down/ ceasing of waste products. Any still created should be able to be regenerated as energy sources or renewable products. The solution should be less waste products therefore less waste product sites are needed. • Q18 – Yes • Q18A – Micro Economies should be created by Central Government. These micro economies should be explained to the commercial and domestic residents – how each person has a responsibility to the "whole picture". Good deeds should be rewarded. Bad deeds should be punished.		Agreed. Noted. Noted. Noted but monthly monitoring is not possible. Noted. Noted.

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						• Q19 – Yes • Q19A – 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. • Q20 – No • Q20A – People should be made aware of their personal responsibility and impact. Reward given for making positive decisions would ensure that people 1) make the right decision 2) are punished for making the wrong decision. • Q21 – Yes, No, Don't know - Everything should be considered. • Q22 – No Q22A – More emphasis on stopping waste before it becomes waste, more reward for taking personal responsibility of own waste. Example: 10 pence on renewable bottles, charging customers for plastic bags etc. • Q23 – ○ Stopping waste before it becomes waste. ○ People encouraged to grow own food cuts down on packaging ○ Rewards for scrap items dismantled or returned correctly. ○ Incentives for solar power, wind turbines, rain water harvesting and micro sewage plants. ○ Planning services at each Council helping instead of hindering the process.		Noted. Noted. Noted. Noted. Noted. Agreed. Agreed. Agreed. Noted. Noted

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0013.	1271-W	13.10.08	Ken Merry		16 Whinchat Grove, Kidderminster, Worcs, DY10 4TJ	• Q1 – No • Q2 – Yes • Q3 – Yes • Q4 – No • Q4A – 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. Does not list any returns made from composting, mineral re-use and energy production. • Why landfill if it produces more CO2? • If we use waste to produce energy, show a plus or minus for what is being done. • Q5 – Don't know • Q5A – o "Produce" is not the correct word for what causes waste. Waste is a leftover an effect of globalisation, packaging made by manufacturers to protect their product needs regulating first before the vision can state that 'very little' waste will be produced as it is unattainable otherwise. o It may be better to say no waste will be placed in landfill and the reduction of CO2 & reusable energy will be maximised. Not sure if the no landfill option is attainable. o Revisit incineration option, which will lead onto hazardous waste & pre-treatment before landfill. o Not convinced landfill is such a bad option as voids in the ground will need filling after mineral extraction. o Options for automatic sorting of waste?	22.10.08	Noted. The Council is exploring carbon management issues in its Climate Change Strategy. At present government advice is that some provision for landfill should be made. Noted. See above Q4A. Noted. See above. Noted.

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						○ Minimise the impact on the lowest number of people possible in whatever we do. o Better to say by 2027 all waste will be recycled in the most cost & energy efficient manner.Q6 – Yes: But 'produce' is not the correct word for the cause of waste. • Q7 – Yes • Q8 – Yes • Q9 – Don't know: Diesel vehicles and what are CO2 emissions per mile/km? How much electricity is used? • Q10 – Don't know: If it is the most CO2 efficient way. If not centralised units may be beneficial. • Stop cars transporting waste to depots • Q11 – Don't know • Q11A – Presumably based on estimates & re-evaluated as the plan goes forward. • Q12 – No comment • Q13 – Yes • Q14 – Yes • Q15 – Yes • Q16 – Yes • Q16A – No – Review every 3 years. You cannot project accurately for 5 years. • Q17 – No – As for question 16A. • Q18 – Don't know • Q19 – Yes • Q20 – Yes • Q21 – Yes • Q22 – No • Q22A - Location should be based on least risk & nuisance to fewest people, & efficiency of site/location.		Noted Noted. See above re Q4A. Noted. Noted. Noted. Noted. Noted.

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						• Q23 – ○ Mechanical waste sorting. ○ Partnership with waste companies to ensure income from recycled minerals return to the county. Perhaps waste companies paying to take our waste? ○ Collections for green waste. ○ Laws to make packaging biodegradable.		Noted. Noted. This will be explored in the JMWMS. This is outside the remit of the WCS.
0014.	639-E(S)	13.10.08	Mr S Clee	Parish Clerk/ Rock Parish Council	Three Gables, Hop Pole Lane, Bewdley, Worcs, DY12 2QH	• Q1 – No • Q2 – Yes • Q3 – Yes • Q4 – Yes • Q5 – Yes • Q6 – Yes • Q7 – Yes • Q8 – Yes • Q9 – No • Q10 – Yes • Q11 – Yes • Q12 – No comment • Q13 – Yes • Q14 – Yes • Q15 – Yes • Q16 – Yes • Q16A – Yes • Q17 – Yes • Q18 - No • Q19 – Yes • Q20 – Yes • Q21 – Yes	22.10.08	Noted

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						• Q22 – Yes • Q23 – Consideration should be given to recycling batteries and ink cartridges in the Waste Core Strategy.		Noted.
0015.	555-E(S)	14.10.08	Mr Bernard Pound			• Q1 – No • Q2 – Yes • Q3 – Yes • Q4 – Yes • Q5 – Yes • Q5A - Comments concerning the inevitable liquid effluents from waste treatment facilities. These must be addressed as carefully as the initial wastes, and not just left to the water companies to cope with • .Q6 – Yes • Q7 – Yes • Q8 – Yes • Q9 – Yes • Q9A - Carbon Dioxide and other Greenhouse gas emissions. Carbon footprint of the individual facilities, including transport biological load of liquid effluents. • Q10 – Yes • Q11 – Yes • Q12 – No comment • Q13 – Yes: But also include information from Severn Trent Water on effluents from industrial waste treatment plants. • Q14 – Yes • Q15 – Yes • Q16 – Yes • Q16A – Yes • Q17 – Yes • Q18 – Yes • Q18A - Potential noise pollution from waste management sites. Noxious gas production from site ('smells')	22.10.08	Agreed. The Council is exploring the assessment of Carbon Footprints in its Climate Change Strategy. Noted. STW are one of the Council's statutory specific consultation bodies. Agreed.

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						• Q19 – Yes • Q20 – Yes • Q21 – Yes • Q22 – No comment • Q23 – Partnerships with the local water company have potential in terms of co-treatment of certain solid wastes with sewage sludge. Similarly, basing of facilities that produce liquid effluent near to or within sewage treatment facilities would make a lot of sense.		Agreed.
0016.		20.10.08	Mr Barry Ward	Profin Protective Finishing Ltd	Unit 33, Crossgate Road, Park Farm Industrial Estate, Redditch, Worcs, B98 7SN	• Q1 – No • Q2 – Yes • Q3 – Yes • Q4 – Yes • Q5 – Yes • Q6 – Yes • Q7 – Yes • Q8 – Yes • Q9 – Don't know • Q10 – Yes • Q11 – Yes • Q12 – No comment • Q13 – Yes • Q14 – Yes • Q15 – Yes • Q16 – Yes • Q16A – Yes • Q17 – Yes • Q18 - No • Q19 – Yes • Q20 – Yes • Q21 – Yes • Q22 – Yes • Q23 – No comment	22.10.08	Noted

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0017.	844-L	20.10.08	Mr D Way	Vale of Evesham Civic Society	Rodesmere Greenhill Park Road Evesham Worcs WR11 4NL	• Q1 – No • Q2 – Yes • Q3 – Yes • Q4 – Yes • Q5 – Yes • Q5A – To constrain the vision to Worcestershire is understandable but the county is a consequence of historical development and there may be benefits for some waste areas to be optimised by extending the area to include parts of Gloucestershire and Warwickshire in our future plans – cross border buying and selling for our mutual benefit • Q6 – Yes • Q7 – Yes • Q8 – Yes • Q9 – No • Q10 – Yes • Q11 – Yes • Q12 – No comment • Q13 – Yes • Q14 – Yes • Q15 – Yes • Q16 – Yes • Q16A – Yes • Q17 – Yes • Q18 - Yes • Q19 – Yes • Q19A – Management of the River Avon: consider the disposal of the riverbed material if dredging is envisaged to mitigate flooding. Presumably as for the River Severn Management Plan. • Q20 – Yes • Q21 – Yes • Q22 – Yes • Q23 – No comment	22.10.08	Noted, relationship with these counties will be explored. Agreed.

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0018.	564 - E(S)	20.10.08	Mrs Pam Craney	Town Clerk, Droitwich Spa Town Council	Town Clerk's Office St Richards House Victoria Square Droitwich Spa Worcs WR9 8DS	• **Responded with covering letter attached to questionnaire (uncompleted).** • Covering Letter states that following detailed consideration at the meeting of the Town Council's Planning Committee on 13th October 2008 'That the Refreshed Issues and Options report be supported.'	22.10.08	Noted.
0019.	536 - E (S)	21.10.08 22.10.08	Alison Dockery R.A. Davis	Environmental Officer, Automated Packaging Systems Ltd Chairman/ Bretforton Parish Council	Enigma Business Park, Sandy's Road, Malvern, Worcs, WR14 1JJ 6 Station Road, Bretforton, Evesham, WR11 7HX	• Q1 – No • Q2 – Yes • Q3 – Yes • Q4 – Yes • Q5 – Yes • Q6 – Yes • Q7 – Yes • Q8 – Yes • Q9 – No • Q10 – Yes • Q11 – Yes • Q12 – No comment • Q13 – Yes • Q14 – Yes • Q15 – Yes • Q16 – Yes • Q16A – Yes • Q17 – Yes • Q18 - No • Q19 – Yes • Q20 – Don't know • Q21 – Yes • Q22 – Yes • Q23 – No comment	22.10.08	Noted
0020.	536-E (S)	22.10.08	R.A. Davis	Chairman/ Bretforton Parish Council	6 Station Road, Bretforton, Evesha, WR11 7HX	• Q1 – No • Q2 – Yes • Q3 – Yes • Q4 – Yes • Q5 – Yes	23.10.08	

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						• Q5A - The policy needs to have a system of monitoring to ensure changes in requirements are capable of being catered for. • Q6 – Yes • Q7 – Yes • Q8 – Yes • Q9 – Yes • Q9A - Whether or not the system is efficient with regard to sustainability objectives in the long term. • Q10 – Yes • Q11 – Yes • Q12 – As for Q9. • Q13 – Yes • Q14 – Yes • Q15 – Yes • Q16 – Don't know • Q16A – Yes • Q17 – Yes • Q18 – Don't know • Q19 – Don't know • Q20 – Don't know • Q21 – Yes • Q22 – Don't know • Q23 – No comment		Agreed. Agreed.
0021.	880 - W	23.10.08	Giles Angell		11 Franchise Street, Kidderminster, Worcs, DY11 6RA	• Answered Don't know to Q1, 9, 12,15 and 17. • Q2 – Yes • Q3 – Yes • Q4 – Yes • Q5 – Yes • Q5A - Delete 'Some will use rail or water to move materials'. Replace with something along the lines 'However to lend credibility to LTP Policies on rail freight positive discrimination would be exercised to harness rail freight. Positive preference for water carriage will accord with LTP policies.	24.10.08	Noted.

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						• Q6 – Yes • Q7 – Yes • Q8 – Yes • Q10 – Yes • Q11 – Yes • Q13 – Yes • Q14 – Yes • Q16 – Yes • Q16A – Yes • Q18 – Yes • Q18A - Social Impact: Intimidation of LGVs to vulnerable road users, militating against walking & cycling strategies, children's independent mobility, increase in Killed & Severe Injury (KSI) incidence. • Extent of LGV empty lorry running. • LGV cost externalised. i.e. big 'take' out of society. • Land use efficiency. Transport dimension of population density. • Q19 – Yes • Q20 – Yes • Q21 – Yes • Q22 – Yes • Q23 – No comment		Agreed. Noted. Noted. Noted.
0022.	683 – F(S)	30.10.08		Director of Development Services Worcester City Council	Orchard House, Farrier Street, Worcester, Worcestershire, WR1 3BW	• Answered Don't know to Q1, 2, 3, 7, 9, 13,14 and 21 • Q2A – ○ If chemical fertilisers are used, could crop residue become contaminated and leach back into the soil? • Maybe a policy/sentence could cover the above eg. Agricultural waste use s appropriate on farmland where it is generated providing there is no potential for contamination • Q3A – What happens if an old quarry does not have a restoration scheme – is this possible? • Q4 – No	31.10.08 Follow up sent 4.11.08	Noted. Defra's advice will be sought regarding specific proposals. Noted. Defra's advice will be sought regarding specific proposals This is not possible for quarries commenced after 1995 when the Environment Act came into effect.

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						• Q4A – Could Archaeology be included? • Q5 – Yes • Q5A – Use the Districts housing allocations document to influence waste site allocations. And need to ensure housing sites could be potential waste sites & visa versa. • Q6 – No • Q8 – Yes • Q10 – Yes • Q11 – Yes • Q12 – No comment • Q15 – Yes • Q16 – Yes • Q16A – Yes • Q17 – Yes • Q18 – No answer • Q19 – Yes • Q19A –The South Worcestershire Joint Core Strategy (SWJCS) will help give an idea for directions of growth. The SHLAA will give an idea of sites being put forward by landowners. • Q20 – No • Q20A – With regards to A3, doesn't think it's a good idea to say waste development can be located anyway in the greenbelt. Maybe say new waste development proposed in the greenbelt should be appropriate and in accordance with PPS2. • Q22 – Yes • Q23 – It has been suggested that the SWJCS is kept track of by Dale Bristow (Strategic Planning) & Steve Harrison (Transport).		Noted. Agreed. Agreed. Agreed. Agreed.
0023.	674-E(S)	30.10.08	Mrs M Williams	Parish Clerk / Wick Parish Council	Ryecot, Owletts Lane, Wick, Pershore, Worcestershire, WR10 3PB	• Q2 – Yes • Q3 – Yes • Q4 – Yes • No further questions were answered.	31.10.08	

Response Reference Number	Consultation Number	Date Received	Name	Job Title/Organisation	Address	Summary of Points Made	Response Acknowledged?	Council's Initial Response
0024.	85 - B	3.11.08 10.11.08	Anna Clark on behalf of British Waterways Persimmon Homes	Alder King Planning Consultants on behalf of British Waterways Persimmon Homes	Pembroke House, 15 Pembroke Road, Bristol, BS8 3BA Persimmon House, Birmingham Road, Studley, Warwickshire, B80 7BG	• In London, British Waterways is promoting the use of canals for freight transport. • The work has revealed there is sound economic case (and environmental and social case) for considering freight by water as a viable alternative to road transport. • Reduce lorry miles, reduce congestion, reduce CO2 emissions & reduce number of HGV related accidents. • Few operations involving movement of waste by water. • Hackney pilot scheme known, as Waste by Water would have been successful however the nature of the vehicles was too inefficient to transport waste. • Powerdays, a waste handling company due to launch a new inter-modal vehicle which will improve the transfer of waste from road to barge. • Present focus on construction materials and waste where source and destination adjacent to canal. • To realise the potential future developments need to enable the collection of domestic waste and recyclables then transported to a waterside waste management facility, therefore some waste facilities need to be provided on the waterside. • Although most policy support, research and best practice case studies are London based there is potential for other locations including Worcestershire. • Request that the Waste Core Strategy DPD acknowledges the positive benefits of transporting waste and recyclates by water. • With this regard transport assessments for waste management development should consider the feasibility of water transport. • The WCS should also consider the benefits of siting strategic sites for waste management development on inland waterways.	4.11.08	Agreed. Agreed. Agreed. Noted. Noted. Agreed. Noted. Noted. Agreed. Noted. Noted.

Response Reference Number	Consultation Number	Date Received	Name	Job Title/Organisation	Address	Summary of Points Made	Response Acknowledged?	Council's Initial Response
						• Whilst taking care to balance the sustainable transport benefits against safeguarding the amenity value and public access to the waterways for tourism and recreation. • British Waterways would like the WCS to encourage new waterside development schemes to be designed to simplify the use of the waterways for movement of waste and materials/minerals. • Reference should be given to 'Planning for Freight on Inland Waterways', DfT/DEFRA April 2004 & PPG13 (Para 45, 10, 13 & Annex B)		Noted. Noted. Noted. The County Council is preparing a specific note on the possibility of using waterways to transport waste.
0025.						• Q1 – No • Q2 – No • Q2A – All Waste should be recorded and monitored by the County Council. • Q3 – No • Q3A – We all require full factual information on how these areas are restored. Years ago locations of mine workings were unrecorded. • Q4 – Yes • Q5 – Yes • Q5A – Vision statement should be kept to one side of A4. • Q6 – Don't know • Q7 – Yes • Q7A – C&D should be kept separate.	11.11.08	This is the Environment Agency's duty but the County will be assisting research to improve the assessment of waste arisings in the County. Noted. Noted. Noted.

Response Reference Number	Consultation Number	Date Received	Name	Job Title/Organisation	Address	Summary of Points Made	Response Acknowledged?	Council's Initial Response
						• Q8 – Yes • Q9 – No • Q10 – Yes • Q11 – Yes • Q12 – No comment • Q13 – Yes • Q14 – Yes • Q15 – Yes • Q16 – Yes • Q16A – Yes • Q17 – Yes • Q18 - No • Q19 – Don't know • Q20 – Yes • Q21 – Yes • Q22 – Yes • Q23 – No comment		
0026.	899 – T	11.11.08	Tony Hyde	Director, Thomas Vale Construction	Lombard House, Worcester Road, Stourport-on-Severn, Worcestershire, DY13 9AP	• Q1 – No • Q2 – Yes • Q3 – Yes • Q4 – No • Q4A – Energy generation could be a potential issue. Local generation and/or distributed energy can tie into the strategy – contact the Energy & Sustainability Team at Birmingham City Council on the work they are doing at present. • Q5 – Yes • Q5A – Should consideration be taken of what will be done with recycled materials, e.g. will they be shipped to China? • Q6 – Yes • Q7 – Yes • Q8 – Yes • Q9 – No Comment • Q10 – Yes	12.11.08	Agreed. The WCS will be subject to a Sustainability Appraisal that will consider related issues.

Response Reference Number	Consultation Number	Date Received	Name	Job Title/Organisation	Address	Summary of Points Made	Response Acknowledged?	Council's Initial Response

						• Q10A – Will C&D waste be monitored based on a sites location or where the company producing the waste is based? Is there a through understanding of the C&D waste that will be generated?
						• Q11 – Don't know
						• Q11A – How can employment numbers relate to requirements for C&D waste? Proposed planning docs may provide a better source for C&D waste.
						• Q12 – Need to be aware of local opinion in locating waste sites as this can produce problems in terms of local public opinion.
						• Q13 – Yes
						• Q14 – Yes
						• Q15 – Yes
						• Q16 – Yes
						• Q16A – Yes
						• Q17 – Yes
						• Q18 - No
						• Q19 – Yes
						• Q20 – Yes
						• Q20A – Except A3 – to protect the greenbelt.
						• Q21 – Yes
						• Q21A – I do not think technologies should be specified as this could potentially limit the development of new technologies.
						• Q22 – Yes
						• Q23 –
						  ○ Greater consideration should be given to energy from waste initiatives as this could provide a route for material that could not be landfilled.
						  ○ Organic farm waste is considered for Anaerobic Digestion to produce biogas, another potential energy source.
								The difficulty of assessing C and D Waste Generation is recognised at all levels of government.
								
