

Worcestershire Waste Core Strategy

SUMMARY OF EMERGING PREFERRED OPTIONS CONSULTATION



Worcestershire Waste Core Strategy

The Council is preparing a "Waste Core Strategy: a plan for how to manage all the waste produced in Worcestershire up to 2027. In September 2008, the Council issued a "Refreshed Issues and Options Consultation" to invite a discussion on how we should proceed. This report is the follow up to that consultation. It sets out in detail the issues we need to address, how we intend to do so and the alternatives we have considered.

November 2009

Summary of Worcestershire Waste Core Strategy

Emerging Preferred Options

Summary for Consultation

Introduction

We all produce waste. It is a fact of life. People in Worcestershire produced about:

- 299,863 tonnes of municipal waste in 2008¹;
- 792, 415 tonnes of commercial and industrial waste in 2007² and
- an unknown amount, estimated to be 818,000 tonnes, of construction and demolition waste in 2006-07³.

Much of our waste is landfilled. In 2007 623,179 tonnes⁴ of resources were effectively thrown away and ignored. This cost about £50 Million to the local economy but if we provide enough facilities we can, recycle this and turn it into a resource. We can reduce landfilling to the absolute minimum. This would not only reduce the harmful effects of what we currently do but save resources for the future. The Waste Core Strategy will be one of the catalysts for this change.

The Waste Core Strategy will put in place the policy framework to enable a change to happen. It will make sure that there are **sufficient opportunities for new waste management facilities of the right type, in the right place and at the right time** to deal with the waste produced in Worcestershire. It will not set out how you must deal with your waste or where you must take it but it will make sure that there are sufficient opportunities for the waste management industry to be able to develop all of the facilities necessary to address all of the current and predicted future waste arisings in the county up to 2027.

Many of you have already been involved and we thank you for your valuable ideas so far. We invite you to help us further by commenting on our ideas in the **Emerging Preferred Options Consultation for the Waste Core Strategy for Worcestershire**. The Emerging Preferred Options Consultation builds on earlier consultation work, particularly last year's 'Refreshed Issues and Options Report'. We want the consultation to promote further discussion about how many waste management facilities, and what kind, we need and how, and broadly where they should be developed to manage all of our wastes.

The purpose of the summary is to highlight the main elements of the Emerging Preferred Options Consultation. The full document for the Emerging Preferred Options Consultation and supporting documents are available at libraries, council office and on our website www.worcestershire.gov.uk/wcs or can be requested from Nicholas Dean on 01905 766374.

The consultation is intended to stimulate comment and discussion. It sets out the direction we wish to travel in and the scale of the issues we need to address. It does not represent our final views, only our current thinking.

The consultation starts on Monday 16th November 2009 and runs until Thursday 4th February 2010. Please feel free to suggest alternative ideas or evidence that you think we should consider. Equally, feel free to question aspects of it, even if you do not feel able to suggest anything positive. All contributions of any kind will be welcome.

¹ DEFRA

² Environment Agency

³ West Midlands Regional Planning Body

⁴ Environment Agency

Vision and objectives

The vision driving the Waste Core Strategy is that:

“By 2027, waste production in Worcestershire will be minimised and what is produced will be regarded as a source of useful material, to be treated so far as possible in Worcestershire itself, in accordance with the principles of sustainable development.”

To be useful, however, that vision cannot be restricted to a single statement. It must be a philosophy that guides us and it must encompass all of the following:

1. Waste minimisation will be our priority. The issue is no longer one of waste disposal but of resource management. The management of waste as a way of saving scarce resources is always something to be encouraged.
2. We need a change of attitude, not only a recognition that waste management is essential to the economy, but also as something which is just another business activity and not something automatically to be regarded as a bad neighbour.
3. There will be significantly more waste management capacity and facilities of different kinds and sizes than there are now.
4. There will be very little material that cannot be recycled. What cannot be recycled will mostly be used to generate useful benefits, such as for energy recovery or as fuel. Only as a last resort will it be landfilled.
5. Waste management must be resource efficient, and not create pollution, damage natural or cultural assets or unacceptably affect the health or amenities of local people.
6. Waste management is a dynamic, constantly changing activity, part of a network of symbiotic activities both within Worcestershire and the West Midlands. The network of waste facilities in the county and the individual components within it, must be capable of constant adjustment to address changes in the nature of business activity and technology within the wider economy up to 2027 and beyond. Our key word must be flexibility.
7. For business, waste will mean opportunity. For councils it will mean encouraging new waste management facilities.
8. Momentum is gathering to make the West Midlands a zero waste region. We should be prepared for this to be our long term goal.

All these mean that we must all take responsibility for what waste we produce and what we do with it. They also mean that we should look to making a high provision for waste management; if we do anything less, we will make it difficult for the industry to get the planning permission it needs and we will not achieve our vision.

The **vision** will give us a sense of direction but it needs to be worked up into more detailed **objectives**, to direct what policies we need so it can be realised:

- WO1 To base our decisions on the principles of sustainable development and the need to reduce and mitigate the causes of climate change to guide decisions
- WO2 To do everything possible to minimise waste production
- WO3 To address the 'capacity gap' between how much waste management capacity we have and what we need

- WO4 To make implementing the Waste Hierarchy the basis for waste management in Worcestershire
- WO5 To make communities in Worcestershire take responsibility for their own waste
- WO6 To reduce the transportation of waste by road where possible
- WO7 To ensure that the waste implications of all new development in Worcestershire are taken into account
- WO8 To safeguard existing waste management facilities from incompatible development
- WO9 To involve all those affected as openly and effectively as possible
- WO10 To monitor the effects of the Waste Core Strategy and revise it accordingly as circumstances change.

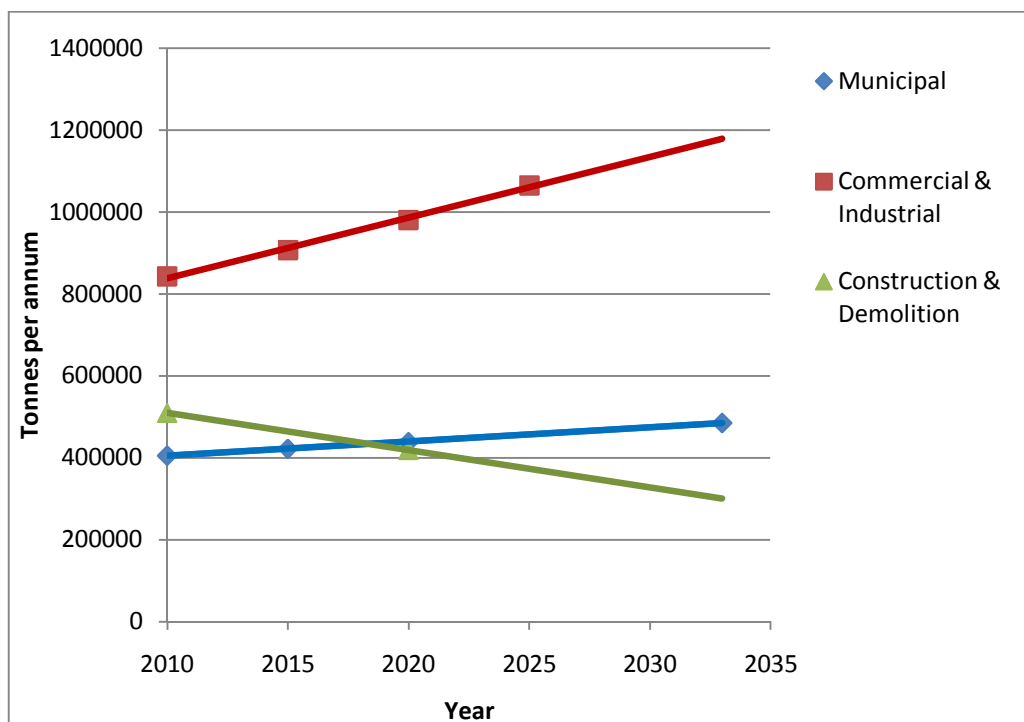
It is the council's intention to keep the objectives under long-term review. Their value will be assessed as part of the monitoring programme for the Waste Core Strategy.

Waste arisings, growth estimates and additional capacity requirements

The strategy predicts how much waste is likely to arise during the period up to 2027 and how much capacity will be needed to manage it and when. Because these estimates and the nature and source of the wastes produced and the technologies to manage them are all likely to change, the strategy will be flexible. It will identify a range of different kinds of locations and enable different kinds of technologies to deal with it. Where the strategy cannot be precise or specific, it will set out possible future directions and timescales to enable everyone to make the most of whatever opportunities or circumstances emerge. However, it will make sure that, whatever decisions are made, the priorities are always the protection of human health and the environment.

How much waste we need to manage is fundamental to the strategy. The strategy has developed a set of methods for making projections; these are summarised in Figure 1 below:

Figure 1: Predicted waste arisings



Note: Figures for commercial & industrial waste and construction & demolition waste for Worcestershire. Figures for municipal waste based on Worcestershire and Herefordshire due to the nature of the Joint Municipal Waste Management Contract.

In 2007, hazardous waste arisings were 49,761.26 tonnes and are not expected to increase. We estimate that arisings of non-natural agricultural waste were 3,487 tonnes in 2003 and are not likely to increase.

We estimate that clinical waste arisings are about 1,000tpa, including low level radioactive waste (from x-rays, dentists, veterinary surgeons) which we estimate to be less than 10m³ or 10kg pa. We estimate that this will increase at the same rate as the population.

Different parts of the county produce different amounts of waste. Fig. 2 on the next page shows how this can vary. (Lower Super Output Areas are areas used for census purposes; C and I are Commercial and Industrial waste arisings).

Existing facilities

There are already over 90 waste management facilities in Worcestershire. Between them they carry out most of the conventional methods of waste management (storing, sorting, breaking up, crushing, separating, composting, chemically treating, incinerating, transporting and landfilling) and manage a very wide range of materials. Their locations are shown on figure 3 below:

We anticipate that waste arisings in the County are likely to increase over the life of the Strategy; it is inevitable therefore that we will need more waste management facilities in the county. How we intend to approach this is set out below.