								Noted.
								
								Agreed/
								
								Agreed.
								
								Noted.
								
								Noted.

0027.	847 – L	12.11.08	Mr Baden Carlson	Hon Secretary, Lickey Hills Society	30 Beacon Hill, Rubery, B45 9QP.	• Q1 – No • Q2 – No	13.11.08	

Response Reference Number	Consultation Number	Date Received	Name	Job Title/Organisation	Address	Summary of Points Made	Response Acknowledged?	Council's Initial Response
						• Q2A – There ought to be some monitoring of how farmers and landowners are managing their waste. • Q3 – Yes • Q4 – Yes • Q5 – Yes • Q6 – Yes • Q7 – Yes • Q8 – Yes • Q9 – Yes • Q10 – Yes • Q11 – Yes • Q12 – No comment • Q13 – Yes • Q14 – Yes • Q15 – Yes • Q16 – Yes • Q16A – Yes • Q17 – Yes • Q18 – Don't know • Q19 – Yes • Q20 – Yes • Q21 – Yes • Q22 – Yes • Q23 – No comment		Noted, but as explained much agricultural waste is not covered by the Waste Framework Directive and so is outside of Planning Control.
0028.	559-E(S)	14.11.08	Mrs J Crawford	Parish Clerk / Crowle Parish Council	Woodbine Cottage, Sale Green, Droitwich, Worcs, WR9 7LW	• Answered Don't know to Q1, 2, 3, 4, 7, 8, 10, 11, 13, 14, 15, 17, 18, 20, 21 & 22. • Q5 – Yes • Q5A – In the single vision statement "Very little waste" is too vague, there needs to be a target.	14.11.08	Noted.

Response Reference Number	Consultation Number	Date Received	Name	Job Title/Organisation	Address	Summary of Points Made	Response Acknowledged?	Council's Initial Response
						• Q6 – Yes • Q9 – Yes • Q9A – Objectives set out in part 4 • Q12 – No comment • Q16 – Yes • Q16A – Yes • Q19 – Yes • Q19A – Countryside Access & Recreation Strategy, Parish Plans, Rights of Way Improvement Plan • Q23 – No comment		Agreed/
0029.		20.11.08	Mr Steve Plowman	Mineral Valuer/ Rating Team – Wales & West, South London	Quantock House, Paul Street, Taunton, Somerset, TA1 3PF	Acknowledged receipt of letter & questionnaire, had no comment to make.	20.11.08	
0030.	834 – L	20.11.08	M Victory		Greenways, 200 Wells Road, Malvern wells, Worcestershire	• Q1 – No • Q2 – Yes • Q3 – Yes • Q4 – No • Q4A – Preservation of historic character of the Geopark & AONB – See Geopark & Natural England websites. • Q5 – Yes Q5A – Commercial waste is largely exempt from recycling & should be regulated so more waste can be recovered. Figures in report show % of industrial waste recycled but no % of commercial recycled. • Q6 – Yes • Q7 – Yes • Q8 – Yes • Q9 – Yes • Q9A – Separate figures for recycled domestic, commercial and construction waste. • Q10 – No	20.11.08	Agreed. Noted. Agreed.

Response Reference Number	Consultation Number	Date Received	Name	Job Title/Organisation	Address	Summary of Points Made	Response Acknowledged?	Council's Initial Response
						• Q10A – Malvern Hills is a very long narrow district and as waste should travel as little as possible; Tenbury is closer to waste collection sites. • Q11 – Yes • Q11A – Yes: But see comment to Q10A. • Q12 – 1) Ways of reprocessing waste – anaerobic, aerobic, waste separation, energy from waste (CHP). Not just incineration or sustained landfill. 2) Energy derived from waste! • Q13 – No • Q13A – Figures produced 'a year or two out of date' are not good enough. Actual figures should be available immediately; actual real-time figures should be monitored. • Q14 – No • Q14A – See Q13A • Q15 – No • Q15A – Too approximate for realistic appraisal. • Q16 – No comment • Q16A – No, Length of time taken to create Waste Core Strategy is too long. Implement 2010? • Q17 – Yes • Q17A – Yes: But see Q16A • Q18 – Yes • Q18A – Energy needs; plastic waste can create heat & power. Waste transportation efficiency (rail/water). • Q19 – Yes • Q19A – Malvern Hills Geopark – Increased use of rail & water transport through transfer adjacent to services • Q20 – No • Q20A – First establish the means of disposal, & then apply them to area & available land & facilities. CHP ideal for eco-villages. Landfill always needed adjacent to towns. Digesters & incinerators needed adjacent to medium towns.		Noted. Noted. Noted. This data does not exist at present. Noted. Noted. Noted, but this is government policy. Noted. Agreed. Noted.

Response Reference Number	Consultation Number	Date Received	Name	Job Title/Organisation	Address	Summary of Points Made	Response Acknowledged?	Council's Initial Response
						• Q21 – No • 21A – Some technologies must be specified. No 'innovative technologies' or 'stifled' technologies in use as noted in report. Plastic is energy, very hard to separate for recycling – so use it as energy in smallish units, carefully controlled to avoid dioxins etc. • Q22 – No • Q22A – It is wrong model to base planning upon. The important factors are volume, road miles and energy gain. What does outdoors mean? Windrow? Outdoors/Indoors, what is the significance? Sites should be freely ventilated and removed from areas of significant housing if possible. • Q23 – 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?		Noted, but government policy warns against the problems over specification might cause. Noted. These issues will be explored further.
0031.	576-E(S)	20.11.08	Mr M Broughton-Taylor	Parish Clerk/ Flyford Flavell Grafton Flyford North Piddle Parish Council	Columbine Cottage, North Piddle, Grafton Flyford, Nr Worcester, Worcestershire.	• Q1 – No • Q2 – Yes. • Q3 – Yes • Q4 – Yes • Q5 – Yes • Q5A – Should include statement on minimising waste by addressing excessive & superfluous packaging, particularly from large retailers – all should be obliged to offer immediate removal of and recycling for plastics/cardboard etc. • Q6 – Yes • Q7 – Yes • Q8 – Yes • Q9 – No • Q10 – Yes • Q11 – No • Q11A - % for Redditch & Wyre Forest seem too small. % for Wychavon too large considering the little commercial/industrial activity there is.	20.11.08	Noted, but this is largely outside our control. Noted, but these percentages reflect the RSS.

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						• Q12 – No comment. • Q13 – Don't know • Q14 – Don't know • Q15 – Don't know • Q16 – Yes • Q16A – Yes • Q17 – Yes • Q18 – Yes • Q18A – Have regard for local parish plan & village design statements. • Q19 – Yes • Q20 – Yes • Q21 – Yes • Q22 – Don't know • Q23 – No comment		Agreed.
0032.		21.11.08	Eva Neale	Planning Assistant/ Warwickshire County Council	Environment & Economy, PO BOX 43, Shire Hall, Warwick, CV34 4SX	• **Responded by letter.** • Little mention of cross boundary transfer of waste from Warwickshire into Worcestershire. • This was an issue picked up by GOWM with regards to Warwickshire's Core Strategy	25.11.08	Agreed. Noted.
0033.	653-E(S)	24.11.08	Mrs D Dean	Parish Clerk/ Stock & Bradley Green Parish Council	Midsummer House, Earls Common Road Stock Green, Redditch, Worcestershire, B96 6SY	• Q1 – No • Q2 – Yes • Q3 – Yes • Q4 – Yes • Q5 – Yes • Q6 – Yes • Q7 – Yes • Q8 – Yes • Q9 – Don't know • Q10 – Yes • Q11 – Yes • Q12 – No comment • Q13 – Yes • Q14 – Yes	25.11.08	Noted.

Response Reference Number	Consultation Number	Date Received	Name	Job Title/Organisation	Address	Summary of Points Made	Response Acknowledged?	Council's Initial Response
						• Q15 – Yes • Q16 – Yes • Q16A – Yes • Q17 – Yes • Q18 – No • Q19 – Yes • Q20 – Yes • Q21 – Yes • Q22 – Yes • Q23 – No comment		
0034.	898 – T	24.11.08	Edward Roberts		Grafton Barn, Grafton Flyford, Worcester, Worcestershire, WR7 4PG	• Q1 – No • Q2 – Yes • Q3 – Yes • Q4 – Yes • Q5 – Yes • Q6 – Yes • Q7 – Yes: Why not Radioactive Waste? • Q8 – Yes • Q9 – Yes • Q9A – Revenue from Recycling • Q10 – Yes • Q11 – Yes • Q12 – No comment • Q13 – Don't know • Q14 – Don't know • Q15 – Don't know • Q16 – Yes • Q16A – Yes • Q17 – Yes • Q18 – No Comment • Q19 – Yes • Q20 – Yes • Q21 – Yes: But new technologies should be on constant review	25.11.08	Noted. Government advice has been sought to see if this is necessary and, if so, how it might be addressed. Noted. Agreed.

Response Reference Number	Consultation Number	Date Received	Name	Job Title/Organisation	Address	Summary of Points Made	Response Acknowledged?	Council's Initial Response
						• Q22 – No Comment: Identify & monitor sites against Regional Plan • Q23 – No comment		Agreed.
0035.		26.11.08	Mr F Fawcett		14A Foley Gardens, Stoke Prior, Bromsgrove, B60 4LD	• Q1 – No • Q2 – Yes • Q3 – Yes • Q4 – Yes • Q5 – Yes • Q5A – Vegetation in gardens keeps growing/multiplying & only so much can be recycled at home. More consideration should be given to free collection of this surplus waste to be treated/recycled & sold back to the community as compost. Incineration should be considered by means of producing heating for homes & businesses. • Q6 – No – Doesn't know why they have been revised. • Q7 – Yes • Q8 – Yes • Q9 – No • Q10 – Yes • Q11 – Yes – However does not understand why Bromsgrove should have the smallest percentage as it is expanding/ developing both commercially & in housing. • Q12 – Monitor how each local area is managing the strategy & whether or not they are commercially & soundly based; by regular reporting & publication of results. • Q13 – Yes • Q14 – Yes • Q15 – Yes • Q16 – Yes • Q16A – Yes • Q17 – Yes • Q18 – Yes	26.11.08	Noted. This issue will be explored in the JMWMS. Noted, but the percentage reflects regional policy. Noted, but it is not easy for the Council to assess the commercial soundness of private operations.

Response Reference Number	Consultation Number	Date Received	Name	Job Title/Organisation	Address	Summary of Points Made	Response Acknowledged?	Council's Initial Response
						• Q18A – Landscaping & blending in with the local environment & ambience of the local area. • Q19 – Yes • Q20 – Yes • Q21 – No • Q21A – Should specify a priority list of management technologies, which should be followed. • Q22 – Yes • Q23 – 1) More consideration should be given in turning our waste into energy saving form of heating; gas, as respondent understands many Scandinavian countries do, therefore making us less independent on imported & expensive fuels. 2) During the construction of the M1 motorway near Birmingham, Sand & Gravel was excavated and the resulting quarry filled with green waste from which gas is now extracted sufficient for all the Birmingham NEC requirements.		Agreed. Noted, but this is not government or regional policy. Noted. Alternative scenarios will explore these. Noted.
0036.	829-L	28.11.08		Duckworth Worcestershire Trust	The Pumpkinhouse Environment Centre, Waterworks Road, Barbourne, Worcester, WR1 3EZ	• Q1 – No: But still needs policies to link with national framework for disposal of radioactive waste, considering moves by government to increase nuclear power stations. • Q2 – Yes • Q3 – Yes • Q4 – Yes • Q5 – Yes • Q6 – Don't know • Q7 – No • Q7A – Should include measures of dealing with radioactive waste locally.	28.11.08	Noted – see comment ref 0034 Q7. See comment re Q1 above.

Response Reference Number	Consultation Number	Date Received	Name	Job Title/Organisation	Address	Summary of Points Made	Response Acknowledged?	Council's Initial Response
						• Q8 – Don't know • Q9 – Don't know • Q10 – Yes • Q11 – Don't know • Q12 – No comment • Q13 – Don't know • Q14 – Don't know • Q15 – Yes • Q16 – Yes • Q16A – Yes • Q17 – Yes • Q18 – No • Q19 – Yes • Q20 – No • Q20A – A2; C2; D2 • Q21 – No • Q21A – WCS should give a breakdown of which technologies may be used & what the criteria are for selection. • Q22 – Yes • Q23 – No comment		Noted. The issue will be explored further.
0037.		2.12.08	Lisa Preece		56 Lansdowne Street, Worcester, WR1 1QF	• Q1 – No • Q2 – Yes • Q3 – Yes • Q4 – Yes • Q5 – Yes • Q5A – It would be useful to add something about involving local communities in decisions about treating their waste, encouraging local responsibility & encouraging the involvement of colleges & universities in developing new technology. • • Q6 – Yes • Q7 – Yes • Q8 – Yes • Q9 – Don't know	2.12.08	Agreed.

Response Reference Number	Consultation Number	Date Received	Name	Job Title/Organisation	Address	Summary of Points Made	Response Acknowledged?	Council's Initial Response
						• Q10 – Yes • Q11 – Yes • Q12 – Don't Know • Q13 – Yes • Q14 – Yes • Q15 – Yes • Q16 – Yes • Q16A – Yes • Q17 – Yes • Q18 – No • Q19 – Yes • Q20 – No • Q20A – A mixture of larger & smaller waste management facilities would be better to enable facilities to be placed near where needs arise. Plus this would provide more diverse facilities & make it easier to give permission, as, in my opinion, larger facilities would attract more opposition. The above arguments would also be applicable for the centralised/ dispersed facilities debate. • Q21 – Yes • Q22 – Yes • Q23 – Draft Vision Statement 'Very little material will be considered unusable' – in order to make this closed loop system viable. Councils need to encourage business reuse of materials – if there is no market for the reuse of material then there is no use recycling it: consideration should be given to local provision for resource centres etc for use by all kinds of businesses- it is important this type of business is not centralised as small businesses won't have the time or money to travel to supplies. Whether this should be a part of the Core Strategy is another question but it should be considered somewhere. Local reuse of local waste is the most sustainable.		Noted. Alternative scenarios will explore these. Noted.

Response Reference Number	Consultation Number	Date Received	Name	Job Title/Organisation	Address	Summary of Points Made	Response Acknowledged?	Council's Initial Response
0038.		2.12.08	Robin Hardwick		8 Heightington Place, Stourport-on-Severn, DY13 0BE	• Q1 – No • Q2 – Yes • Q3 – Yes • Q4 – Yes • Q5 – Yes • Q6 – Yes • Q7 – Yes2.12.08 • Q8 – No Comment • Q9 – Yes • Q9A – Fly Tipping – See Question 23 • Q10 – Yes • Q11 – Yes • Q12 – No comment • Q13 – Yes • Q14 – Yes • Q15 – Yes • Q16 – No • Q16A – Yes • Q17 – Yes • Q18 – Yes • Q18A – See Question 23 • Q19 – Yes • Q20 – Yes • Q21 – Yes • Q22 – Yes • Q23 – ○ Believes the approach to fly tipping should be changed. ○ Has witnessed a huge increase in fly tipping in rural Worcestershire. ○ Criminalising those guilty has very little effect, mainly because the law cannot be adequately enforced for economic & practical reasons.		Agreed. Noted. This issue will be explored with the Environment Agency.

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						○ Fly tippers are broadly employed by the public to carry our small services e.g. Hedge cutting, laying paths & disposing of accumulated rubbish not covered by municipal waste collection services. The problems arises when they dispose the debris, usually in farm gateways & country lanes. ○ The cost of removing the fly tipped waste is far out of proportion to the size of the heap. ○ Why do the "fly tippers" risk apprehended & a hefty fine? It must be because the cost of dealing with these small loads of rubbish legitimately is too high. ○ Suggests authorities should provide SMALL commercial vehicles to use household waste sites free of charge. This would prevent fly tipping from occurring. ○ The small revenue in fees would be compensated by the huge savings; the cost of dealing with the 'criminals' who fly tip.		
0039.	351-C	4.12.08	Eileen Austin			**Responded by Telephone** They won't have time to respond in this consultation period but will try to be involved in future consultation.		Noted.
0040.		4.12.08	Alan Pew	Machine Tools Redditch		**Responded by Telephone** As far as he was aware the WCS was dead and buried a year ago and was not aware the process had restarted. His business spends many thousands of pounds on waste management however the deadline (19th Dec) is too close for him to respond.		Noted.

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0041.		4.12.08	Keith Tween	Asbestos Surveying Ltd		**Responded by Email** • The document is excellent and reflects substantial work on the subject. • ASL can only comment. • Only comments are that landfill appears to be the only current or cost effective solution to asbestos related matters and removing the material from the open environment. To that end, the amount of asbestos requiring removal is likely to rise steadily and cannot just be stemmed by stating that quantities sent to landfill must reduce!! • The only alternative 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.	10.12.08	Noted.
0042.		5.12.08	R. Rowe	Carpets of Kidderminster Ltd	Wilden Lane, Stourport-on-Severn, DY13 9LW	• Q1 – No • Q2 – Yes • Q3 – Yes • Q4 – Yes • Q5 – Yes • Q6 – Yes • Q7 – Yes • Q8 – Yes • Q9 – No • Q10 – Yes • Q11 – Yes • Q12 – No comment • Q13 – Yes • Q14 – Yes • Q15 – Yes • Q16 – Yes • Q16A – Yes • Q17 – Yes • Q18 – No • Q19 – Yes • Q20 – Yes • Q21 – Yes • Q22 – Yes • Q23 – No comment	10.12.08	Noted

Response Reference Number	Consultation Number	Date Received	Name	Job Title/Organisation	Address	Summary of Points Made	Response Acknowledged?	Council's Initial Response
0043.		5.12.08	Mitch Gibson	Health, Safety & Environmental Advisor/ Koito Europe Ltd.	Kingswood Road, Hampton Lovett Industrial Estate, Droitwich Spa, Worcestershire, WR9 0QH	**Responded by letter** • Company instigated a 'reduce, re-use, recycle' programme in 2005 proving very successful: reduction of 90% of waste being landfilled. • Utilise 3rd party waste contractors to assist in recycling; majority of contractors within 25miles of the companies location. • Recycle around 90% of the physical waste produced by the company's processes. • They have issues whereby they cannot recycle some of the hazardous waste produced. • The company has a number of different waste streams & have willing 3rd party contractors in place to deal with them all. • Through sourcing local companies to deal with the waste, we generate revenue for waste that can be recycled, save on landfill costs & also transport costs. • Now focusing on the reduction of energy usage within the company & whether feasible to transfer wasted heat from our destruction processes to heating the plant.	10.12.08	Noted. Waste minimisation and energy from waste will be explored further.
0044.		5.12.08	D.K. Symes	D.K. Symes Associates	Appletree Farmhouse 39 Main Road Middleton Cheney Banbury Oxfordshire OX17 2ND	**Responded by e-mail** • Does not propose to make any representation at this time, as he is currently not active in the county. • He would like to be kept on the circulation list for future consultation.		Noted.
0045.		5.12.08	Phil Humphreys	Pendragon Presentation Packaging Ltd.	The Haysfield, Malvern, Worcs, WR14 1GF	**Responded by e-mail** • Pendragon Presentation Packaging Ltd is presently exploring the best way to dispose of their waste. • Contractor takes a small percentage of non-recyclable waste on a weekly basis. • Have a recycle unit with 2 chambers; one for plastics, one for cardboard; this bales the product for collection.	10.12.08	Noted. Value of providing on site storage of waste will be explored further. Respondent referred to County Waste Management.

Response Reference Number	Consultation Number	Date Received	Name	Job Title/Organisation	Address	Summary of Points Made	Response Acknowledged?	Council's Initial Response
						• Have an outlet for plastics & still gain some financial return, however cardboard is more of a problem. Would the Council be able to help, would like to discuss with someone.		

0046.		6.12.08	Mike Davis	Clerk, Lower Broadheath Parish Council		• Q1A – Possible requirement for electronic equipment under WEEE Directive.
						• Q2 – No
						• Q2A
						  ○ Both human & animal faeces should be subject to anaerobic digestion; methane produced from this to be used as fuel to generate electricity to offset the substantial electricity consumption of the water utilities.
						  ○ Any sewage disposal expansion should focus upon anaerobic digestion.
						• Q3 – Yes
						• Q4 – No
						• Q4A
						  ○ The current core strategy regards waste as a nuisance; this shows a very limited vision.
						  ○ Household & businesses should be encouraged to pre-sort waste into segregated collections using financial rewards.
						  ○ 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.
						• Q5 – No
						• Q5B – The vision should focus upon recovery of waste as a fuel for offsetting the energy used to process the waste into useful materials. This is mentioned but more as a passing remark than a strategic aim.
							10.12.08	Noted.
								
								Noted. Waste water treatment issues will be explored with Water Authorities.
								
								Noted.
								
								Noted. JMWMS under review.
								
								Noted. JMWMS under review.

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						• Q6 – No
						• Q6A
						  ○ Little or no methodology has been thought through as to how the objectives will be realised e.g. the original objectives stated a need to create markets for the sorted materials. These markets remain unidentified for many materials. Currently have a waste paper mountain as the market in China for this waste, to turn it into cardboard for boxes, has collapsed. The fall back position is landfill.
						  ○ Where is the positive desire to convert excess waste to fuel?
						• Q7 – No
						• Q7A – See reply to Q2A. More sensible to have a plant to serve both local agricultural requirements & public waste materials rather than farmers installing small-scale anaerobic digesters.
						• Q8 – No
						• Q8A
						  ○ Targets are essentially political aspirations; the use of waste as a resource is an intensely practical matter.
						  ○ A large expensive waste plant needs to collect waste from a wide area to be economically viable however this will have environmental effects.
						• Q9 – No
						• Q9A – Need to decide what waste treatment policy will be adopted. A key factor here depends on upon the degree of material segregation that the householder will be asked to perform.
						• Q10 – No
								Noted.
								
								Noted.
								
								Noted. Most targets are however imposed by central government.
								
								Noted. JMWMS under review.

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						• Q10A
						  ○ 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 & thus only a guesstimate of waste type from each district is made.
						  ○ Better to establish dimensions of the problem before allocating solutions.
						• Q11 & Q12 – Not only should this situation be monitored for the future, it's current dimensions need to be established first.
						• Q13 – Yes
						• Q14 – Yes
						• Q15 – No Comment
						• Q16 – Yes
						• Q16A – Yes
						• Q17 – No comment
						• Q18 – No
						• Q19 – Yes
						• Q20 – Yes with exception of B1.
						• Q20A – As discussed in Q2A some farms have anaerobic digestion plants therefore it is not sensible to place any limit on rural location.
						• Q21 – No
						• Q21A – A more focused approach on the conversion of waste to fuel is required within future reports. Lack of focus is restricting view of waste and thus a lack of vision to dealing with waste.
						• Q22 – This is not a concept, as any conceivable solution can be fitted within the list provided.
						• Q23 – See comments throughout response.
								Noted.
								Agreed.
								Agreed.
								Agreed.
								Agreed. The Council is working with other agencies to improve the quality of waste data.
								Noted.
								Noted.
								Noted.
								Noted.

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0047.		9.12.08	Lesley King	Focsa Services UK Ltd	2nd Floor Mitchell Hey Place, Mitchell Hey Mills, College Road, Rochdale OL12 6AE	• Q1 – No • Q2 – Yes • Q3 – Yes • Q4 – Yes • Q5 – Yes • Q6 – Yes • Q7 – Yes • Q8 – Yes • Q9 – Yes • Q9A – Recycling % Tonnes to Landfill • Q10 – Yes • Q11 – Yes • Q12 – Current measures are sufficient. • Q13 – Yes • Q14 – Yes • Q15 – Yes • Q16 – Yes • Q16A – Yes • Q17 – Yes • Q18 – No • Q19 – Yes • Q20 – Yes • Q21 – Yes • Q22 – Yes • Q23 – No comment	11.12.08	Agreed. Noted.
0048.		9.12.08	Alexa Williams	Planning Officer, Development Plans/ Redditch Borough Council Planning Services		**Responded by e-mail** • Officers agree with the Strategy. • With reference to the Draft Vision Statement that states the preferred location for waste related development will be previously developed land ahead of Greenfield land, it should be noted that there is a limited amount of previously developed land available within Redditch.	11.12.08	Noted. Noted.

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0049.	900 – T	9.12.08	Chris Hayes	Plant Manager/ Vamix NV (UK) Branch.	Martley Road, Lower Broadheath, Worcester, Worcestershire, WR2 6RF	• Q1 – Yes • Q1A – Food Waste • Q2 – No • Q3 – No • Q4 – Yes • Q5 – Yes • Q6 – Yes • Q7 – Yes • Q8 – Yes • Q9 – No • Q10 – Yes • Q11 – Don't Know: Need to review business operators in the areas. • Q12 – No comment • Q13 – Don't Know • Q13A – Many local companies (contractors) are handling current waste streams & perhaps there will be more specific to meet the needs of the area rather than generic. • Q14 – Yes • Q15 – Yes • Q16 – Yes • Q16A – No: Monitor annually, review bi-annually as demographics are constantly changing. • Q17 – No • Q17A – 5 years is too long a gap. • Q18 – Yes • Q19 – Yes • Q20 – Yes • Q21 – No • Q21A – Should be set as part of the plan & reviewed every couple of years in order to identify advances. • Q22 – Yes • Q23 – No comment	11.12.08	Noted. Noted. Noted. Noted. Noted. Noted.

Response Reference Number	Consultation Number	Date Received	Name	Job Title/Organisation	Address	Summary of Points Made	Response Acknowledged?	Council's Initial Response
0050.		10.12.08		J. Cullen Thermals Ltd	202 Dykin Avenue, Witton, Birmingham, B6 7BH	• Q1 – No • Q2 – Yes • Q3 – Yes • Q4 – Yes • Q5 – Yes • Q6 – Yes • Q7 – Yes • Q8 – Yes • Q9 – No • Q10 – Yes • Q11 – Yes • Q12 – All seems to be covered • Q13 – Yes • Q14 – Yes • Q15 – Yes • Q16 – Yes • Q16A – Yes • Q17 – Yes • Q18 – No • Q19 – Yes • Q20 – Yes • Q21 – Yes • Q22 – Yes • Q23 – No comment	11.12.08	Noted.
0051.		11.12.08	Peter Matthews CMG	Chairman/ Black County Metals Ltd	Stambermill House, Bagley St, Lye, Stourbridge DY9 7AY	• Q1 – No • Q2 – Yes • Q3 – Yes • Q4 – Yes • Q5 – Yes • Q5A – It is important to communicate the strategy in a simple way – an understanding of it will make implementation much easier. • Q6 – Yes • Q7 – Yes • Q7A – Agrees however the commercial aspects should be well considered.	11.12.08	Noted. Noted.

Response Reference Number	Consultation Number	Date Received	Name	Job Title/Organisation	Address	Summary of Points Made	Response Acknowledged?	Council's Initial Response
						• Q8 – Yes • Q9 – Yes • Q9A – Monitor the awareness of the people of the County. • Q10 – No • Q10A – Not necessarily so what is needed in good overall management. • Q11 – Yes • Q12 – A responsible audit needs to continually take place. • Q13 – Yes • Q14 – Yes • Q15 – Yes • Q16 – Yes • Q16A – Yes • Q17 – Yes • Q18 – Yes • Q18A – There is a need to underline the sustainability of the project through recycling for example. • Q19 – Yes • Q19A – Be aware of fast changing (European) legislation that could impact these projects • Q20 – Yes • Q21 – Yes • Q21A – Developing technologies will have a wide ranging impact over the next few years especially in the area of recycling • Q22 – Yes		Noted. Noted. Noted. Agreed. Agreed. Agreed/

Response Reference Number	Consultation Number	Date Received	Name	Job Title/Organisation	Address	Summary of Points Made	Response Acknowledged?	Council's Initial Response

						• Q23
						  ○ Needs to be wide-ranging view & good communication to make it work.
						  ○ Commercially the right people (contractors) should be used – not necessarily the biggest & most favoured but those that can take care and interest in their responsibilities.
								Agreed.

0052.		12.12.08	Simon Townsend	Operations Director, Wyvern Furniture Trade Business Limited	Units 13/15, Hartlebury Trading Estate, Hartlebury, Nr. Kidderminster, Worcs, DY10 4JB	• **Responded by letter** • Struggled with the 74 page document & does not feel qualified to comment. • The company has attempted to reduce their waste in an attempt to 'do the right thing' and reduce the spiralling waste disposal costs. • The company segregates, bales & sells their cardboard & plastic waste, & compacts all general waste in an attempt to save on costs.	12.12.08	Noted.
0053.		12.12.08		D E Talbot Transport, Summerway Landfill	Wilden Lane. Stourport, DY13 9JP	• Q1 – Yes • Q1A – Road planning's from Worcestershire County roads generated by Worcestershire Working Highways. 2008 approx 300,000 tonnes. • Q2 – Yes • Q3 – Yes • Q4 – Don't know • Q5 – Don't know • Q6 – No Comment • Q7 – No • Q7A – C&D waste is often re-used. Too much legislation will destine it to landfill, not reduce the waste • Q8 – Yes • Q9 – No • Q10 – No • Q10A – As certain areas or districts have different geographical factors, e.g. Malvern Hills with Redditch. • Q11 – Don't know • Q12 – No Comment	12.12.08	Noted. Annual survey in hand. Noted. Noted.

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						• Q13 – No
						• Q13A – EA do not monitor exempt sites close enough.
						• Q14 – No Comment
						• Q15 – Yes
						• Q16 – Yes
						• Q16A – Yes
						• Q17 – Don't know
						• Q18 – Yes
						• Q18A – Greenbelt sites have to be recognised. Recycling does not permit premium rate industrial sites due to handling a bulky low value product.
						• Q19 – Yes
						• Q19A – Highway resurfacing
						• Q20 – No
						• Q20A
						  ○ A3 should be more relaxed
						  ○ B1 see Q18 (quote)
						  ○ C1 larger sites more impact
						  ○ D1 more transport = carbon footprint.
						• Q21 – Yes
						• Q22 – Yes
						• Q23 – Issues as when a waste becomes a product. Green Belt. Existing site contamination. Waste planning talking to highways department.
								Agreed.
								
								Agreed.
								
								Noted.
								
								Agreed.

0054.		15.12.08	Stephen Perks	Sheq Manager, Permadoor		• **Responded by e-mail** • Have a diverse management waste stream & use various contractors to manage their waste. • Currently reuse & recycle where possible. • Refer to the waste management procedure & list of approved contractors attached to the email response.	17.12.08	Noted.

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0055.		15.12.08	Mrs Jo Hyrons	Clerk to Hartlebury Parish Council	Hilltop House, 48 Park Lane, Bewdley, Worcestershire, DY12 2EU	• **Responded by letter** • Refreshed Issues & Options Report discussed at the last Hartlebury Parish Council meeting. • The individual issues raised in the strategy are complex and the Council does not feel able to respond to each question supplied on the questionnaire.	17.12.08	
						• The Council are in complete agreement that waste minimisation rather than waste disposal must be Worcestershire's top priority.		Agreed.
						• The way forward is to reduce the amount of waste produced & increase recycling rates – The Council would very much like to see policies put in place for achieving this.		Agreed.
						• Hartlebury has endured more than its fair share of waste disposal over the last few decades (3 landfills in a small rural parish) & would like it to be placed on record that the Hartlebury residents have "done their bit" & the County need to look elsewhere to manage their waste.		Noted.

0056.		16.12.08	Ivor Pumfrey	Herefordshire & Worcestershire Joint Waste Resource Management Forum	Head of Customer & Environmental Services, Malvern Hills District Council, The Council House, Malvern, WR14 3AF	• Q1 – No
						• Q2 – Yes
						• Q3 – Yes
						• Q4 – No
						• Q4A
						  ○ Draft Spatial Portrait makes no reference to the joint contractual arrangements with Herefordshire Council for the disposal of MSW.
						  ○ The joint contract may have implications for how many municipal waste management facilities are located within Worcestershire in relation to both waste arising from & facilities located within Herefordshire.
							17.12.08	Noted.

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						○ Need to include reference to Herefordshire's planning framework for the same reasons. It is probably worth stating that the two Counties planning frameworks should take account of each other. • Q5 – Yes • Q5A ○ Draft Vision Statement is consistent with both the extant & emerging draft revision of the JMWMS. ○ Especially pleased to see the emphasis of waste minimisation & treating waste as a resource. ○ Would prefer to see more robust wording as if the waste should be regarded, as a source of useful material then it isn't really a waste & shouldn't be thrown away. We suggest '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 used beneficially & treated so far as possible in Worcestershire itself. ○ Joint arrangements with Herefordshire need to be recognised in the detailed text underpinning the vision statement.		Noted.
						• Q6 – No: There is a need to take account of Herefordshire planning framework due here to the Integrated Waste Management Contract. • Q7 – Yes • Q8 – Yes: Having regard to previous comment about joint agreements with Herefordshire. • Q9 – Yes • Q9A – JMWMS include targets for, & measures of reductions in MSW to landfill & recycling/composting. These are relevant & useful means of monitoring success of the WCS.		Agreed. Agreed. Agreed.

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						• Q10 – Don't know – do not feel equipped to respond to this question.
						• Q11 – Don't know
						• Q12 – See response to Q9A.
						• Q13 – No
						• Q13A
						  ○ Only shows what has been used 2 years ago it does not show the gap between the licence capacity & throughput.
						  ○ Thinks the 'Notional Gap' should be used, as that is what has been provided.
						• Q14 – No
						• Q14A – Suggests using the gap between the 'Notional Capacity' minus 10% (to cover market conditions) & the targets for diversion from landfill (RSS).
						• Q15 – Yes
						• Q16 – Yes
						• Q16A – Yes
						• Q17 – Yes
						• Q18 – No
						• Q19 – Yes
						• Q19A – Herefordshire Waste Core Strategy or equivalent document.
						• Q20 – Yes subject to previous comments about joint working arrangements with Herefordshire.
						• Q21 – Yes
						• Q22 – Yes
						• Q23 - No Comment
								Noted.
								
								Noted.
								
								Agreed/
								
								Noted.

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0057.		16.12.08	Unknown	Unknown	Unknown	• Q1 – No • Q2 Don't know • Q3 – Yes • Q4 – Don't know • Q5 – yes • Q5A – Local Incinerators & maybe use the incinerator to fuel waste site to reduce costs. • Q6 - Yes • Q7 - Yes • Q8 – Yes • Q9 – Don't know • Q10 Don't know • Q11 – Yes • Q12 – Recycling free to household residents but businesses have to pay for receptacles. More businesses would recycle if there were receptacles offered = less to landfill. • Q13 – Yes • Q14 – Don't know • Q15 – Don't know • Q16 – Yes • Q16A – Yes • Q17 – Yes • Q18 – No • Q19 – Don't know • Q20 – Yes • Q21 – Don't know • Q22 – Don't know • Q23 – No Comment		Noted. Agreed.
0058.	800 – L	16.12.08	Tom Richards	Worcestershire Geodiversity Manager, Herefordshire & Worcestershire Earth Heritage Trust	Geological Records Centre, University of Worcester, Henwick Grove, Worcester, Worcs, WR2 6AJ	• Q1 – No • Q2 – Yes • Q3 – Yes • Q4 – Yes • Q5 – Yes • Q6 – Yes – Addition of Geodiversity Action Plan	17.12.08	Agreed/

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						• Q7 – Yes • Q8 – Don't know • Q8A – Local Planning should be done on a local basis without unelected regional quandaries dictating policy therefore local & realistic targets should be set. Unfortunately there is little evidence of local targets working to date. • Q9 – Yes • Q9A – The effect of waste management on biodiversity, geodiversity & the historic environments, as well as people. • Q10 – Don't know • Q10A – Need evidence on whether district or county allocated waste management capacity works in other two tier county systems. • Q11 – Don't know • Q11A – Where is there land capacity within Worcester City boundary to develop new waste management? • Q12 – No Comment • Q13 – Yes • Q14 – Don't know • Q15 – Don't know • Q15A – Where have the figures come from in Q15? • Q16 – Yes • Q16A – Yes • Q17 – Yes • Q18 – No • Q19 – Yes • Q20 – Yes • Q21 – Yes • Q22 – Yes • Q23 – No Comment		Noted. Agreed. Noted. Noted. Noted.

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0059.		16.12.08	Malcom Watt	Planning Officer, Cotwolds Conservation Board	Fosse Way, Northleach, Gloucestershire, GL54 3JH	• **Responded by letter** • The board has previously supported the submission draft WCS. • Q19 – AONB Management Plans should be included, have a 5-year timescale & will be revised at least four times during the life of the WCS.	17.12.08	
0060.	717 - H (S)	16.12.08	Antony Muller	Worcestershire Land Management Team/ Natural England	Block B, Government Buildings, Whittington Road, Worcester, Worcs, WR5 2LQ	• Q1 – No • Q2 & Q3 - Yes ○ Acknowledges the rationale behind the proposal to exclude specific policies to manage organic agricultural waste, forestry waste & waste arising from mineral extraction. ○ The next stage of the WCS should prepare the way for policy wording (& supporting text) that enables rather than constrains the potential relationship between the proposed excluded wastes & waste streams addressed in the report. ○ By way of example i) Waste products arising from generally rural land use (farm & forestry wastes), for potential use as a resource for eg. Energy or other end uses. We are thinking here of, for example, combined heat & power plants with the capability to use a range of waste products, & conversely ii) The scope for wastes arising from the urban environment to be put to beneficial use in the farmed landscape. ○ Taken together it would appear that land within the green belt &/or around towns in rural areas offers particular scope for such activities, suitability guided by relevant Planning Policy Statement Criteria.	17.12.08	Agreed.