Figure 2: Waste arisings Worcestershire 2007

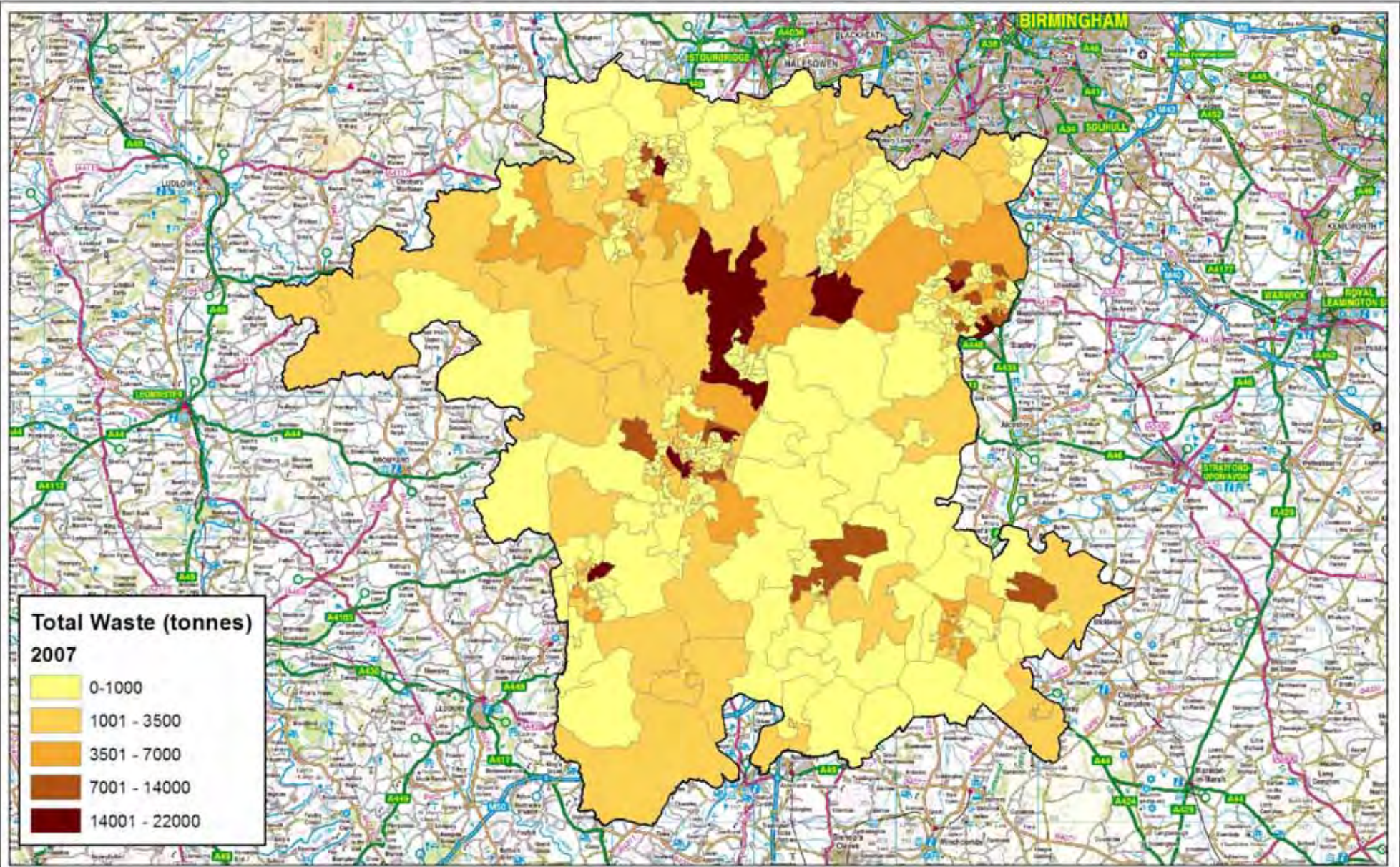
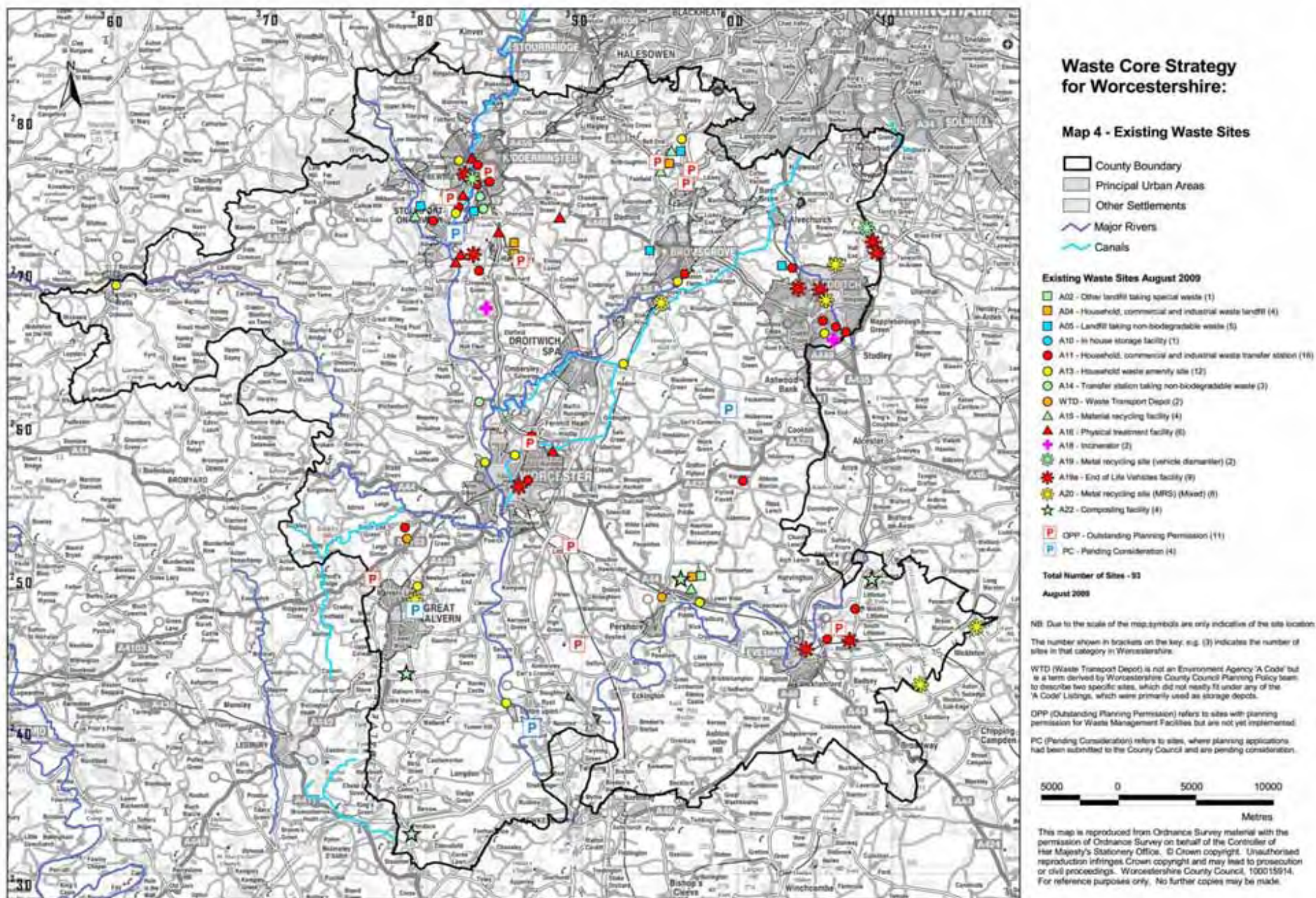


Figure 3: Existing waste management facilities in Worcestershire (May 2009)

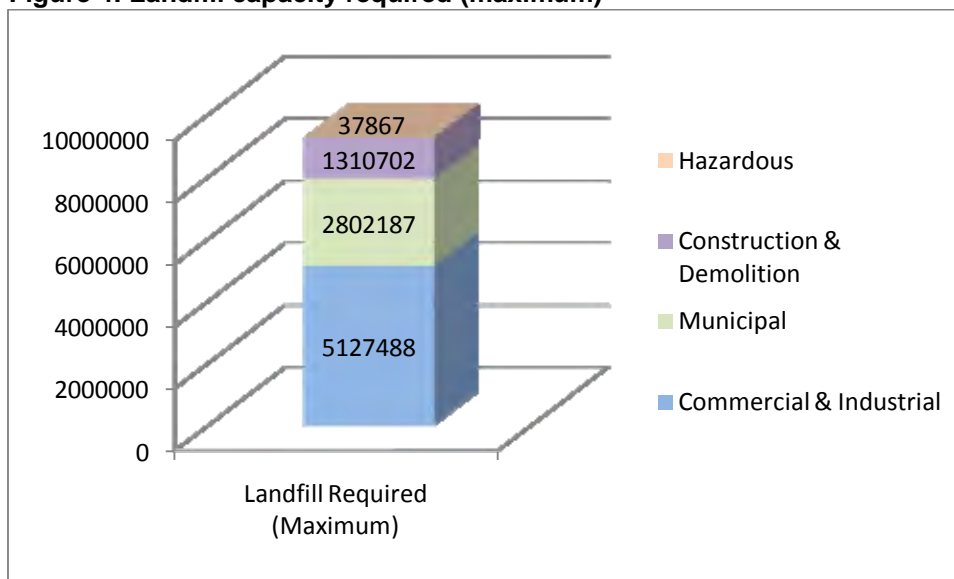


Additional capacity

We believe that the following capacity will be needed to manage all the waste in Worcestershire over the lifetime of the WCS:

- *Household waste recycling site*: At least one in each of the principal and market towns in the county
- *Waste transfer stations*: Additional capacity of 300,000 tonnes per annum
- *Material reclamation facilities*: Capacity to manage at least 108,500tpa of municipal waste
- *Thermal treatment capacity*: To treat up to 250,000tpa of municipal waste by 2034
- *Composting or anaerobic digestion (AD) capacity*: For at least 25,000tpa of municipal waste if the existing site at Hill & Moor closes. Additional capacity between 58,900 and 91,300tpa of biodegradable commercial and industrial waste by 2027.
- *Landfill capacity*: For the following (maximum) cumulative tonnages between 2007–27. We are developing estimates that suggest we have sufficient landfill capacity to meet the landfill requirement to + or - two years of 2027. We intend to clarify when this capacity will be exhausted by undertaking focused consultations in 2010 and to propose options as to how and when we need to consider what capacity we need and what the alternatives may be.

Figure 4: Landfill capacity required (maximum)



- *Other facilities*: We will not make special provision for any greater capacity of hazardous waste or waste metal treatment but will develop policies which would enable permission to be granted for such facilities should any applications be made.

How much land do we need?

On average, waste facilities need about one hectare to process 50,000tpa, on this basis, our initial estimate is that we will need 30 hectares of land from 2007-27.

We have already granted planning permission to manage about 700,00tpa (although these have not yet been implemented) and many of the existing waste facilities in Worcestershire process waste on smaller sites than this. It is likely therefore that we may only have to identify about 15 hectares of land for new waste facilities up to 2027.