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						○ The WCS need not be specific about what the uses are. The WCS document should leave scope for new approaches to these waste streams, related technologies & the interplay with wider waste management practices. • Q4 – Yes • Q5 – Yes • Q6 – No ○ Unclear what 'locally distinctive' means in this context, though we take it to mean that the objectives are essentially fit for purpose taking into consideration the local flavour that the WCS will be required to demonstrate. ○ Feels the 'test' objective on page 33 needs to be flagged up as the 'ideal' or 'aspirational' objective & one which, in order to be reasonably implemented, must be informed by the degree to which the proposal meets 'bedrock' criteria. As it stands the test objective looks doomed to fail if only because you can never please everyone. • Q7 – Don't know • Q7A – refer to Q2 & 3 comments • Q8 – Yes • Q9 – No • Q9A – Please refer to letter of 8th September 2008 addressed to Natasha Amos on the "Joint Sustainability Appraisal Framework Paper for LPAs in Worcestershire". • Q10 – Don't know • Q11 – Don't know • Q 12 – "BPEO" should feature here so as to inform decisions regarding what to monitor & how. • Q13 – Don't know • Q14 – Yes • Q15 – Don't know		Agreed. Noted. Noted. Noted.

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						• Q16 – Yes • Q16A – Yes • Q17 – Yes • Q18 – Yes • Q18A - Soil • Q19 – Yes • Q19A – Worcestershire Minerals LDF. RSS Phase II material. • Q20 – Yes • Q21 – Yes • Q21A – WCS might quote typical technologies at the onset of the plan with a clear statement the developing nature of the sector & the expectation that the WCS will evolve to embrace these. • Q22 – Yes • Q23 – No Comment		Agreed. Agreed/
0061.	680 – F(S)	16.12.08	Dave Hammond	Head of Planning Services, Bromsgrove District Council	Council House, Burcot Lane, Bromsgrove, Worcs, B60 1AA	• Answered Don't know to Q1, 2, 4, 9, 10, 13, 14, 15, 21, 22 • Q3 – Yes • Q5 – Yes • Q6 – Yes • Q7 – Yes • Q8 – Yes • Q11 – Yes • Q12 – No Comment • Q16 – Yes • Q16A – Yes • Q17 Yes • Q18 – No Comment • Q19 – Yes • Q20 – Yes • Q23 – Current Strategic Planning Team have little experience of waste planning therefore has not been able to answer the questionnaire fully. The Waste Promotions Team have been involved more with the WCS & all Bromsgrove's needs have been addressed through this.	17.12.08	Noted. Noted.

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0062.	363 – C	16.12.08	Dr David Gillett	Director/ Egbert H. Taylor & Co. Ltd.	Oak Park, Rylands Lane, Elmley Lovett, Droitwich, Worcestershire, WR9 0QZ	• Q1 – No
						• Q2 – Yes
						• Q3 – Yes
						• Q4 – No
						• Q4A
						  ○ Effective commercial recycling from regionally dispersed businesses needs to be included.
						  ○ Issues are, cost to recycle (not to recycle), collection efficiency & CO2 saving/loss from commercial recycling.
						• Q5 – Yes
						• Q5A – Is the County Council up to date on best practice containment/ collection systems; underground systems, Envac systems & the efficiency, labour, CO2, public image, safety & cost benefits they can bring if designed in up-front to regional spatial & regeneration strategies. See Report 'Recycling in UK Plc' attached to response
						• Q6 – Yes
						• Q7 – Yes
						• Q8 – Yes
						• Q9 – Yes
						• Q9A – True commercial waste arisings, not just that collected by municipal trade waste, but including all private contractors. Data on this area very poor unlike data for municipal waste, good plans require good data..
						• Q10 – Be sure to talk to the private sector contractors in assessing this.
						• Q11 – Yes
						• Q12 – No Comment
						• Q13 – No
						• Q13A – See answer to Q9A
						• Q14 – Yes – Take comments 9A into account. What about landfill tax the price movements of bulk recyclables as commodities e.g. The recent huge fall in prices.
							18.12.08	Noted.
								
								Noted.
								
								Noted.
								
								Noted.
								
								Noted.

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						• Q15 – No Comment
						• Q15A – Incineration must be considered – can generate power & often is the best option economically & C02 wise.
						• Q16 – No
						• Q16A – Yes – Major investment need a 25year plan – eg. Sheffield's PFI with Veolia.
						• Q17 – Yes
						• Q18 – No
						• Q19 – Yes
						• Q19A – If Birmingham grows more than expected how will this be incorporated? What sensitivity analyses will be conducted?
						• Q20 – Yes
						• Q21 – No
						• Q21A – should run a strategic assessment of technologies; cost, effectiveness, impact, suitability, acceptability & from this make recommendations. Don't leave this to the private sector.
						• Q22 – Yes
						• Q23
						  ○ Urge state of the art containment & collection systems to become part of the plan.
						  ○ If the point public/business interact with waste industry isn't correct, won't get what you need to feed treatment plants.
						  ○ Look at underground waste/recycling collection systems & envac systems.
						  ○ Look at communal waste/recycling sites in villages as in France.
						  ○ Look at strategies to sell this to the public (eg. specialists such as Envirocoms)
						  ○ Look at countywide or West Midland City Region wide bin colours, logo (WRAP logos), bin type & waste/recycling systems collected from business & home.
								Noted.
								Agreed.
								Noted.
								Noted, but government and regional advice both recognise the limited ability of LPAs to make these assessments.
								Noted.
								Noted.
								Agreed.
								Agreed.
								Agreed.
								Agreed.

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						○ Help educate SMEs to recycle more. ○ See 3 reports attached to response.		Agreed. Noted.
0063.		15.12.08	Martin Rose	Estates & Quarry Development Manager/ Wienerberger LTD	Rush Lane, Dosthill, Nr Tamworth, B77 1LT	• **Responded by e-mail** • Have two sites in Worcestershire – Waresley & Hartlebury, both have ongoing landfill activities. Have no more land to offer towards the WCS.	18.12.08	Noted.
0064.		16.12.08	Steven Bloomfield	Conservation Officer – Planning/ Worcestershire Wildlife Trust	Lower Smite Farm, Smite Hill, Hindlip, Worcester, WR3 8SZ	• Q1 – No • Q2 – Yes • Q3 – Yes • Q4 – Yes • Q5 – Yes • Q5A ○ Broad aspirations in the vision are appropriate to the county & would offer a sensitive driver for change. ○ Include paragraph tightening up commentary on revised locations & styles of waste management, would make a strong addition to the local focus of the vision statement. ○ Keen to see the vision 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 WCC. • Q6 – Yes – Pleased to be able to support the overriding objective concerning the protection & enhancement of the natural environment. Essential that this principle is at the heart of all waste management & planning decisions if the county is to achieve sustainable development. • Q7 – Yes • Q8 – Yes • Q9 – Yes	18.12.08	Noted. Noted.

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						• Q9A
						  ○ Monitor impact of waste developments on the local environment, any impact on biodiversity & green infrastructure.
						  ○ Monitor through planning application process & give relevant details from ecological surveys submitted with applications, decision notices & associated planning conditions.
						• Q10 – Yes
						• Q11 – Yes
						• Q12 – No
						• Q13 – Yes
						• Q14 – Yes
						• Q15 – Yes
						• Q16 – Yes
						• Q16A – Yes
						• Q17 – Yes
						• Q18 – Yes
						• Q18A
						  ○ Direct & cumulative impacts on the wider green infrastructure of the County: links between important habitat features & also deeper 'ecosystem' links eg. between river & floodplain.
						  ○ Important to recognise that all development can cause benefit or harm to wider ecological links in the County.
						  ○ Expect the WCS to augment rather than fragment local green infrastructure.
						• Q19 – Yes
						• Q20 – Yes
						• Q21 – Yes
						• Q22 – Yes
						• Q23 – No Comment
								Agreed.
								
								Agreed.
								
								Agreed.
								
								Agreed.

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0065.		16.12.08	Elizabeth Morgan		Berkley House, Woodbury Park, Norton, Worcester, WR5 2QU	• Q1 – Yes
						• Q1A – The possibility of waste brought from outside the county, mentioned further into the document should be specifically identified, specified & quantified as an additional waste stream.
						• Q2 – Yes
						• Q3 – No
						• Q3A – Quarries are a valuable potential source for future landfill. The council must be involved in quarry waste so the potential can be recognised.
						• Q4 – No
						• Q4A – Carbon Footprint issues, effects of climate change, best value in terms of overall economics, cost/benefit analysis in terms of overall issues & costs to the community.
						• Q5 – No
						• Q5A
						  ○ The vision is impossible to achieve, if this is flawed everything thereafter is flawed.
						  ○ Vision needs to be achievable ie. Aim to be in top quartile of waste authorities in terms of waste management, efficiency & cost benefit to the community.
						• Q6 – No – Be cost effective, communities to be protected from adverse effects of waste developments, all waste developments to have negative carbon footprints & no health risks to communities.
						• Q7 – No
						• Q7A – To specifically identify any planned imported waste.
						• Q8 – No / Don't know
						• Q8A – If it is intended to import waste from outside the county these targets maybe irrelevant.
						• Q9 – Yes
								Noted.
								Agreed.
								Noted.
								Noted.
								Noted.
								Noted.
								Noted.
								Noted.

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						• Q9A – Cost/benefit analysis involving all known aspects of/on behalf of the community, carbon footprint analysis. • Q10 – No • Q10A – In general answer to question would be yes. However all waste streams must be identified from points of origin to points of ultimate disposal & the locations of best overall cost benefit can therefore be identified & assessed, irrespective of borders for district/boroughs. • Q11 – No • Q11A – Due to the current economic climate these distributions are no longer correct. They are not relevant in terms of overall cost benefit. • Where is Kidderminster? & Bromsgrove & Redditch will have higher values in the current economic climate. • Q12 – Cost benefit, community health & welfare around new facilities, carbon footprint analysis, effects upon traffic. • Q13 – Yes • Q14 – No • Q14A – There must be a planned treatment gap for various sensible business reasons, it is pointless to rely merely on other figures. Plan for what can be justified not what others justify for the council. • Q15 – No • Q15A – The amount of land may vary considerably depending on type of processes intended. Plan the processes first then the necessary land take will be more finite. • Q16 – Yes • Q16A – No – Monitor annually then if a tendency to veer away from the planned results a review should be carried out. • Q17 – No		Noted. Noted, but this information does not exist at present. Noted. Agreed. Noted. Noted. Noted. Noted, but this information does not exist at present.

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						• Q17A – The council will not know how the country & the county will develop in 5 years due to the current economic climate, let alone 20-30 years. The latter period will be pure speculation & irrelevant. • Q18 – Yes • Q18A 1. To actually comply with your own & government procedures, guidelines, rules & policies – something which you fail to do now 2. Do not impose upon local communities 3. Be truthful – a current failing as a council cannot be trusted. 4. Undertake proper risk assessments & cost/benefit analyses. • Q19 – Yes • Q20 – No – The list is too simplified & inadequate. Some ignore common sense, commercial factors & have negative cost/value basis. Some dispute other fundamental waste development principles, such as the proximity principle. • Q21 – No • Q21A – Technologies should be stated & where they will be located ie. Transfer Stations, CMRFs, Incinerators, Autoclaves etc • Q22 – No • Q22A – Cannot be a strategy if only dealing with concepts. Fundamental criteria must be defined first & then additional optional preferred criteria must be added for each type of waste management process/method. • Q23 ○ How it fits in with the strategy agreement with Herefordshire. ○ How we will achieve best value for money in achieving this strategy & the aims of the strategy.		Noted, but this is a requirement of government policy. Noted. Noted. Noted, but government policy warns against being over prescriptive. Noted. Agreed. Noted.

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						○ How will we ensure that we comply with our own procedures, policies, guidance etc ○ Industry waste is double domestic waste so double the effort should be applied to industrial waste rather than domestic. ○ Address carbon footprint of further developments & make this a critical requirement that it is minimised & is negative before allowing any development to proceed. ○ Adopt an open & honest approach to the community ○ Encourage people to sort & reduce their own waste, be more proactive in reducing waste. ○ Comply with own policies & procedures.		Agreed. Agreed. Noted. Agreed. Agreed. Agreed.
0066.		16.12.08	Patrick Firminger	Partner/ Firmingers LLP	Lion House, Castle Street, Worcester, WR1 3AA	• Identical to response 0065.		Noted.
0067.		17.12.08	Nick Roberts on behalf of Ian Barber (Mercia)	Director/ Axis	Cameilia House, 76 Water Lane, Wilmslow, Cheshire, SK9 5BB Mercia Waste Management, The Marina, Kings Road, Evesham, Worcestershire, WR11 3XZ	• Questionnaire & general response sheet returned. • Q1 – No • Q2 – Yes - The WCS should make a statement to this effect. • Q3 – Yes – The WCS should make a statement to this effect. • Q4 – No • Q4A – Too much detail about what might & might not be appropriate or important in dealing with waste. Surely this is the job of the strategy. 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.	22.12.08	Noted. Noted. Agreed.

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						• Q5 – No
						• Q5B
						  ○ The vision should be revised as follows: *"Our goal is that by 2027 very little waste will be produced in Worcestershire, & that facilities & 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"*
						  ○ 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 & 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 & the sort of facility required
						  • Proximity to arising.
						  • The usual spatial & environmental constraints.
								Noted.

						• Q6 – No – Concerns over the guiding principles:
						  ○ To adopt a precautionary approach – This seems a little vague, & requires definition. It could be construed as saying 'we will not act boldly or positively as required'. Waste is a serious & urgent issue. We think a little more dynamism is warranted. Expedient decision-making is now absolutely fundamental to delivering sustainable waste management in the UK.
						  ○ To involve all those who are affected. Requires definition &/substantiation. The phase should be 'to consult openly with all stakeholder & interested parties.'
								Noted.
								
								Noted.

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						○ To develop a network…. for Worcs… i.e. local self sufficiency). Disregards the JMWMS with Herefordshire, consideration of sub-regional issues, PPS10 & its companion guide. With regard to the latter, it is important to recognise that C&I waste does not recognise administrative boundaries & that the PPS10 companion guide (para 6.46\) indicates that authorities should not restrict the movement of waste across borders where this would meet other objectives. ○ To reduce the transportation of waste by road (i.e. proximity principle). The proximity principle no longer exists is English Waste planning/ strategy & 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.* Pure proximity is outdated & matters such as practicability, viability & sustainability are more important. 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. Furthermore statements about reducing transportation by road imply consideration of alternative modes. The strategy has to note that there are real limitations to this prospect. For instance, 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).		Agreed. Noted.

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						○ Reflect the concerns & interests of local people & businesses. What does this mean? How? Please give examples. ○ To make it as easy as possible … to develop waste management facilities … Please expand, give examples. **Draft Local Objectives** ○ Concerned with the concept of 'locally distinctive facilities.' Please clarify. Are household waste sites to be located & designed with respect to local distinctiveness? If so, how? What does a distinctive composting site look like? On facilities such as those referenced, if there is an issue of design, it can be addressed through normal development control process. There is no need to encumber the WCS with statements of this type. • Q7 – Yes • Q8 – Yes • Q9 – Yes • Q9A – Apart from monitoring waste arisings, recycling statistics etc. there should be periodic (annual?) review of the number of permissions granted & implemented, & the annual permitted capacity to deal with the waste arisings recorder. This information is available from LPA & EA records. • Q10 – No		Noted. Noted. Noted. Agreed.

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						• Q10A – C&I and C&D waste facility distribution cannot be made solely on a District & Borough Council area basis. For example, waste treatment facilities (as opposed to recycling facilities) cost many £ millions & will undoubtedly only be developed on a sub-regional basis (e.g.) C&I, EfW or Anaerobic Digestion for catering waste). Furthermore, C&I/C&D waste movement will be subject to market forces/economies of scale/transport costs etc. Given the small geographical scale of individual Districts/Boroughs, administrative boundaries will be meaningless for these waste streams. The WCS should allocate facilities across all Districts/ Borough, but focus on larger facilities in areas of the main waste arisings proximate to the main transport routes. There is no harm in over allocation for recycling, recovery etc. as the market will only bring forward development when it is economically expedient to do so. Under provision will stifle sustainable waste management. • Q11 – No • Q11A – The approach is wholly over prescriptive & will stifle development rather than facilitating it – see response to Q10A. Not – PPS10 Companion Guide (para 6.46) indicates authorities not to restrict the movement of waste across borders where this would meet other objectives. • Q12 – Apart from monitoring the waste arisings, recycling statistics etc. there should be periodic (annual?) review of the number of permissions granted & implemented, & the annual permitted capacity to deal with the waste arisings recorded. This information is available from LPA & EA records. • Q13 – Yes • Q14 – No		Noted. Noted. Agreed.

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						• Q14A – Agrees that estimating the treatment gap should be based upon actual capacity & landfill diversion targets. However the objective is not to meet landfill diversion targets but to move up the waste hierarchy. Therefore the WCS should over plan (beyond diversion targets) for recycling & recovery, but must also plan for sufficient landfill should the recycling & recovery targets not be met.. There is no harm in over allocation of recycling, recovery etc. as the market will only bring forward development when it is economically expedient to do so; under provision will stifle sustainable waste management. • Q15 – No • Q15A – The ratios are broadly ok except for landfill, which are meaningless. Landfill can only be planned for, by identifying specific sites (noting that very few landfills will be required). The sites should be identified by a 'call for prospective sites' from industry. Proposals should then come forward for specific site evaluation by the Council. • Q16 – Yes • Q16A - No Comment • Q17 – Yes • Q18 – Yes • Q18A – Consideration should also be given to: o Infrastructure capacity (e.g. sewer capacity). o Potential co-location of waste facilities & the benefits that may arise from this. o Proximity to synergistic concerns (e.g. power &/or heat off-take users, or recyclables re-processors). • Q19 – Yes • Q20 – No		Agreed. Noted. Noted – to be discussed with Water Treatment Agencies.

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						• Q20A – The options appear generally sensible & in accordance with the thrust of national policy they do not take full account of the types of waste & particularly the full range of waste facilities that are required. • References to BPEO need to be played down as the JMWMS is under review & thus needs to be monitored as to whether BPEO will still form a component of the 'assessment' of the reviewed strategy. • Q21 – No • Q21A – Generally agrees with the Council's position, Qu 21/21A does not appear consistent with the text under the question box on pg54. For the avoidance of doubt specific technologies should be identified; o Their application or use (e.g. is it a facility for public use, or is it treatment, or is it disposal); o Their viability/deliverability (i.e. no point in saying pyrolysis or gasification are presently available when they are not – we are not aware of a single commercial pyrolysis plant treating mixed biodegradable waste any where in the world); o What waste stream they can manage (e.g. anaerobic digestion just treats organic food wastes &); o Experience of their application within the UK (e.g. incineration becoming widespread & a proven, viable technology); o Generic locational requirements (e.g. open windrow composting needing to be predominantly rurally based with bioaerosol buffer/mitigation requirements, whereas most built facilities are probably best located on B1, B2 or B8 land);		Noted. Agreed. Noted. Noted.