Broad areas for waste management facilities

Our preferred approach is to identify a hierarchy of broad areas for waste management facilities to be located at:

- Worcester and its expansion areas
- Redditch and its expansion areas
- Kidderminster, Bromsgrove, Droitwich and the Central Technology Belt
- The major market towns: Evesham, Stourport and Bewdley
- Tenbury
- Pershore and Upton
- Limited rural development where the proximity to waste streams justifies it.

National and regional policy and the proposed Strategy Objective WL02 are that waste management facilities should be located as close to arisings as possible. We are looking to develop an approach that reflects this, based on existing waste arisings and proposed new areas of employment land.

Where should new waste management facilities be permitted?

National and regional policy set out clear requirements. Locations for new waste management facilities should be based on:

- Ensuring a range of sites of different size and geographical distribution
- Good accessibility to the source of waste arisings and/or end users
- Good transport connections including, where possible, rail or water.

In the first instance, such sites should be either:

- Sites with current use rights for waste management purposes
- Active mineral working sites or landfills where the proposal is both operationally related to the permitted use and for a temporary period commensurate with the permitted use of the site
- Previous or existing industrial land
- Contaminated or derelict land
- Land within or adjoining a sewage treatment works, or
- Redundant agricultural or forestry buildings and their curtilage.

The assumption is also that they will not be on open ground, including the greenbelt unless further criteria are complied with.

We intend to prepare options which would explore developing most new facilities on existing and future industrial estates. The single exception to this is likely to be proposals for windrow (i.e open air) composting.

Proposed policies

We have set out broad ideas for the policies we think would make it possible to achieve the strategy.

It is government policy that the Strategies should not repeat national or regional policy, so all of the proposals must be seen in context of those policies and of how they will be applied, namely:

- New development will be assessed against all relevant national and regional policies

- New development will also be assessed against all relevant policies in the final Waste Core Strategy and will be expected to conform with them unless material planning considerations dictate otherwise
- The Waste Core Strategy should be read as a whole; individual policies need to be seen in context, not interpreted in isolation
- The policies are not listed in priority order
- Where a policy contains a list of criteria, factors or proposals, these are not in any order or priority unless the policy specifically states that they are.

Ensuring sustainable development

We think that the strategy should focus on identifying locations where facilities can be developed rather than prescribing the technologies to be used. We think that the best ways we can minimise and monitor the impacts of waste management in Worcestershire on climate change will be to:

- Encourage waste minimisation
- Focus on carbon reduction
- Enable the efficient use and reuse of resources
- Encourage sustainable energy use
- Reduce traffic movement
- Require these to be incorporated in the designs of facilities.

We have to accept, however, that these may not be practicable for some small scale proposals. Some issues are also only partly under our control.

We can, however, contribute to reducing greenhouse gas emissions by policies that:

- Require landfill gas collection and management systems and, where practicable, to generate electricity
- Identify suitable locations for biodegradable waste streams to be diverted from landfill, to reduce methane emissions
- Encourage recyclables to be sorted and processed close to where they are produced
- Protect , maintain and seek to regenerate carbon sinks, notably woodland
- Encourage energy generation from waste and developments that enable fossil fuels to be replaced by carbon derived fuels
- Safeguard existing facilities.

We think therefore that we need to develop a policy that sets out how we could ensure sustainable development in a wider sense than just reducing energy use.

Draft Policy Direction WCS1: Ensuring sustainable development

We think that the Waste Core Strategy should require that:

Proposals for waste management related development must contribute to the delivery of sustainable development in Worcestershire by ensuring that the social economic and environmental impacts of waste management, including cross boundary and cumulative impacts, are kept to an acceptable minimum.

We think that any such policy could include how proposals for waste management related development will be assessed using criteria, and that these could include:

The extent to which the proposal:

- Contributes to, or mitigates, or will be able to adapt to, the anticipated adverse effects of climate change
- Implements the principles of the Waste Hierarchy to foster higher end uses and maximises the use of waste materials as a resource
- Is based on the best available information
- Is in accordance with national, regional and local planning policies.

Such criteria could include requirements to show that:

- Energy management, environmental performance and carbon reduction have been determining design features
- The location will minimise the 'waste miles' involved'
- Developments with a gross floor space of more than a certain size (e.g. 1000 sq m) gain at least 10% (or more, if local targets are higher) of energy supply annually, from renewable energy supplies (unless it can be demonstrated that this would not be feasible or viable, or the development is part of an integrated process for reducing greenhouse gas emissions or for carbon offsetting measures)
- Where appropriate, the landscaping or restoration proposals have a role in combating the adverse effects of climate change
- Where practicable, construction minimises the use of planning materials and maximises the use of recycled/reused materials.

Do you think that this would be a useful basis on which to develop a policy? (See Questionnaire).

Achieving a Spatial hierarchy

Objective WO6 is to:

"Make communities in Worcestershire take responsibility for their own waste".

We think that we should expressly state our commitment to this and explain the spatial implications for Worcestershire. Our aim is to address the waste

management implications of the Regional Spatial Strategy (RSS) for the West Midlands and to develop facilities as close as possible to the source of current and future arisings.

Do you think that this would be a useful basis on which to develop a policy? (See Questionnaire).

What kind of facilities would be suitable and where?

It is government policy that core strategies should not normally prescribe the waste management techniques or technologies to be used, but should rather identify what type or types of facility would be appropriately located on a site.

What alternatives have we considered?

We think that three broad approaches are possible, to categorise sites by:

- Size
- Broad kind
- Specific type.

Which of these methods do you think we should use? (See Questionnaire)

Future waste site allocations

We think that we need a policy to set out where what kind of development will broadly be located. where.