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						○ Their scale, application or catchment (e.g. Household Waste Sites are local facilities & should be developed on a single conurbation basis, whereas an EfW costing £100million is more likely to be developed on a county or sub-regional basis)		
						• The Council does not need to specify which technologies should be developed, but is providing clear information on what the expectancy should be in terms of the types, numbers & general location of future waste management facilities.		Agreed.
						• Q22 – No		
						• Q22A – Supports the general approach, but example in Q22 are not particularly helpful & is recommended that the approach suggested in Q21A is adopted.		Noted.
						• Q23 – No Comment		
						General Response to Part 2 (Pages 8-19)		
						• WCS makes reference to too many targets. As the WCS cannot address the multiplicity of targets, it should rationalise & focus on one set of objectives, which are mandatory, realistic & achievable.		Agreed.
						• 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. This is consistent with thinking at national level.		Agreed.

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						General Response to Part 2 (Page 21) • The text at foot of page 21 is without context or substance & is factually incorrect. Makes no meaningful contribution to the document & should not be a message carried through the WCS. 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.* **General Response to Part 3 (Page 22-24)** • *What issues do we need to consider…?* The current text & reliance on the draft spatial portrait does not appear to provide a clear concise strategy. WCS 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' (and the whole strategy) could be simplified: a) The geography of Worcs, & 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).		Noted. Noted. Noted.

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						c) Targets & policy objectives. d) Broad types & number of facilities required e) Discrete locational criteria for each type of facility. f) Provision for managing change i.e. the impacts of changing waste volumes & composition. **General Response to Part 5 (Page 38)** • We disagree that the Joint Municipal Waste Strategy is the appropriate document in which to address the spatial planning of municipal waste facilities. It should be driven by the Waste Development Framework, Worcestershire WCS should provide broad locational guidance for sub-regional facilities (i.e.' for Herefordshire & Worcestershire). • 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). • **General Response to Part 6 (Pages 50-53)** • The BPEO targets (Criteria Option) 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 (Defra & dBERR respectively), 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.		Noted. Noted. Noted.
0068.		17.12.08	Comments from the general public in Norton			• **Responded with table of comments** • Response refers to the Waste Core Strategy Regulation 28 Submission Document & Proposals Map, which has been withdrawn on the direction of the Secretary of State & is no longer relevant to the preparation of the WCS.	22.12.08	Noted.

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0069.		17.12.08	Mr Brian Jordan		21 Beauchamp Avenue, Kidderminster, Worcestershire, DY11 7AG	• Response received by letter • Doesn't think a tick box questionnaire is adequate to deal with such a complex issue. Felt like being led down a pre-determined path that would lead to MSW being thermal treated (incinerated) & the management of waste being profit driven. • These views are reinforced by reports on the Hartlebury Incinerator. • Believes that not enough emphasis on waste minimisation. The producer of waste needs to be responsible for disposal, referring to excess & cosmetic packaging. Waste minimisation can be achieved through lifestyle education e.g. Not using disposable nappies. • Q5 – By agreeing with the vision means agreeing with incineration. For one to agree or disagree would need to have details of technology involved & types of waste being burnt. • Q20 – Question has 5 components but only requires one answer. • Within the strategy are several references to docs on WCC & other government websites. This does not give a fair opportunity to understand the details of what is being proposed. Consultation needs to be more definitive & direct.	22.12.08	Noted. Agreed. Noted, disagree. Noted. Noted.
0070.		17.12.08	Martin Kenrick	Leader of Working Group set up by Chaddesley Corbett Parish Council	September House, Woodrow, Chaddesley Corbett, Worcestershire, DY10 4QE	• Q1 – Don't know • Q2 – No • Q2A – Nobody should be free to dump waste as they please. If farmers sell their manure we need to know what it contains, who controls the pesticides that leech into the soils & rivers. • Q3 – No • Q3A – If there are measures that can include minerals then do so or it leaves a loophole. • Q4 – Don't know • Q4A – Could not find the Draft Spatial Portrait	22.12.08	Agreed, but this is principally the role of the Environment Agency and EHOs, not the Core Strategy. Noted. Noted.

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						• Q5 – No • Q5A – Far too long & includes delivery which belongs elsewhere. Suggest using para 2. pg 29 'it will be a change …' as a basis for a revised statement. People need to be able to identify with & remember the vision easily. • Q6 – Yes so long as there is no reference to developing on green belt. • Q7 – No • Q7A – Agree to exclude radioactive waste although it needs dealing with if generated. Feels ignoring agricultural & mining waste creates loopholes. • Q8 – No • Q8A – The only target should be to reduce landfill to nil, meaning reducing facilities or stop waste being produced initially. • Q9 – Yes • Q9A – Monitor reduction to NIL. Success will be obvious. • Q10 – No • Q10A – They have to go where they will be most effective. An arbitrary allocation makes no sense. • Q11 – No • Q11A – See Q10. This is an arbitrary allocation. New developments have to be allowed where they will be most effective. • Q12 – Achieving a figure, constantly reducing until it reached nil. • Q13 – No • Q13A – Need to know what waste is produced before treatment, as we need to address/ discourage fly tipping. • Q14 – No • Q14A – Little point in using unreliable figures. Capacity required is that, that will result in nil waste to landfill.		Noted. Noted. Noted. Noted. Noted. Noted. Noted. Noted. Noted.

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						• Q15 – Don't know • Q15A – What about figures for recycling? Incineration etc, are they not part of the mix? • Q16 – Yes • Q16A – Yes but always with the objective of reducing to nil. • Q17 – No • Q17A – The dates are being increasingly stretched. As waste generation decreases & nil approaches, so the need for new facilities should reduce & eventually disappear. • Q18 – Yes • Q18A – Absolutely no encroachment onto the green belt. • Q19 – Yes • Q19A – Population Growth, Immigration Growth, Shifting Population. • Q20 – No • Q20A – Never appropriate in the Green Belt. Location will depend on who is funding the operation. A private contractor will go where he can make a return. • Q21 – Yes but it should specify least environmental impact in terms of air, noise & visual pollution. • Q22 – Yes, probably but make landfill a last resort & that 'indoors' should have no desirable emissions. Where does recycling fit into this? • Q23 ○ Vision needs to be short, punchy & rigid. The strategy to deliver the vision is separate & reviewed regularly. The mission statement needs to be "popularised" so that local population become very aware of Worcs ambitions in this area.		Noted. Noted. Agreed. Noted. Agreed. Noted. Noted. Agreed. Noted. Noted.

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						○ Overall objective must be NIL waste produced &, if not possible, then NIL into landfill. ○ Not always clear if discussing about landfill or other ways of treating waste. If all waste could be recycled then amount produced would be irrelevant as there would always be commercial opportunities for someone. ○ Targets in report are irrelevant only NIL should be used. ○ Zero landfill objectives need to be promoted locally so local population engages with the process e.g. poster campaign. ○ Need to know what waste is produced. ○ Make it easier for everyone to recycle. ○ Education/ help is needed to reduce waste production ○ Different types of waste require different sets of rules. ○ Economic downturn should provide opportunity to secure existing large premises for use as transfer station at reduced cost. Transfer stations will be vital to increase the recycling potential in this area. ○ Suggest lobbying current contract holders to ensure they are delivering best practice, rather than delivering the least as outlined by an outdated contract.		

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0071.	601 – E (S)	17.12.08	Mrs A Halford	Parish Clerk/ Kempsey Parish Council	Parish Office, Community Centre, Main Road, Kempsey, Worcester, WR5 3LQ	• Q1 – No • Q2 – Yes • Q3 – Yes • Q4 – No • Q4A – There is insufficient clarity on how waste collection will be done in rural areas & on size/frequency of vehicles used for collection. • Q5 – No • Q5A – Generally good but leaves open the question of the needs of rural areas. • Q6 – Yes • Q7 – Yes • Q8 – Yes • Q9 – No • Q10 – Yes • Q11 – Yes • Q12 – No Comment • Q13 – Don't know • Q14 – Don't know • Q15 – Yes • Q16 – Yes • Q16A – Yes • Q17 – Yes • Q18 – Yes • Q18A – Traffic on County roads, Weight & Volume. • Q19 - Yes • Q20 – Yes • Q21 – Yes • Q22 – Yes • Q23 – No Comment	22.12.08	Noted. Noted.

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0072.		17.12.08	A F Williams		10 Galahad Way, Stourport on Severn, Worcestershire, DY13 8SQ	• **Respondent not prepared to answer the formatted questions, as they feel the format inhibits free expression. Has responded by letter with their own comments**	23.12.08	Noted.
						• BPEO should be reappraised to ensure all parameters & objectives are taken into account when establishing the final methodology for disposal & designs of facilities.		Noted.
						• Empirical data & estimates should not be used for establishing the scale of facilities needed. Individual breakdown of waste type & quantities for each collection area should be used.		Noted.
						• PFI should be withdrawn, thus avoiding unnecessary waste production, which leads to global warming.		Noted.
						• Waste Strategy 2000 patronises the community sector & ignores expertise. Focus lies with industry to provide equipment which in the economic downturn exacerbates the depletion of reserves, increases pollution from manufacturing & increases greenhouse gases.		Noted, but it is government policy.
						• Capital Investment for any waste disposal strategy should be provided by the government		Noted.
						• Incineration does not provide an acceptable or long term solution to problems. Has been inadequate analysis on effects both emotively & health.		Noted.
						• The production of waste should be the responsibility of the producer (generally the supplier) of the packaging, i.e. the container, which the product is sold in. Excessive cosmetic packaging should be disposed of through the reverse of purchase route (Producer Responsibility – EEC directive – see addendum).		Agreed.
						• Variable charging for disposal should be introduced thus providing an incentive for suppliers, particularly fast food outlets, householders & prevent fly tipping.		Noted.

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						• 'Recycling' is used colloquially & always implies re-use. Should be more specific & separated from 'Energy from Waste' particularly in conjunction with 'Mass Burn Incineration'. Zero waste should be the main objective. Reduced emissions would be achieved if potentially hazardous emissions were avoided from incineration & landfill.		Noted.
						• A higher percentage (above 75%) of waste recovered & composted can be achieved. Focus & action on producer responsibility should be intensified, not the purchasers of inappropriate waste. This would reduce the expensive projects & contentious disposal methods for commercial reasons.		Noted.
						• The draft vision is acceptable. Does not agree with actual question, it is far too broad reaching. In particular 'Energy should be recovered from wastes where possible' is disputed & contentious. It is far to complex a subject in such a simple phrase, problem must be measured accurately before any strategy can be agreed. Capital investment based upon estimates will not produce satisfactory solutions.		Noted.
						• Q21 is based upon acceptance of a negative answer & is uninformative for the previous reasons given.		Noted.
						• Public participation time appears to be the role of public education rather than full enlightenment of the situation for all measured facts & alternatives. Particularly incineration is not detailed, this inevitably leads to the current situation of emotive rumours.		Noted.
						• Believes it is patronising if the community is not given sufficient opportunity to comment on such potentially life changing proposals.		Noted.

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						• Believes the revised WCS process has been ineffective in informing the public of the ongoing process & revised opportunities for consultation. The 'advert' in Wow was inadequate & the consultation period was not long enough for people to study, research & reply. Wow was delivered late November with a free newspaper, an unreliable source of delivery.		Noted, but the consultation was advertised in every newspaper in the County and over 1,000 letters sent out.
0073.	634 – E (S)	17.12.08	Mrs Anne Dobbins	Town Clerk/ Pershore Town Council	Town Hall, 34 High Street, Pershore, Worcestershire, WR10 1DF	• Q1 – Yes • Q1A – Despite consultation notes on p19 there is no question 3 concerning planning issues for hazardous waste. Although the Council may not be actively seeking such applications planning policy for hazardous waste allocations should be adopted. The planning criteria should be properly adopted before the event of application. • Q2 – No • Q2A – Policies should aim to minimise & progressively reduce the production of greenhouse gases, including methane, also to minimize watercourse & groundwater contamination. • Q3 – Yes • Q4 – No • Q4A – Air pollution (e.g. incineration) airborne nuisance, (e.g. odours, dust, flies) & vermin infestation. HGV impact on road system & communities, & how to minimize fossil fuel usage & CO2 emissions. Impact on residential environment & amenities. • Q5 – No Comment	23.12.08	Agreed. Noted. Noted.

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						• Q5A & Q5B ○ 'very little waste produced in Worcestershire' is a very worthy vision but does not take account of the overall effectiveness of waste minimisation policy. Sorted waste leaving the county to be dealt with elsewhere is still arising in Worcestershire. Minimising of this waste should be part of the vision. ○ A waste/recycling vision should take account of demand for recycled materials. Stockpiling of sorted waste & excessive production of low grade recycled paper & plastic materials for which there is in sufficient use/demand should not be counted as successful recycling. ○ The strategy should commit to monitoring the progress of the National Waste Strategy in respect of manufacturers & retailing targets. And to apply timely pressure at government level if failures to meet targets in these areas of activity impose an unreasonable burden on the Authority. • Q6 – No Comment – p33. For the most important guiding principle see Q23 • Q7 – Yes • Q8 – Yes • Q9 – No • Q10 – Don't know Q10A – Difficult to see how this is workable due to movement of material across boundaries as imports/exports from/to areas outside Worcestershire. Alternative locations could be decided based on accessibility & transport distances & nuisances.		Noted. Noted. Noted. Noted.

Response Reference Number	Consultation Number	Date Received	Name	Job Title/Organisation	Address	Summary of Points Made	Response Acknowledged?	Council's Initial Response
						• Q11 – Don't know • Q12 – Success of National Waste Strategy Targets as per Q5. • Q13 – Don't know • Q14 – Don't know • Q15 – Don't know • Q16 – Yes • Q16A – Yes • Q17 Don't know • Q18 – Yes • Q18A – Traffic movements for access to be only on designated HGV routes. • Q19 – Yes • Q20 –Yes • Q21 – Yes • Q22 – Don't know • Q23 – Caveat to 'Most Important' guiding principle p33. Add 'and visitors to the County'. At the same time ensuring that its waste handling & processing arrangements do not knowingly cause harm to the environment or to the welfare of the people elsewhere. There should not be the attitude that once waste is despatched over the counties boundary it is no longer the authorities problem. The caveat should also inform decisions, e.g. on incineration, materials reclamation & refining & processing hazardous waste.		Agreed. Noted. Noted.
0074.		17.12.08	Rachael Bust	Deputy Head of Planning & Local Authority Liaison/ The Coal Authority	200 Lichfield Lane, Merry Hill, Mansfield, Nottinghamshire, NG18 4RG	• **Responded by letter**. • The Coal Authority has no specific comments to make on the document at this stage.	23.12.08	Noted.

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0075.		18.12.08	Mr Peter Yates	Planning Policy Manager / Herefordshire Council	Plough Lane, PO BOX 4, Hereford, HR1 2YH	• Q1 – No
						• Q2 – Yes
						• Q3 – Yes
						• Q4 – No
						• Q4A – p24 Alternative Scenarios & preferred options should also include reference to climate change (see Planning Act 2008, Section 182)
						• Q5 – No Comment
						• Q5A – The location for new facilities in the statement will need updating as new permissions are granted e.g. Hartlebury in Wychavon.
						• Q6 – Yes
						• Q7 – Yes
						• Q8 – Yes
						• Q9 – Yes
						• Q9A -
						  ○ Waste treated (tonnage)
						  ○ Waste miles travelled
						  ○ Split between waste re-used, recycled, landfilled etc.
						• Q10 – Don't know
						• Q11 – Don't know
						• Q12 – No Comment
						• Q13 – Yes
						• Q14 – Yes
						• Q15 – No
						• Q15A – Different technologies have different requirements & this will affect the ratios. By 2026 there may be new & different technologies available also.
						• Q16 – Yes
						• Q16A – Yes but 5-year review should be in connection with JMWMS & Herefordshire are made aware of these 5 yearly reviews.
							23.12.08	Agreed.
								
								Agreed.
								
								Noted.
								
								Noted.
								
								Agreed.

Response Reference Number	Consultation Number	Date Received	Name	Job Title/Organisation	Address	Summary of Points Made	Response Acknowledged?	Council's Initial Response
						• Q17 – Don't know • Q17A – There is sufficient time between now & 2026 to sort this out. • Q18 – Yes • Q18A – Joint-working arrangements with Herefordshire Council. • Q19 – Yes • Q19A – Add RSS Phase 2 – as new development proposals will have an impact on waste management capacity & the JMWMS. • Q20 – Yes • Q21 – Yes but needs to be aware of waste management technologies. • Q22 – Yes • Q23 – Be aware of the ERM Study on 'Residual Options Appraisal' (October 2008).		Noted. Agreed. Agreed. Noted. Noted.
0076.	1444 – W	18.12.08	Peter Morgan		Berkley House, Woodbury Park, Norton, Worcester, Worcestershire WR5 2QU	• Identical to response 0065	23.12.08	
0077.		18.12.08	Paul Burton	UK Operations Manager/ Joy Mining Machinery Ltd	Worcester Operations, Bromyard Road, Worcester, WR2 5EG	• Q1 – No • Q2 – Don't know • Q2A – This issue is not applicable to our industrial site • Q3 – Don't know • Q4 – Yes • Q5 – Yes • Q5A – Strongly support the vision. • Q6 – Yes • Q7 – Yes • Q8 – Yes • Q9 – No	23.12.08	Noted. Noted.

Response Reference Number	Consultation Number	Date Received	Name	Job Title/Organisation	Address	Summary of Points Made	Response Acknowledged?	Council's Initial Response
						• Q10 – Yes • Q11 – Yes • Q12 – None that we are aware of. • Q13 – Yes • Q14 – Don't know • Q15 – Yes • Q16 – Yes • Q16A – Yes • Q17 – Yes • Q18 – No • Q19 – Yes • Q20 – Yes • Q21 – Yes • Q22 – Yes • Q23 – Joy Mining Machinery are in the process of obtaining ISO14001 accreditation & would suggest that the County Council encourage other organisations to follow this path.		Noted. Agreed.
0078.	818 – L	18.12.08	V Kendrick	CPRE (Redditch Group	105 Enfield Road, Hunt End, Redditch, Worcestershire, B97 5NE	• Q1 – No • Q2 – Yes • Q3 – Yes • Q4 – No Comment • Q5 – Don't know • Q6 – Yes • Q7 – Yes • Q8 – Don't know • Q9 – Don't know • Q10 Don't know • Q11, 12, 13, 14, 18, 20 - No Comment • Q15 – Yes • Q16 – Yes • Q16A – Yes • Q17 – Don't know • Q19 – Yes • Q21 – Don't know	23.12.08	Noted.