Draft Policy Direction: WCS2: Spatial hierarchy

Over the period up to 2027, sufficient sites will be identified or safeguarded to meet the RSS sub-regional apportionment to divert municipal solid waste (MSW) and construction (C) and industrial (I) waste away from landfill for Worcestershire and that the policy should set out where the Waste Core Strategy will provide sites in accordance with the following order of priority:

- The Settlements of Significant Development of Worcester and Redditch
- The growth and regeneration of Kidderminster, Bromsgrove and Droitwich
- The Central Technology Belt between and including Longbridge and Malvern
- The market towns of Evesham, Bewdley and Stourport
- Tenbury, Pershore and Upton
- The rural regeneration zone; and other rural areas

Draft Policy Direction: WCS3: Future waste site allocations

We think that we need a policy that sets out where the different kinds of waste management facility would be acceptable.

We think that the best way of doing this would be to develop a 'key diagram' which shows, in broad terms and on a map base, where new waste management facilities will be permitted. Potential developers would therefore be able to apply for planning permission with some confidence, subject to the need to assess the effect of the specific proposal on a particular site.

We think that it should make special protection for the Cotswolds and Malvern AONBs.

In the interests of sustainable development, we think a policy also needs to demonstrate a commitment to using the most appropriate transport routes within and around the county and to implement sustainable modes and methods of transportation. We also think that we also need to allow some waste, such as construction (C) and demolition (D), to be treated where it is produced – subject to the proposal being time limited to the development itself and being environmentally acceptable. It will not be possible to propose where such proposals would be acceptable on a map.

Do you think that this would be a useful basis on which to develop a policy? (See Questionnaire).

Unallocated sites

We intend to identify broad locations for new facilities but we do not think that it would be realistic to plan for a close fit between what we think is needed and sites – we need to be flexible.

We think that we need to provide a decision-making framework to manage and enable market flexibility. We also need to promote the development of waste facilities where there will be significant, but currently undefined, new industrial and housing development. We anticipate that such development will be set out in future district council development plans, but we need to prepare how to deal with the possible waste implications of such development in advance.

We think we need a policy that will enable proposals to develop waste facilities on sites that we were not aware of when we adopted the plan.

Draft Policy Direction: WCS 4: Unallocated sites

We think such a policy would include that proposals for the waste management related development on sites not identified in the Waste Core Strategy could be permitted where they met certain criteria such as that:

- They are consistent with the appropriate waste planning policies and objectives
- They are compatible with moving the management of waste up the Waste Hierarchy
- They do not compromise the achievement of the strategy.

They are at least as sustainable as the sites we identify in the key diagram and are supported by an independent Sustainability Appraisal/Strategy Environmental Assessment (SA/SEA) and other relevant assessments. We think that any such SA/SEA should include a full consideration of the appropriate alternative sites and the implications for protected species, habitats and features of the proposal, and that they are on sites that comply with national and regional policy (e.g. with existing permission for waste management related uses or on previously developed land or redundant agricultural or forestry buildings). We need to make provision that greenfield sites may be acceptable, provided that the proposal does not result in significant adverse impact on the countryside or its functions and that proposals would be compatible with their setting and would not have unacceptable direct or indirect impacts on matters of acknowledged importance in national, regional or local policy. And that they

Do you think that this would be a useful basis on which to develop a policy? (See Questionnaire).

How much waste management capacity do we need?

We need to "provide sufficient opportunities for new waste management facilities of the right type in the right place at the right time".⁵ We think that it would be useful to have a policy that sets this out.

Draft Policy Direction: WCS5: How much waste treatment capacity do we need?

On the basis of our proposals above, such a policy would require that sufficient waste management capacity will be provided in Worcestershire before 2027 to manage the equivalent of the waste arisings within the county.

For MSW: this would be:

Reducing the volumes of MSW produced per head in Worcestershire to the following:

Kg per household	Current level	Target 2010	Target 2015	Target 2020
	849	572	524	443

and achieving national/recycling composting levels of household waste of:

- 40% by 31st March 2010
- 45% by 31st March 2015

with a local target of:

- 43% before 31st March 2014 (and a commitment to review its ability to meet the 2015 target then) and
- 50% by 31st March 2020;
 - recovering value from a minimum of 78% of MSW;
 - reducing the amount of biodegradable MSW landfilled to
 - 154,164 tonnes during April 2009-March 2010
 - 102,684 tonnes during April 2012-March 2013
 - 71,851 tonnes during April 2019-March 2020.

For commercial and industrial waste: This would mean reducing the percentage landfilled to 25% of the total or less, by providing and safeguarding sufficient facilities to achieve the following targets:

2010/11		2015/16		2020/21		2025/26		2035/36	
Min Diversio n from Landfill	Max Landfill	Min Diversio n from Landfill	Max Landfill	Min Diversio n from Landfill	Max Landfill	Min Diversio n from Landfill	Max Landfill	Min Diversio n from Landfill	Max Landfill
632,077	210,692	680,638	226,879	735,848	245,283	798,619	266,206	951,124	317,104
New Capacity Needed (tonnes)									
524,257		572,818		628,028		690,799		843,505	

For hazardous waste: By providing and safeguarding sufficient facilities to manage at least 49,000tpa in Worcestershire.

For construction and demolition Waste: By providing and safeguarding sufficient facilities to manage at least 510,000t pa by 2021

For waste transfer purposes: By providing and safeguarding sufficient capacity to match a ratio of 1tpa of transfer capacity to 3tpa of total management capacity in the county.

For Landfill: By safeguarding existing permitted void space, monitoring progress and developing policies and criteria to identify new sites at the end of the life of the strategy.

⁵ PPS10

Do you think that this would be a useful basis on which to develop a policy? (See Questionnaire).

Unimplemented permissions

There is a significant potential waste management capacity in current, but unimplemented, permissions in the county. There is a time limit on each by which it must be commenced. We anticipate, however, that most of these will be implemented and will therefore contribute to meeting the 'capacity gap'. There is a risk, however, that if we do not recognise these permissions we will overestimate how many sites we need to identify. We think that the solution will be to safeguard these sites until they are either implemented or can be judged to be no longer necessary for waste management purposes. This will have the effect of reducing the number of new sites we need to identify. We intend to monitor progress with such sites and adjust the capacity gap accordingly each December in our Waste and Minerals Annual Monitoring and to use our findings to judge decision-making accordingly.

Obtaining planning permission and identifying appropriate sites for waste management related development can be difficult. It is therefore necessary to ensure that operational sites, sites with planning permissions that have not yet been implemented and areas proposed for waste facilities are not compromised by inappropriate development in their proximity. We think that we need a specific policy to ensure that this does not happen, so that when we are consulted by district councils we have a basis for protecting waste sites.

Draft Policy Direction: WCS6: Safeguarding

We think that such a policy could state that proposals for defined kinds of development, within a defined distance on existing or proposed waste facility or site identified in the key diagram will be permitted, provided that:

- The operation of the waste management facility is not or would not be significantly affected, or
- The waste management facility, proposed or existing, is no longer required or is not suitably located in relation to its function or impacts and either that there is adequate and appropriate capacity in the county or in proximity to the waste now and in the future to manage the waste that the facility treats; or the existing facility can be relocated to a more suitable and equally sustainable location, or
- The development proposal would not suffer unacceptable impacts as a result of the operation of the waste facility.

The consequence being that, if the above criteria are not met, we will object to the proposal and will expect the district council to refuse it on the grounds that it would compromise the achievement of the Waste Core Strategy.

Do you think that this would be a useful basis on which to develop a policy? (See Questionnaire).

Waste reduction

We think that some increase in some waste streams is inevitable. Waste reduction is therefore of key importance. We need to help reduce the amount of waste produced at source.

We think that it would be useful to develop Preferred Options on the basis that:

- We specify that certain kinds of development should include facilities to enable their occupiers or users to reduce waste production and maximise opportunities to manage their waste
- We require proposals for such development to include a waste audit,

and that the following would be a useful way to do so:

Draft Policy Direction WCS7: Assessing the waste implications of new development

Proposals for the following:

- Developments of a certain size (e.g. ten or more houses or plots)
- Shopping or leisure facilities (e.g. with a floor space of 500 square metres or more)
- Business, industrial, distribution or storage development with a defined floor space (e.g. of 300 square metres or more)
- All other kinds of development with a defined floor space (e.g. of 500 square metres or more) must:
 - Include facilities for the occupiers to separate and store the wastes produced to enable other recycling or composting unless adequate provision exists already
 - Be accompanied by a waste audit which must include specifies details of, for example;
 - the type and volume of wastes likely to be produced during the construction of the site, including site clearance and the excavation of foundations
 - how such wastes will be reduced, re-used or recycled during the development process
 - how the pollution potential of such wastes will be minimised
 - how such wastes will be disposed o
 - how wastes produced during the occupation of the site will be managed to maximise their reuse, recycling, composting or use for energy recovery
 - how the landfilling of waste from the site will be minimised
 - how all such waste will be stored and transported.

Also, we will include a requirement that, for example, all other proposals for development requiring planning permission or prior notification under the Permitted Development Regulations will be required to show how wastes produced during the construction and use of the site will be managed.

Do you think that this would be a useful basis on which to develop a policy? (See Questionnaire).

What kind of facilities do we need?

There are many ways to manage waste. We have looked at:

- Specifying exactly what facilities we need
- Specifying the capacity that needs to be provided and leaving it to the market to decide how it wants to do so.

We do not think that the first is realistic. New technologies and new market opportunities will emerge during the life of the strategy and we do not want to frustrate them. We can identify some specific kinds of development that are likely and we think that it would be useful to set these out where we can and that it would be useful to have a policy to do so.

Draft Policy Direction WCS8: What kind of facilities do we need?

Such a policy would set out that sufficient types of facility and technology will be permitted to reflect and support the waste management needs of the economy of Worcestershire.

We could also specify that proposals will, however, be required to:

- Identify the kind and broad origin of the wastes to be managed
- Demonstrate that the wastes involved could not have been managed more sustainably by using a solution at a higher level of the Waste Hierarchy.

Where we can do so, however, we could state that these will include the facilities we have already identified. These will include at least the following:

- Thermal treatment capacity of at least 250,000tpa
- At least one household waste recycling site in the principal and market towns in the county
- Composting or anaerobic digestion capacity for at least 25,000tpa of MSW throughout the life of the strategy, and 50,000tpa of biodegradable C and I waste, and a number of smaller sites with a capacity of up to 6,000tpa to address primarily rural sources of biodegradable material
- Capacity to manage at least 108,500tpa of MSW at a materials reclamation facility;
- Other types and sizes of facilities to enable the targets in this strategy to be met.

Do you think that this would be a useful basis on which to develop a policy? (See Questionnaire).