Response Reference Number	Consultation Number	Date Received	Name	Job Title/Organisation	Address	Summary of Points Made	Response Acknowledged?	Council's Initial Response
						• Q22 – Yes • Q23 ○ Apologises for no experience as a waste as a possible resource but the concept is good ○ Do full & mixed waste skips from households, building sites & business premises get sorted/recycled? Not everyone uses the tip! ○ Restrictions on tip use at district boundaries do not make sense. Studley is nearer to Redditch that Stratford. There should be no competition or excessive costs to transport waste. ○ All reuse able waste should be marketed as with (some) recycled materials. ○ Much 'packaging' still requires depositaries – polythene, polystyrene, toys & large plastic bags ○ Will rag & bone collectors be included in WCS, will their locations be part of the picture? There are 3 in this area. ○ Page 15/16 Woodland & Green Wood Waste Forestry. ○ Much could be used from households – green waste into compost/soil improvers. Worcestershire does not collect. Stratford does. Why can't it work within all counties? ○ Scrap cars? Anything included about them?		Noted. Noted. Noted. Noted. Agreed. Noted. Noted. Noted. Noted.
0079.		18.12.08	Yvonne L Scriven	Clerk / Chaddesley Corbett Parish Council	Urioxhey House, Elmbridge, Nr Droitwich, Worcestershire, WR9 0NQ	• Q1 – No • Q2 – Yes • Q3 – Yes • Q4 – Yes • Q5 – Yes	23.12.08	

Response Reference Number	Consultation Number	Date Received	Name	Job Title/Organisation	Address	Summary of Points Made	Response Acknowledged?	Council's Initial Response
						• Q6 – Yes • Q7 – Yes • Q8 – Yes • Q9 – Don't know • Q10 – Yes • Q11 – Yes • Q12 – No Comment • Q13 – Yes • Q14 – Yes • Q15 – Yes • Q16 – Yes • Q16A – No Comment • Q17 – Yes • Q18 – No • Q19 – Yes • Q20 – No • Q20A – Waste facilities development is totally inappropriate in rural locations • Q21 – Yes • Q22 – Yes • Q23 – A pity the WCS does not put pressure on manufacturers/ distributors to reduce the amount of packaging used. Modern packaging is large, unnecessary, clogs up landfill & consumes natural resources. Pressure should be put on local manufacturers/distributors.		Noted, disagree. This would not be in accordance with |Government policy. Agree.
0080.		18.12.08	Amy Knight			• Identical to Response 0065	6.1.09	
0081.		18.12.08	Hilary Berry	Environment Agency		• **Responded by e-mail** • General Comments – Does not have the resources in time available to verify figures. An in-house or independent specialist auditor should be considered, to verify that the figures add up, are robust & 'look right' with no glaring errors. This would make a more robust evidence base. Contact EA in the New Year to discuss their input.	6.1.09	Noted.

Response Reference Number	Consultation Number	Date Received	Name	Job Title/Organisation	Address	Summary of Points Made	Response Acknowledged?	Council's Initial Response
						• Little reference to England Waste Strategy, the overturning of waste hierarchy & decoupling waste from the economy. Check that the document ticks these strategic boxes. The document does very little to promote waste as a resource. • Page 9 – More up to date data has been released. The plan should consider the most relevant data set available & national & local trends in waste, perhaps using comparable counties to benchmark against? The EA is working to improve the evidence base on waste data. • Page 12 – An observation on our role to provide data. Most C&I will come from returns for materials delivered to the permitted waste management sites. Waste producers are not required to routinely send us data except in specific circumstances (e.g. Where the waste is hazardous). We are aware in gaps in the data (e.g. waste to exempt sites) & surveys are used to generate information on overall production, but these are expensive. • Page 18 – Hazardous Waste should not be mixed but segregated. Management of clinical waste is a specific issue; can contain pathogenic & chemical hazards. You may wish to consult NHS Trusts for the County that they have identified provision for adequate disposal & treatment. • Glossary – need to mention EPR (Environmental permitting regime) & WML (Waste management Licensing) & PPC (Pollution Prevention Control). • Q1 – Yes o Apart from the Herefordshire Factor we cannot see where the WCC considers net imports or exports of waste & if this creates any significant distortion? E.g. where controls are tightened on what is accepted at household waste sites, people may take their waste to a different site where there is less checking, or it may get fly tipped.		Noted. Noted. Noted. Agreed. Agreed Noted.

Response Reference Number	Consultation Number	Date Received	Name	Job Title/Organisation	Address	Summary of Points Made	Response Acknowledged?	Council's Initial Response
						○ Clinical waste treatment (see above) should be a waste stream. ○ Waste produced from flooding clear ups? This is understandably very mixed, produced infrequently but may be in large quantities. Should include in WCC, emergency plans to identify temporary capacity for sorting & recovery of flood-related wastes. ○ A proportion of waste maybe diverted to illegal outlets, for example fly tipping, illegal sites, unauthorised reprocessing activities or even exported. EA don't ask illegal operators to keep records even if they would send information voluntarily, but some estimates can be obtained from fly capture data & perhaps assessing the scale of illegal activity that comes to our attention. EA seeking to reduce the number of illegal sites. WCC may want to assess if illegal disposal activities are a significant distorting factor. • Q3 – Yes: Trying to manage waste holistically as a resource & then discounting elements seems illogical. Mineral wastes (will usually) be inorganic in nature, like construction 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. • Q4 – Yes (see paragraphs 4-6 in WCC) • Q5 ○ More emphasis on opportunities to utilise resources, not on the term 'waste'. This is a culture change process. ○ Waste sites should be in sustainable locations, low flood risk areas (see PPS25 & sequential test & exception test), & with no adverse risks from contamination.		Agreed. Agreed. Noted. Agreed. Noted. Agreed.

Response Reference Number	Consultation Number	Date Received	Name	Job Title/Organisation	Address	Summary of Points Made	Response Acknowledged?	Council's Initial Response
						• Q6 – Yes • Q7 – Yes • Q8 – A risk matrix on your numerical model & identification of the issues that influence the figures would assist in answering the question • Q9 – Don't know • Q10 – Don't know • Q11 – Don't know – Note: Table D2 of PPS25 shows the different flood risk vulnerability classifications for different type of waste activity/ processes & table D3 gives compatibility of flood risk with the flood zones • Q12 – Don't know • Q13 o 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. The skip waste sector may often run close to flat out, may be due to the demand for skips, lack of capacity & competition, this creates opportunities for illegal activity. It is uneconomic for waste sites to be idle, household waste will often operate 362 day opening. Closing or altering opening hours of household waste needs to be planned & done carefully to avoid consequences of people being unable to dispose of waste. o Some EA capacity calculations are based on 'Bands' in the environmental permitting charging regime & may not be accurate. • Q14 – Yes • Q15 – Don't know		Noted. Agreed Noted. Agreed.

Response Reference Number	Consultation Number	Date Received	Name	Job Title/Organisation	Address	Summary of Points Made	Response Acknowledged?	Council's Initial Response
						• Q16 – Yes • Q17 – Yes • Q18 – Yes: Once facilities are established, there should be strong presumption against subsequent encroaching development, especially houses or other safeguards to prevent amenity impact from approved developments & consequent retrospective opposition. • Q19A – The SFRA, The River Trent Catchment Flood Management Plan. Future Issues: Changes to the tax & regulatory regimes may have impacts. New Draft EC Waste Framework. • Q20 – Yes: Generally with room for flexibility & unique circumstances. For instance, large landfills will probably have to be in rural locations. • Q21A – waste reduction is a waste management technique not listed. Can any planning benchmarks or limits be set on commercial developments to keep residual waste production at or below a set level? (-Similar to limiting hours of working or other constraints?) How about requiring commercial or industrial developments to embed waste minimisation strategies or occupiers?		Agreed. Agreed. Agreed. Will be explored.
0082.		18.12.08	Martin Hardy	Bredon Parish Councillor	Hula Hale, Oak Gardens, Bredon, GL20 7LS	• Q1 – No • Q2 – Don't know • Q3 – Yes • Q4 – Yes • Q5 – Yes • Q6 – Yes • Q7 – Yes • Q7A – Who deals with radioactive waste? Is it dealt with outside the County? • Q8 – Yes • Q9 – Don't know • Q10 – Yes		Noted.

Response Reference Number	Consultation Number	Date Received	Name	Job Title/Organisation	Address	Summary of Points Made	Response Acknowledged?	Council's Initial Response
						• Q11 – Yes • Q12 – No comment • Q13 – Yes • Q14 – Yes • Q15 – Yes • Q16 – Yes • Q16A – No, review it every 3 years, 5 years is too long • Q17 – Yes • Q18 – No • Q19 - Yes • Q20 – Yes • Q21 – Yes • Q22 – Yes • Q23 – No comment		
0083.	1077 – F (S)	18.12.08	Andrew Ford	Acting Policy Manager/ Wychavon District Council	Civic Centre, Queen Elizabeth Drive, Pershore, Worcestershire, WR10 1PT	• Q1 – No • Q2 - Yes • Q3 – Yes • Q4 – Yes • Q5 – Yes: But take account of development identified in the SWJCS. Needs to reflect emerging JMWMS & invest research by the County Council. • Clarification sought on reduction of waste facilities suggested in Evesham & Pershore. Issue of sustainable travel & potential problems if neighbouring waste authorities prevent cross boundary waste movements. • Q6 – Yes • Q7 – No • Q7A – Ref. Should be given to 'organic waste' & 'food waste 'to accord with strategies being developed at a district level. Ref. Could be made to role off bio fuels & associated composting plants.	6.1.09	Agreed Agreed/ Noted.

Response Reference Number	Consultation Number	Date Received	Name	Job Title/Organisation	Address	Summary of Points Made	Response Acknowledged?	Council's Initial Response
						• Q8 - Yes • Q9 – Yes • Q9A – Indicators that show waste management is being self-contained within the county. Need to back specialist facilities operate on a UK wide basis with implications for transfer? • Q10 – Yes but need to back opportunities for commercial waste recovery e.g. for 'autoclave' plant at Hartlebury Trading Estate. • Q11 – Yes • Q12 – No Comment • Q13 – Don't know • Q14 – Don't know • Q15 – Yes • Q16 – Yes • Q16A – Yes • Q17 – Yes • Q18 Yes, but given recent experience at Norton regard should be given to transport. Not only of waste material, but also staff & associated sustainability issues. • Q20 – Yes • Q21 – Yes • Q22 – Don't know – question is unclear. • Q23 – Concern that the research & emerging JMWMS does not appear to have informed preparation of the refreshed report. Should be taken into account moving towards pre-submission WCS.		Noted. Agreed. Agreed. Agreed.
0084.		18.12.08	David Goggin			• Identical to Response 0065	6.1.09	
0085.		18.12.08	Chris Morag		22 The Hidage, Littleworth, WR5 2QG	• Q1 – Yes • Q1A – More detail regarding waste brought from outside the county. • Q2 – Yes	6.1.09	Agreed.

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						• Q3 – No: Quarry sites are ideal for future landfill & should be part of waste solution programmes.		Noted.
						• Q4 – No		
						• Q4A – Carbon Footprint, Effect on Climate Change, Best value in terms of overall economics, Compensation for those affected, Reward for loss of amenity for those most affected.		Noted.
						• Q5 – No		
						• Q5B – The strategy is an imposition, which local people have little influence on – the contribution made by the few for the rest in this idealistic dream should be recognised & rewarded because their sacrifice is forced upon them. Cut waste at the source – it's your life, your future & your pocket!		Noted.
						• Q6 – No – Doing your bit, protection, compensation & reward for communities affected.		Noted.
						• Q7 – No		
						• Q7A – If a living document then nothing should be excluded – its existence needs to be recognised & its potential handling catered for – after all it passes through the county already by rail		Noted.
						• Q8 – No		
						• Q8A – Not if everyone is providing waste facilities for their own waste arisings across the county with their own waste core strategies, otherwise we might as well not bother with a programme for reduction & re-use.		Agreed.
						• Q9 – Yes		
						• Q9A – Cost Benefit Analysis, Carbon Footprint Analysis.		Noted.
						• Q10 – No		
						• Q10A – Setting areas is restrictive & may adversely affect cost benefits.		Noted.

Response Reference Number	Consultation Number	Date Received	Name	Job Title/Organisation	Address	Summary of Points Made	Response Acknowledged?	Council's Initial Response
						• Q11 – No • Q11A –Setting targets on historical data is unsafe particularly in current economic climate. Industry is shrinking due to exports to India & China, no one is buying cars & farming is in decline. The waste streams concerned will reduce so facilities must be able to cater for changes in the streams. • Q12 – Cost Benefit, Health & Safety issues inside & in vicinity of facilities, Carbon Footprint, Effects upon traffic • Q13 – Yes • Q14 – No • Q14A – A treatment gap is there for a reason. Reduction should contain the requirements to manageable levels if planning for our own arisings. • Q15 – No • Q15A – Land requirements will be dictated by the process involved so these need to be identified in the first instance. • Q16 – Yes • Q16A – No – If an annual review shows a problem this needs to be dealt with before the 5 year lapse. • Q17 – No • Q17A – Speculative & Irrelevant. • Q18 – Yes • Q18A – Consult local communities, parish & district councils as they know the area best, have to live there, deal with repercussions. Blind trust in commercial propositions & dubious wealth creating ideas do not ensure the necessary consideration for local communities. • Q19 – Yes • Q20 – No • Q20A – The list is a straight jacket & not comprehensive enough when flexibility is required • Q21 – No		Agreed. Noted. Noted. Noted. Agreed. Noted. Noted. Noted.

Response Reference Number	Consultation Number	Date Received	Name	Job Title/Organisation	Address	Summary of Points Made	Response Acknowledged?	Council's Initial Response
						• Q21A – Awareness of current/good practice & solutions, all should be applied as necessary for the identified arisings. Cost effective solutions should be applied through common sense. Energy creation needs urgent consideration, we cannot afford not to. • Q22 – No • Q22A – Cannot have a strategy for a concept. Each waste management process/method will have its own facility specification. • Q23 o Emphasis on reduction & re-use o Statutory requirements for reduction then handling of commercial waste o Consultation with every member of the public affected by any proposal, address all their needs & concerns before planning consent is given. o Address issues of compensation & reward for loss of amenity. o Provide reductions in council tax for areas affected by any proposal. o Affected communities to be beneficiaries of any energy generated.		Noted. Noted. Agreed. Noted, but not within LAA's power. Noted. Noted. Noted. Noted.
0086.		19.12.08		Beckford Parish Council	C/o Hylton Cottage, Grafton, Tewkesbury, Gloucestershire, GL20 7AT	• Q1 – No Comment • Q2 – No • Q2A – Needs monitoring. Links to cancers, MND, ME, MS. Diseases • Q3 – No / Don't know – needs something. • Q4 – Yes • Q5 – Yes • Q6 – No Comment • Q7 – Yes – Hospitals? • Q8 – No Comment • Q9 – Don't know • Q10 – No – Maybe to restructure.	6.1.09	Noted. Noted. Noted.

Response Reference Number	Consultation Number	Date Received	Name	Job Title/Organisation	Address	Summary of Points Made	Response Acknowledged?	Council's Initial Response
						• Q11 – Yes • Q12 – No Comment • Q13 – Yes • Q14 – Yes • Q15 – Yes • Q16 – Yes • Q16A – Yes • Q17 – Yes • Q18 – No Comment • Q19 – Yes • Q20 – No Comment • Q21 – No • Q22 – Yes • Q23 – Biogester? As per Gloucestershire.		Noted.
0087.		19.12.08	Mr Martin Cooper	Regional Director/ Halcrow Group Limited	Red Hill House, 227 London Road, Worcester, WR5 2JG	• **Responded by letter** • Halcrow are very much in support of the County Council's work to review the Waste Management Vision & Strategy. • Halcrow work with their clients in industry & government, within & beyond the county to actively respond to & meet the 2010, 2015 & 2020 targets set in Waste Strategy for England 2007 & the 2020 target in the Waste Framework Directive 2008.	7.1.09	Noted.
0088.		19.12.08	Vaughan Welch	Branch Chairman/ The Inland Waterways Association	Birmingham, Black Country & Worcestershire Branch, 29 Dice Pleck, Northfield, Birmingham, B31 3XW	• **Responded by letter** • Little indication of how the movement of waste by road be reduced. The proposed policy on p33 should be more clearly written to specifically include sustainable transport, thus including the transport policies in the RSS & how they will be implemented when moving waste in bulk. • Two rivers, the Severn & Avon both capable of moving bulk waste in an environmentally friendly way, serve county. Appears to have been overlooked ever though it is a clear requirement in the RSS (T10) to consider them.	7.1.09	Noted. The Council is preparing a paper for consultation on the possible role of waterways in waste management.

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						• The Avon Navigation Trust (totally independent of the British Waterways) should be consulted recognising them at the same level as the British Waterways. • The Water Framework Directive (WFD) is the most significant legislation since the CROW Act yet there is only a brief reference in the preamble to question 19. • Q3 – In light of the global change & need to create sustainable plan, mineral waste & the transport thereof should be included. With the potential for different individual policies the risks to the sustainability (&the requirements of the WFD) of the policy could be considerable. • Q4 – No it doesn't, it all but excludes the WFD & the effects thereof. • The appropriate revised policy p33 generally overlooks the RSS sustainable transport policies where a much clearer commitment is needed. • Q19 – Yes – the River Severn Catchment Flood Management Plan (it should be noted that this is different from the River Severn Basin Management Plan).		Noted. Noted. Noted. Agreed.
0089.		19.12.08	John Pattinson	Head of Planning/ West Midlands Regional Assembly	Albert House, Quay Place, 92-93 Edward Street, Birmingham, B1 2RA	• **Responded by letter & included a Regional Conformity Assessment** • The Regional Policy Leader for Waste: 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, W12. Further explanation & clarification is required. • Policies WD1, WD2 & WD3 sets the framework in the existing RSS for the delivery of the targets in the National Waste Strategy.	7.1.09	Agreed. Agreed.

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						• The Waste Policies in the Phase 2 Revision are relevant & need to be addressed. ○ W1: P33 in the document indicates how Worcs intends at this stage to address this policy. ○ W2: The response of the authority to C&I waste is unclear. P38 says the RSS does not provide 'detailed prescriptions' but the policy does say the LDD needs to make a minimum provision of new facilities 'at sites distributed across their areas'. In addition when determining the location of new additional capacity the Phase 2 revision sets down policy criteria W5. This needs to be clarified. ○ W3: Reasons for not addressing Table 7 are not well made & need further explanation. As a result it is not clear how the authority intends to address policy W3 in the core strategy. ○ W4: P33 indicates how Worcs intends at this stage to address this policy. ○ W5: Policy not addressed in the document. This will be pertinent in part to answering Q10. ○ W6, W7: Policies have not be addressed. This will be pertinent to various questions in the plan. The RSS makes it clear that policy support is needed to plan for waste management requirements in rural locations. ○ W8: P18 indicates how Worcs intends at this stage to address this policy.		Agreed.

Response Reference Number	Consultation Number	Date Received	Name	Job Title/Organisation	Address	Summary of Points Made	Response Acknowledged?	Council's Initial Response
						○ W9: The RSS Phase 2 revision does address the issue of C&D waste. It requires as a priority the identification of new sites for facilities. It also sets down prescriptions on how to recycle more waste. Comments on p17 that the RSS does not require C&D wastes to be addressed are hard to follow. P38 that there are no detailed prescriptions is difficult to understand, needs to be clarified. ○ W10: This is not specifically relevant. However, it would be helpful if Worcestershire could identify how much contaminated soils emanate from the county & are treated in the county & elsewhere. ○ P33 indicates how Worcestershire intends at this stage to address this policy. ○ P19 comment that no Hazardous Waste Sites are identified needs further explanation. P18 says it exports 55.2% to specialist facilities outside the county yet one guiding principle on p33 is that the county will develop a network of sites, which will deal with all wastes produced in Worcs. There is no explanation why a plant providing for 50,000 tonnes+ is not viable in the county, needs to be clarified. • On Mineral Wastes the document needs to address the requirements of the EU Directive on Mine Wastes. • P34 is a second local objective, not clear how to interpret the effects of the objective as the term local distinctive is not defined. And the objective is narrowly focused on the waste arising from the distribution of development. The objective should be to create a network of facilities to address all waste produced in the county up to 2027.		Noted. Agreed.

Response Reference Number	Consultation Number	Date Received	Name	Job Title/Organisation	Address	Summary of Points Made	Response Acknowledged?	Council's Initial Response
						• The document is in general conformity with the existing RSS & emerging Phase 2 revision, which is at the EIP stage of the process, but certain matters need further explanation & clarification (Policies W2, W3, W5, W6, W7, W9, W10 & W12).		Agreed.
0090.		19.12.08		Sainsburys Supermarket	Abbey Trading Estate, Alvechurch Highway, Redditch, Worcestershire, B97 6RF	• Q1 – No • Q2 – No • Q2A – Maybe helpful if storage limits & containment systems were subject to some policy statement to prevent long term storage & run-off to watercourses. • Q3 – Yes • Q4 – Yes • Q5 – Yes • Q5A – Set out the statement with bullet points may help understanding. • Q6 – Yes • Q7 – Yes • Q8 – Yes • Q9 – Yes • Q9A – Monitoring is essential to the success of the plan but exactly what to monitor is not immediately obvious to me. • Q10 – Yes • Q11 – Yes • Q12 – Yes, please see Q9A. • Q13 – Yes • Q14 – Yes • Q15 – Don't know • Q16 - Yes • Q16A – Yes	7.1.09	Agreed. Noted. Noted. Noted.

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						• Q17 – Yes • Q18 – No • Q19 – Yes • Q20 – Yes • Q21 – Yes • Q22 – Yes • Q23 – No Comment		
0091.		19.12.08	J B McKnight		Granary Cottage, Manor Farm, Stoulton, Worcester, WR7 4RS	• Identical to response 0065	7.1.09	Noted.
0092.		19.12.08	Henning Totz	Senior Policy Officer/ South West Regional Assembly	Dennett House, 11 Middle Street, Taunton, Somerset, TA1 1SH	• Responded by letter • The Regional Planning Body (RPB) assesses consultations on Local Development Documents (LDDs) on how far they impinge on the delivery of the Regional Spatial Strategy (RSS) & whether the document is in 'general conformity' with the RSS. • A new RSS is being produced. The Examination in Public (EIP) of the draft RSS (dRSS) closed on 6th July 2007 & the Panel Report published in January 2008. The evidence base behind the emerging RSS can be considered as a material consideration & will carry greater weight the closer to publication the RSS gets. The Secretary of State's proposed changes to the dRSS were published on 22nd July 2008 & public consultation closed on 24th October 2008. • The draft revised RSS for the South West contains four policies on waste management (Chapter 7, policies 1-4), and one policy on recycled & secondary aggregates (Chapter 7, Policy RE12).	7.1.09	Noted. Noted. Noted.

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						• The Draft Vision Statement: SWRA welcomes that waste minimisation will be a priority for Worcestershire, waste be treated as a resource & treated in the county as far as possible. SWRA supports that waste management facilities will be located close to where waste arises, in particular the growth areas like Worcester & Redditch & to the lesser extent at other towns & cities in the county. This is broadly in line with the approach adopted in the draft revised South West RSS (policy W2), focussing development of strategic sites at the Strategically Significant Cities & Towns (SSCTs) & to the lesser extent at Market Towns. • SWRA generally support if the WCS identified strategic sites for waste collection, transfer, treatment & disposal to implement the vision & objectives, & diverting from landfill. It is key to ensure a high degree of self sufficiency to ensure that waste will be treated in the county as far as possible & provide a framework which contributes to reducing the amount of waste treated in neighbouring regions/WPA areas, which is also thrust of the draft revised RSS for the South West.		Noted. Noted.
0093.		19.12.08	John Stedman	Parish Clerk/ Pebworth Parish Council	CV37 8YA	• Q1 – No • Q2 – Yes • Q3 – Yes – however restoration should be monitored to ensure a good standard & fit for local environment. • Q4 – Don't know • Q5 – Yes • Q6 – Yes • Q7 – Yes • Q8 – Yes • Q9 – No • Q10 – Yes • Q11 – Yes • Q12 – No Comment • Q13 – Yes	7.1.09	Agreed.

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						• Q14 – Yes taking into account that information that is missing from the RSS • Q15 – Yes • Q16 – Yes • Q16A – Yes • Q17 – Yes • Q18 – No • Q19 – Yes • Q20 – No • Q20A – The Green Belt development should be A2. All development with GB should be Brownfield. • Q21 – Yes • Q22 – Yes • Q23 – No Comment		Noted. Noted.
0094.		19.12.08	Katie Limm	Clerk/ Belbroughton Parish Council	5 Whitford Gardens, Bromsgrove, Worcestershire, B61 7LE	• **Responded by e-mail** • Please note that the Dodford with Grafton Parish Council supports the first two points below, namely support for the guiding principles but the wish to see more explicit reference to protection of the Green Belt in the Vision Statement. • We support the guiding principles set out in the document & pre-eminence given to conservation of the environment & amenities. • We would like the vision statement to be more explicit that green belt land will not be compromised for waste management. • We support that the strategy should not include specific policies on managing organic agricultural waste & landowners & farmers should manage material as they have traditional done as fertilizers or soil improvers on the land where it arises.	7.1.09	Agreed/ Noted. Noted. Agreed.

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						• We note the proposal that the strategy should not include specific policies to manage waste arsing from mineral workings leaving quarry & gravel pit operators to manage these materials in accordance with their planning permissions. This is only acceptable if planning conditions are robust & properly monitored. Adequate assurances that this is the case need to be built in waste management monitoring & review arrangements as well as into the planning system.		Agreed.
0095.		19.12.08	Jonathan Elmer	Senior Forward Planning Officer/ Wyre Forest District Council		• **Responded by e-mail & table of comments, reference highlighted in bold, followed by comment.** • A suggested amendment to the vision: "*By 2027, most waste management facilities will be in the broad area centred in & around Worcester & Redditch, as the settlements of significant development. Facilities will also be included within Kidderminster & Bromsgrove, commensurate with the lower levels of growth proposed for these settlements".* • **"there will be some new waste management facilities in or around Bromsgrove & Droitwich & possibly some where they would assist in the regeneration of Kidderminster"** Agree with this sentence if it can be demonstrated that facilities can assist in the regeneration of Kidderminster. Concern over the 'wrong' types of waste facility potentially being detrimental to the regeneration focus of Kidderminster. • **"There will be fewer new facilities however in Stourport, Bewdley & Evesham & fewer still in or near Malvern, Pershore, Upton & Tenbury unless special local conditions justify it"** The sentence reads in an almost hierarchical way. It appears the first list of settlements will have more waste facilities than the second list (Malvern, Pershore etc).	8.1.09	Agreed. Noted. Noted. Noted.

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						• The vision indicates in an earlier sentence "most new waste management facilities will be located close to where most wastes are produced". It would therefore 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). • **Draft Spatial Portrait – "The canal network is extensive & connects systems to the north, south & east of the county. The potential for the use of water to transport materials, including waste is considerable, if undeveloped at present."** The notion of using waterways as a means of transport is generally supported. However this will require careful consideration as 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. • **Draft Spatial Portrait –** maybe useful to highlight Central Technology Belt on Map 3 in appendices, which currently highlights existing major industrial areas. May help people to understand where future major investment areas could be developed & where there could be demand for waste management facilities. • **Q10 –** Agree that waste management capacity should be distributed proportionally across all of the Districts, taking into account local circumstances, distribution growth & working on the 'proximity principle'.		Agreed. Noted. Agreed. Noted.

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						• **Q11 –** Agree with 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 the RSS Phase 2 revision, as follows; ○ Bromsgrove – 7.3% ○ Malvern Hills – 11.5% ○ Redditch – 17.7% ○ Worcester City - 28.1% ○ Wychavon – 23.9% ○ Wyre Forest – 11.5%		Noted.
						• **Q15 –** Agree with the proposed approach to adopt the stated amounts of waste to land ratios as a working basis. Strongly support the monitoring of applications & the proposal to revise the strategy in light of any emerging evidence/local circumstances.		Noted.
						• **Q17 –** No – The District Council feel that it would be difficult to provide clear/meaningful guidance within this longer time frame. It is felt that an earlier review, in light of any changing circumstances, would be more appropriate & that the timeframe for the WCS should reflect the current RSS, which indicates where growth (& therefore associated waste) will occur.		Noted.
						• **Q20 –** Agree with the approach to developing the strategy based on the options listed, subject to the options for larger & centralised facilities not prejudicing the proximity principle.		Noted.
						• Explanation of implications of not incorporating the BPEO strategy would be of use & help to understand the options more fully.		Noted.
						• **Hazardous Waste (P19) –** Support the approach regarding Hazardous Waste within the document.		Noted.
						• **Possible Future Issues (P48) –** Concerned the Wyre Forest Core Strategy is not included in the list of important documents.		Agreed.

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						• **Municipal Solid Waste (MSW) –** Concern that there is no approach to deciding how MSW management facilities could potentially be split throughout the county. • **New Technologies –** More account needs to be taken of the potential of new technologies, excluding incineration, to treat & reduce the impact of waste going to landfill. • **General Comment –** The Council reserves the right to make further comment during the preparation stages & once the final document has been published.		Noted. Agreed. Noted.
0096.	1094 – L	19.12.08	Chris Lambart	Land Use Planning Adviser/ National Trust	41 Broad Street, Welshpool, SY21 7RR	• **The National Trust only wishes to respond to question 4 & 4A** • Q4 – No • Q4A – We welcome the recognition of cultural factors in the landscape as an issue with specific relevance in Worcestershire. The paper identifies most of the main nationally designated cultural assets but does not refer to historic parks & garden, even though these are nationally recognised designation & referred to as such in PPS10 Annex E. Worcestershire has several significant historic parks, including Croome, Capability Brown's first masterpiece, regarded as the fountainhead of the English landscape movement which the National Trust has been restoring since the mid 1990s.	7.1.09	 Agreed.
0097.		19.12.08	Kazi Hussain	Senior Regional Planner/ Advantage West Midlands	3 Priestley Wharf, Holt Street, Aston Science Park, Birmingham, B7 4BN	• Q1 – The agency recognises the need to treat waste arising within the County. • There is a need for treatment/recycling infrastructure for construction & demolition waste, which includes contaminated wood, plastics, glass, plasterboard etc. The agency feels this should be considered by the strategy & further monitoring is required.	7.1.09	Noted.

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						• Q2
						  ○ No the agency considers there is an opportunity to develop organic treatment facilities e.g.anaerobic digestion within the county.
						  ○ In the RSS local authorities are required to make provision for the equivalent waste arising in their area.
						  ○ The Waste Strategy 2007 also requires local authorities & RDAs to help better understand C&I waste.
						• Q3 – Yes, a flexible approach will be required to meet need & demand where necessary.
						• Q4 – Yes, however there maybe the need for amending the portrait in light of NLP report/ options & Growth Points. An increased number of housing will lead to further waste infrastructure being required.
						• Q5 – Yes, the agency agrees with the vision & aim of the WCS.
						• Q6 – Yes, the agency agrees with the strategic objectives of the waste core strategy.
						• Q7 – The agency considers that the plan should make provision to treat low-level nuclear waste, in order to improve the overall waste infrastructure in the county.
						• Q8 – Yes
						• Q9 – Further data is required on construction & demolition waste & commercial & industrial waste & there should be a key analysis undertaken on the amount of waste being recovered.
						• Q10 – Yes. The 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.
								Noted.
								Agreed.
								Noted.
								Agreed.
								Agreed/
								Noted.
								Noted.
								Noted.
								Agreed.
								Noted.

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						• Q11 – No Comment		
						• Q12 – In light of the economic downturn & the landfill tax escalator it is important to monitor the impacts on waste arising & the cost to the local authority & businesses.		Noted.
						• Q13 – Yes, however other information made available through RTAB & AWM should be considered & used to test assumption. In addition RSS data should also be used		Agreed/
						• Q14 – Yes. 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.		Agreed.
						• Q15 – These standards should be based on national standards. The figures used in the SLR report were based on the figures used for London's Strategy.		Noted.
						• Q16 – The plan should look as far as is reasonably practicable, however the waste industry is developing rapidly & could be completely changed by 2021. New technology may change the outlook within a 5-year period!		Noted.
						• Q16A – 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.		Noted.
						• Q17 – The agency considers that existing waste facilities should be helped to maximise capacity, then look for new sites.		Noted.
						• Q18 – The use of robust Environmental Impact Assessments on major sites should be encouraged.		Noted.
						• Q19 – No Comment		
						• Q20 – The guidance should align with national & regional policy on waste		Agreed.

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						• Q21 – The plan should identify a range of waste management technologies to meet the need for future waste demands, infrastructure capacity & maximising treatment options. • Q22 – Location of waste generation & the demand for recyclate & 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. • Q23 – No Comment		Noted. Noted.
0098.		22.12.08	Mr S M Salter	Operational Compliance Manager/ Morgan Advanced Ceramics	Bewdley Road, Stourport on Severn, Worcestershire, DY13 8QR	•		
0099.	146 – C	22.12.08	Mrs M L Tappenden	Assistant Planning Manager/ Biffa Waste Services	Portland House, Birkenhill Lane, Birmingham, B37 7BQ	• Q1 – No • Q2 – Yes • Q3 – Yes • Q4 – Yes • Q5 – Yes • Q6 – No – 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. • Q7 – Yes • Q8 – Yes • Q9 – Yes • Q9A – Monitor what planning consents are being given & what capacity is coming on stream. • Q10 – No • Q10A – 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 county wide level then identify sites for new facilities to meet that requirement & also provide criteria against which applications can be judged.	8.1.09	Noted. Agreed. Noted.

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						• Q11 – No • Q11A – This is too detailed. See comments in • Q10A. The core strategy should look to identify the capacity gap & outline in broad terms how this will be met. The core strategy should also consider identifying strategic sites, which it currently does not mention. • Q12 – This is a sensible & practical approach to monitoring. • Q13 – Yes • Q14 – Yes • Q18 – No • Q19 – Yes • Q20 – No • Q20A – **Option A3** is contrary to policy in Planning Policy Guidance 2, which sets out government policy on green belts. PPG2 states at paragraph 3.4 that the construction of new buildings within the green belt is inappropriate with a few listed exceptions, none of which is waste related development. PPS10 states that planning authorities should recognise the special locational needs of some waste facilities in the green belt, this does not alter the fact that built waste development in the green belt is inappropriate. It is for an applicant to demonstrate very special circumstances that mean that their proposed development should be allowed. • It is not for the WCS 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.		Noted. Noted. Agreed.

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						• **Option B1 –** it is difficult to support this option in the absence of a list of identified sites. 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. • **Option C1** is 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. Emerging practice on other Core Strategies around the country does now seem to have resulted in the expectation that Core Strategies will at least identify specific sites that are fundamental to the delivery of the Strategy. If the option of focussing on primary larger sites is taken forward then the core strategy will need to demonstrate why this is the best option & will need to identify a range of potentially suitable large sites. • **The same comments apply to option D1** • We consider it is appropriate to incorporate the principles from the BPEO strategy into the plan but the concept of BPEO no longer has any policy basis & should not be referred to in a newly emerging plan. • Q21 – Yes • Q22 – Don't know • Q22A – This is not easy to understand. • Q23 – No Comment		Noted. Noted. Noted. Noted. Noted.
00100.	549 E(S)	23.12.08	Ms J Shields	Parish Clerk/ Childswickham Parish Council	Potenza, Chapel Lane, Kinsham, Tewkesbury, Gloucestershire, GL20 8HS	• Q1 – No • Q2 – No • Q2A – Would it not be better to have some control through DEFRA or the EA of what might be discharged onto the land or into watercourses? Have some coordination between strategic bodies over a framework to control possible contamination?	8.1.09	Agreed.

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						• Q3 – Yes – contained by PP (in consultation with related bodies) • Q4 – Yes • Q4A – Someone will exploit the county boundaries as we live so close to Gloucestershire & Warwickshire. We question where the fly tipping in the village emanates from? • Q5 – Yes • Q5A – This policy & reasons behind it need better publicity – people need to be made aware that they are the cause of 'the problem' & an important solution, local papers, chamber of commerce, libraries & list information, WFDC already produces. • Q6 – Yes but also actively discourage those who flaunt the law & pursue through the legal system. • Q7 – Yes • Q8 – Yes • Q8A – Some waste products could be handled on a regional basis/context? • Q9 – Yes • Q9A – Is it possible to quantify the amount the amount of waste/recycle more accurately? Incentives to those who achieve reduced waste through council tax? • Q10 – Yes probably better/best. • Q10A – Note earlier comment about coming in from outside the county or even region (due to proximity/ convenience) • Q11 – Yes • Q12 – The incidence of those trying to avoid the system – nuisances. • Q13 – No • Q13A – Commercial & Industrial processes will attempt to circumnavigate the system if/when 'too costly'.		Noted. Agreed. Agreed. Agreed. Noted. Not possible at present. Noted. Noted. Noted.

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						• Q14 – Don't know • Q14A – Could information be gathered from contractors on actual activity? • Q15 – Yes • Q16 – Yes • Q16A – No – More frequent systems • Q17 – No • Q17A – Problem with all this projecting is there is insufficient will & funding to make it happen. The process gets bogged down in politics & consultation. • Q18 – Don't know • Q19 – Yes • Q20 – No • Q20A – Don't agree with A3 – generates traffic & environmental nuisances that should be contained in urban areas. • Q21 – Yes • Q22 – Yes • Q23 – No Comment		Noted. This is now being undertaken. Noted. Noted. Noted.
00101.		23.12.08	Mike Price	Senior Planning Manager/ Government Office for the West Midlands	Sustainable Futures Directorate, 5 St Philip's Place, Colmore Row, Birmingham, B3 2PW	• **Responded by letter** • As a general comment the Waste Core Strategy should be prepared in accordance with PPS10 & particular account should be given to paragraphs 16 to 19. • We support the approach of presenting issues in terms of general principles & targets contained in the DEFRA Waste Strategy but are concerned that this is not moving forward the debate on how these will be delivered. The document appears to be setting ground rules for the development of the strategy which may be delaying progress at a time when Worcestershire needs urgently to address the means of reducing municipal waste going to landfill.	8.1.09	All comments noted. Meetings will be held with GOWM to clarify the issues raised.

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						• We accept that it is important to build on the work that you previously undertook. However, we are concerned that you are proposing to proceed on the basis of the options that were included in the previous WCS. You will need to demonstrate that all reasonable options have been considered & they must be expressed in a spatial way. • It appears to be putting forward options, e.g. Q7, 8 & 21 of not following government guidance. You will need good, clear reasons for this which can be justified in the Examination of the Waste Core Strategy. In relation to Q21 it may be desirable to identify a preferred technological solution to enable development or to test its feasibility against a range of planning criteria. • We note you are intending to prepare & consult on a preferred options, the WCS is being prepared under the 2008 Amendment Regulations & the revised PPS12 consequently this is no longer a requirement. However it is acceptable to follow that course of action if you think appropriate. • We are please you are encouraging continuous engagement with stakeholders. It is particularly important to engage the industry, agencies such as the EA, Natural England, English Heritage & Worcestershire Districts as they are preparing their respective Core Strategies. • Appears to be little mention of emerging Core Strategies. We would expect to see this relationship brought out more clearly as the WCS is developed. You have however set out the links between the WCS & the RSS, the Worcestershire Sustainable Community Strategy & the Joint Municipal Waste Management Strategy. • The 'Waste Background' in part 2 of the document provides a useful summary of information on waste in Worcestershire.		

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						• The spatial portrait being set out in another doc may cause difficulties for some stakeholders. It would be preferable for at least a summary of the spatial portrait to be included. The spatial portrait is important in setting the context for the issues & options & helping the Waste Core Strategy to be locally distinctive. It would also benefit from the use of a diagram to show waste movements, the key urban areas & cross boundary issues. • The draft vision statement is a useful starting point for consultations. It takes into account linkages & networks both within the county & the wider region. We would expect to see this developed as work continues through the Preferred Options to the publication stage. • The objectives should be refreshed but we do have some concerns. Some of the listed guiding principles could be regarded as possible policy approaches, which would need to be tested. 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. • Concerned that radioactive waste is not being considered. Low-level radioactive material is being produced by a variety of industries & is becoming more difficult to deal with. In addition you will need to deal with that which is identified in the RSS in order to be in general conformity & to comply with PPS10.		

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						• With regard to the development of options the consideration of scenarios based on broad concepts is a reasonable approach. The scenarios need to be spatial & addressing the particular issues facing the county in order that the strategy is locally distinctive. The scenarios also 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, including the provisions of the emerging RSS. • You have correctly stated that the BPEO is no longer government policy but 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. • Delivery & monitoring are important elements of the LDF system. You have made reference to monitoring but will 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. This should also include roles & programmes of key stakeholders, which are important to the delivery of the strategy. • Our main concern is whether your treatment of spatial options will ultimately be adequate to allow you to demonstrate the strategy is sound.		

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00102.		29.12.08	Kevin Harvey	Network Strategy Manager/ NS West Midlands, The Highways Agency	5 Broadway, Broad Street, Birmingham, B15 1BL	• Q1 – N/A • Q2 – N/A • Q3 – N/A • Q4 – Yes • Q5 – Yes • Q5A – Pleased to note that tackling carbon emissions & promoting sustainable development are key drivers of our policy. In seeking to satisfy these 'drivers' the Highways Agency recognises & supports the principle of locating waste management facilities close to where waste is produced. To further reinforce the concept of sustainable development the following addition to the vision statement is suggested; *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.* • Q6 – Yes – The Highways Agency continues to support the original objectives for the WCS, in particular that which seeks to reduce transport impacts. Furthermore is pleased to note that following the principle of sustainability, and reducing the transportation of waste by road, are proposed Guiding Principles. Both of these principles adhere to the role & responsibilities of the highways agency, and for that reason, the agency would wish to see these embedded throughout the document so as to robustly mitigate the impact of development on the SRN. • Q7 – N/A • Q8 – N/A • Q9 – N/A • Q10 – Yes	9.1.09	Noted. Noted.

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						• Q10A – The Highways Agency recognises that the location of waste management facilities is largely dictated by the direction of growth prescribed by the current & emerging RSS, & subsequent LDFs. Therefore the Highways Agency wishes to see a WCS that explicitly considers first the prescribed broad spatial direction of growth, & then examines the most appropriate location for Waste Management facilities. The Highways Agency agrees that most logical approach to 'formally' allocating sites is by District & Borough Council Area		Noted.
						• Q11 – N/A		
						• Q12 – The Highways Agency is pleased to note that waste movements in & out of the County will be monitored. Additionally, we wish to see waste movements within the County monitored also to ensure that facilities are located within the most sustainable locations i.e. near to where waste is generated.		Noted.
						• Q13 – N/A • Q14 – N/A • Q15 – N/A • Q16 – Yes • Q16A – Yes • Q17 – Yes		
						• Q17A – The Highways Agency recognises the difficultly in providing a WCS sufficiently flexible to accommodate growth additional to that anticipated. Overall the Highways Agency supports 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.		Noted.
						• Q18 – No		
						• Q18A – Pleased to note that 'traffic & access' will be considered when assessing the environmental impact of the proposed sites.		Noted.

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						• Q19 – No		
						• Q19A – The Highways Agency considers RSS Phase 2 Revision as an important ' strategy' to consider, on the basis that it is still as the Preferred Options stage it has yet to be examined.		Noted.
						• Q20 – Yes		
						• Q20A – However, we wish to see a WCS 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.		Noted.
						• Q21 – N/A		
						• Q22 – No		
						• Q22A – Wishes to see impact upon the SRN included.		Noted.
						• Q23 – Overall the Highways Agency supports the overriding principles set out in the document.		Noted.
						• For a purpose of clarity it is suggested that clearer distinction be made between the current & emerging RSS when referring to these strategies. The term 'RSS' is, at times, used interchangeably to describe the current & the emerging strategies (for example p38 & p46), which can make it difficult to properly interpret the aspirations & policies of the WCS.		Agreed.
						• Additionally, in light of guidance set out in PPS12, the Highways would wish to see the WCS founded upon a robust evidence base so as to satisfy the test of soundness. The Highways Agency recognises that the onus to test the impact of sites lies with the County Council, however the Agency will welcome working in partnership so as to provide a robust evidence base upon which sound policies can be proposed.		Noted.

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						• The Highways Agency welcomes the opportunity to engage in frontloading discussions with WCC & in doing so would be open to attend relevant workshops, interviews & focused consultations highlighted in the consultation document.		Noted.
00103.	1443 - W	5/1/09	John J. Wilson		Hytten, Springfield Lane, Broadway, Worcestershire, WR12 7BT	• Responded by letter with attached questionnaire, North Devon Journal article (6/11/08) and article from The Sunday Telegraph 'How to turn paper mountains green' (11/1/09). '£39.3m scheme to turn waste into energy' • 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. • No reference is made in the report on the disposal of the products of recycling. Reports abound of Refrigerator & Electronic goods mountains & the recent collapse of the market for paper, plastic & metals indicate that 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. • Emphasis on composting is given but where is the market for the product. An adjacent county could not dispose of its composted waste & was reduced to sending it to landfill, but it did not qualify as recycled waste. • WCC & its contractor must give detailed consideration to the disposal of the products of waste management.	9.1.09	Noted. Noted. Noted. Noted. Noted.

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						• The strategy document makes no reference to the 25-year contract entered into in 2001 with Mercia Waste. No reference to the central Envirosort plant (Norton), plan to build incinerator in Worcestershire following failure to get agreement in Hartlebury. These plants appear to be designed to handle municipal waste only which represents 20% of total waste. Central & local government appear to give low priority to the other 80% caused by Commercial & Industrial waste, which should be treated at similar sites to municipal waste. • The time scale for the report is grossly excessive, initial consultation 2004, adoption 2012. In this period WCC has taken a decision on Envirosort & will decide on a site for incineration effectively making the report redundant. • Article 'How to turn paper mountains green' highlights that Defra & ImechE missed that paper, cardboard and other biodegradable refuse used for fuel is classified, under EU directive 2001/77, not as waste but as 'biomass', counting as a "renewable energy source". The waste incineration directive does not apply. • Q1 – No • Q2 – Yes • Q3 – Yes • Q4 – No • Q4A – Any portrait must be acceptable to the population affected. This will need education of the population. • Q5 – Yes • Q5A – The vision is idealistic. With the reduction in retail outlets more, not less goods will be pre-wrapped. The statistics in part 2 show that only 18% of waste is municipal waste, yet this is the area that the government spotlights. There will be a need to develop a waste transfer facility similar to that of the now defunct G.L.C.		Agreed. Noted, but timetable has been agreed with government. Noted.

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						• Q6 – Yes – However the report is long on vision & options but lacks any reference to plans & implementation. • Q7 – Yes • Q8 – Yes • Q9 – Yes • Q9A – Financial saving for ratepayer • Q10 – No • Q10A – Production of C&I waste can vary in quantity & time depending on the economic activity. District Councils are too small to handle this therefore C&I should be handled on a countywide basis. • Q11 – No • Q11A – See answer to Q10. If local capacity is required then the county should split with Malvern, Worcester & Wychavon as one unit & Kidderminster, Redditch & Wyre Forest the other. Take advantage of economies of scale. • Q12 – No Comment • Q13 – Don't know • Q14 – Yes • Q15 – No • Q15A – If incineration is adopted then landfill would be reduced. • Q16 – Yes, the problem is the adoption date. It will take 5 plus years to implement new systems by which time the issues may have changed. • Q16A – Yes • Q17 – Yes • Q18 – No • Q18A – It will not be possible to satisfy all parties in selecting sites so WCC should be resolute in its implementation & not concede to narrow factional interests.		Noted. Noted. Noted. Noted. Agreed. Noted. Agreed.

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						• Q19 – Yes • Q20 – Yes • Q21 – No, IP is for WCC & district councils to lead. In new urban areas waste treatment can provide energy & district heating, & should be incorporated in total planning. • Q21A – More emphasis should be given to incineration, which reduces volume of waste by at least 90% & produces heat & energy. Modern systems are pollution free. • Q22 – Yes		Noted. Noted.
00104.		19.12.08	Chris Smith	Heaton Planning on behalf of Lafarge Aggregates Ltd	9 The Square, Keyworth, Nottingham, Ng12 5JT	• **Responded by letter** • Lafarge Aggregates Ltd (LAL) do not have any significant waste interests & therefore our response is brief. • The company does have a landholding in the County with the potential for both minerals & waste interests. • Overall we support the approach in the WCS that the proposed Minerals & Waste Core strategies do not contradict each other. • We would be pleased to be consulted further in the next stages of the WCS.		Noted. Noted. Noted. Noted.
00105.		16.1.09	Amanda Smith	Regional Planner/ English Heritage (West Midlands)	The Axis, 10 Holliday Street, Birmingham, B1 1TG	• **Responded by e-mail** • Q4 Draft Spatial Portrait – Cultural component of the portrait is very weak and urge you to expand to include		Noted.

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						○ More detailed overview of the landscape character for example, on the county landscape character assessment. The County Wide historic landscape characterisation currently underway and will serve to complement the landscape character assessment in providing a more detailed understanding of the historic evolution and surviving historic character of the landscape. This should also include an overview of the County's settlements such as its historic market towns, villages and cathedral town of Worcester. The Malvern Hills AONB should be referenced. ○ The latter should 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 such as archaeological remains, historic buildings and other historic features and areas. In addition it should be recognised that the setting of designated assets is also an important consideration. ○ Map 1. We object to Map 1 excluding other nationally designated historic assets such as (Registered Parks and Gardens, Registered Battlefields, and Listed Buildings). These should be regarded as Primary Constraints in addition to Scheduled Monuments (and other nationally important remains).		Noted. Noted. Noted.

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						○ Information on the condition of an expanding range of designated historic assets is available via English Heritage's Heritage at Risk Programme (http://www.english-heritage.org.uk/server/show/nav.19074). The 2008 Heritage at Risk Register includes data on listed buildings (Grade I and II*) considered to be at risk as well as structural Scheduled Monuments - a supporting report for the West Midlands provides further information on the risk status of all Scheduled Monuments. For the first time Registered Battlefields at Risk are included in the Register and for the West Midlands the Worcester Battlefield is identified as at risk. ○ For further information the County Council's historic environment team should be contacted. They can best advise on access to and interpretation of data held in the Historic Environment Record. • Q5 – The vision should retain a strong and clear statement that future waste management will not damage natural or cultural assets. The Vision specifically identifies that new waste related development will not be located in or near areas vulnerable to flood risk. We recommend that a similar reference to new facilities is also included in the following paragraph on waste management and natural and cultural assets i.e. new facilities will not damage the site or setting of natural and cultural assets. Should the vision also address the wider, but related, issue of behavioural change across all sectors and communities with respect to the waste cycle?		Noted. Noted.

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						• Q6 – We broadly support the general thrust of the proposed set of guiding principles, and in particular the priority given to the objective on conserving and enhancing the natural, built and historic environment. With respect to the Draft Local Objectives we have the following comments: ○ Objective 1: Some of the documents listed are not plans or strategies per se, but rather frameworks of information or assessments. If this approach is retained we suggest that 'frameworks' is added to the list. More generally we are 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: We have concerns at the use of the phrase 'locally distinctive' since this can be associated with many different considerations. Is the emphasis on meeting need in terms of the waste production, the type of facilities, or there location? This should be clarified and drawn out more from the Vision which starts to suggest a spatial framework for the distribution of development.		Noted. Noted. Noted.

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						○ Building on our comments on Objective 1, and the primacy of the guiding principle on environmental protection and enhancement, we consider that it would be useful to include an additional objective which is focused on environmental considerations in the planning and management of waste. • Q9 – In the context of our comments on the Draft Local Objectives, we recommend that appropriate environmental indicators are included, this including the historic environment. • Q18 - As indicated in our comments on the Draft Spatial Portrait, and in particular they content of the proposed constraints maps, we strongly recommend that specific consideration is given to the historic environment in terms of designated and non designated assets, and the settings of designated assets, the historic character of the landscape and historic places, and associated aspects such as important views. • Q19 - The County's historic landscape characterisation is ongoing and will represent a continually expanding database for interrogation which should be taken into account. Other data sets which are also being expanded on include the county's resource of historic farm buildings which are currently being mapping and characterised in detail. • Q20 - Depending on the location of 'larger waste management facilities' 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).		Agreed. Noted. Noted. Agreed. Noted.

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						• Q21 & 22 - 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.		Noted.
00106.		16.1.09	James Brian	Assistant Planning Officer/ Development Plans and Conservation Malvern Hills District Council		• Q1 – No • Q2 – Yes • Q2A – Agree with the question for the most part. However the strategy should be more flexible around accommodating future potential targets. You have already suggested that anaerobic digestion targets may be developed however you have not stated that the strategy would respond to such changes. • Q3 – Yes • Q3A – Support principle as long as mineral waste where possible is dealt with on site. Important that the waste Core Strategy and the minerals Core Strategy do not contradict each other. • Paragraph 2 of mineral waste section (top right column on page 19) "In practice, at pres….". Sentence does not read very well and is not obvious what the author is trying to articulate. • Q4 – No		Noted. Agreed.

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						• Q4A ○ Specifically 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. Both the Waste Core Strategy Issues and Options and the draft spatial portrait have missed the opportunity to 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 that has been established at the regional level and ultimately has consequences for the Waste Core Strategy. ○ **11. Population Change:** Reference needs to be made to population migration as well population growth. Under Policy CF3 of the emerging RSS Malvern Hills and Wychavon housing requirements appear to be comprised of roughly 96% and 70% migration respectively. ○ **Support section 13 and 14 –** Paragraph 14.6 the spatial portrait considers that Stourport and Kidderminster have infrastructure problems. Further to this 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 figure are not referenced making it difficult to view the portrait objectively. An example is paragraph 14.11 number of home workers. 15.1% of workforce?		Noted. Agreed. Agreed. Agreed.

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						○ **15. Distribution of the population:** 6th sentence "Most future development over the life…" Not sure what the author is trying to establish. Seems a poorly constructed sentence trying to confirm the fact that Redditch is a settlement of significant development/		Noted.
						○ Page 15 paragraphs 12.7 and 12.8 are incorrectly numbered assumed should read 15.7 and 15.8. Also 12..7 the portrait states Redditch is a District where it is a Borough.		Agreed.
						○ **16.Housing in Worcestershire:** Nice use of the word corollary but I'm not sure this fit in with the simple English Campaign.		Noted.
						○ Paragraph 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 with one exception of the inclusion Chipping Camden in the south eastern corner. PPS10 and your own report identify the strategy must be "spatial in outlook", based on this diagram there is little evidence of this.		Noted.
						• Q5 – Yes		
						• Q5A ○ Can all waste be regarded as useful source of materials? Suggested clarification on the use of the phrase useful source of material.		Noted.

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						• Q6 – No • Q6A - Need to take account of the Worcestershire's City, Districts and Boroughs Local Development Frameworks as local information sources and potential cross county and regional issues. • Q7 – Yes • Q8 – Yes • Q9 – Unsure – require specialist expertise to form an opinion and/ or answer the question • Q10 – Unsure – require specialist expertise to form an opinion and/ or answer the question • Q11 – Unsure – require specialist expertise to form an opinion and/ or answer the question • Q12 – Unsure – require specialist expertise to form an opinion and/ or answer the question • Q13 – Unsure – require specialist expertise to form an opinion and/ or answer the question • Q14 – Unsure – require specialist expertise to form an opinion and/ or answer the question • Q15 – Yes • Q16 – Yes • Q16A – Yes • Q17 – Yes • Q18 – No • Q19 – Yes • Q20 – Yes • Q21 – Yes • Q22 – Yes • Q23 - No Comment		Agreed. Noted.

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00107.		22.1.09		Costcutter	59-63 Barbourne Road, Worcester, WR1 1SB	• Q1 – No • Q2 – Yes • Q3 – Don't know • Q4 – Don't know • Q5 – Yes • Q6 – No Comment • Q7 – Don't know • Q8 – Yes • Q9 – No • Q10 – Yes • Q11 – Yes • Q12 – No Comment • Q13 – Yes • Q14 – Yes • Q15 – Yes • Q16 – Yes • Q16A – Yes • Q17 – Yes • Q18 – Don't know • Q19 – Yes • Q20 – Yes • Q21 – Yes • Q22 – Yes • Q23 – No Comment		