Special kinds of waste management facilities

In general, we think that most kinds of facility and technology should be addressed generally in terms of their impact rather than what they are. Some kinds of facility do however have specific characteristics which justify special consideration. We think that policies for energy from waste and landfill facilities would be useful.

Landfill

It is government policy to minimise the amount of waste landfilled and regional policy to restrict the granting of new planning permissions for landfilling (the term includes landraising for waste disposal purposes).

We believe that we may have enough landfill capacity to meet the county's needs during the life of the strategy but that there are some uncertainties in this regard and that the creation of sufficient voidspace will depend upon the scale of other development in the county. It is clear, however, that we will need additional landfill space in the county beyond the life of the strategy. We think therefore that we need to develop Preferred Options which generally limit the development of future landfill space but make it possible to do so if circumstances dictate and, in particular, that

we need to assess whether we need, and if the geology would enable, cells for stabilised non-reactive hazardous waste in Worcestershire.

Draft Policy Direction WCS9: Landfill

Such a policy could specify that no further planning permissions for non-inert landfill sites will be granted unless certain provisions are met. These could include that:

- There is clear evidence that there will be a shortfall during the life of the strategy
- There is no suitable waste management option at a higher level in the waste hierarchy in Worcestershire for the wastes proposed to be landfilled, or
- That the proposal is essential for operational reasons and is the only demonstrable option.

We would, however, also need provisions that planning permission will be granted for new inert landfill sites where justified. We think that possible justifications could be that:

- It can be demonstrated that the waste cannot be managed in a more sustainable way but special provisions would be needed to ensure that the proposal would comply with the objectives of the Worcestershire Biodiversity or Geodiversity Action Plan or the county Landscape Appraisal and would improve in the opinions of the relevant statutory body:
 - The setting or condition of any protected features nearby (e.g. of historic, archaeological or cultural value or nature conservation value), or
 - Surface water or groundwater conditions or flood management, or
 - The viability of any agricultural or forestry unit involved, or
 - The landscape character of the land or, if it were appropriate, that it could be argued the proposal is essential for operational reasons or the restoration of brownfield or derelict land or a minerals site. We think that in such cases we would want evidence that it was nonetheless the best demonstrable option and in all cases we think that we should require that adequate provision is made for the management of landfill gas to maximise the amount of energy produced.

Do you think that this would be a useful basis on which to develop a policy? (See Questionnaire).

Energy from waste

Waste Strategy 2007 notes that the recovery of energy from waste has been held back by public fears over alleged health effects and fears that the development of suitable infrastructure would lock in wastes which could otherwise be recycled. It is however quite clear that:

"Research carried out to date shows no credible evidence of adverse health outcomes for those living near incinerators...the available research demonstrates an absence of symptoms relating to exposures 20 or more years ago when emissions from incinerators were much greater than they are now..." (p77) and;

"Evidence from neighbouring countries, where very high rates of recycling and energy from waste are able to coexist, demonstrate that a vigorous energy from waste policy is compatible with high recycling rates" (p78).

We think that energy from waste could be a useful part of the strategy, provided that safeguards are in place to ensure that energy from waste proposals do not crowd out recycling and that the special issues relating to it, such as potential pollution and health risks, are properly addressed by the statutory bodies responsible. A possible policy could be:

Draft Policy Direction WCS10: Energy from waste

Any such policy would need to specify that planning Permission will be granted for energy from waste proposals, provided that it was basically sustainable. We would need to set criteria to require at least that:

- The sorting of waste is carried out
- Energy recovery is maximised
- Value recovery from by-products is maximised.

We would also need to ensure that residues can be satisfactorily managed and disposed of and the statutory health protection and pollution control bodies are satisfied that the proposals are acceptable.

Do you think that this would be a useful basis on which to develop a policy? (See Questionnaire).

Determination of planning applications

One of the main purposes of the Waste Core Strategy is to set out how sites will be assessed and applications for planning permission for waste management related development will be determined. We think that there may be a need for 'development management' policies in the strategy to ensure that:

- Measures are incorporated into proposals to mitigate the environmental impacts of waste management and transportation
- Policies help to protect local features, designated sites and areas and matters of local concern.

This is difficult to achieve. We have set out a list of issues to show attention to specific issues; we would value your opinions on whether it would be useful to include any such policy and whether these are the kinds of matter we should include.

We think that it would be useful to list these in fairly broad terms so that the issues that matter are drawn to everyone's attention at the outset. We can use this to refer to specific documents and strategies that are not specified in national or regional policies and that these will enable the "local distinctiveness" prescribed in national policy.

Draft Policy Direction: WCS 11: Managing the impact of waste management related development

We think that such a policy could state that proposals for waste management related development in Worcestershire will be permitted where they do not have unacceptable impacts on the natural resources (e.g. air, water and soil) and environmental and social, cultural or economic assets of Worcestershire. We think that it might be useful in this context to require that proposals accord with local policies (which will generally include requirements for enhancement where possible). This would make the policy 'locally distinctive'. We think that these could be listed. We are aware of the following:

- The need to protect the Bredon Hill, Lypett Grange Ponds, Dixon Wood, Fens Pools, River Wye/Afon Gwy, Walmore Common and Severn Estuary SAC/SPA and RAMSAR sites, the SSSIs in and adjoining the county and protected species associated with them
- The Worcestershire Biodiversity Action Plan and Regional Landscapes for Living concept; the Worcestershire Geodiversity Action Plan; the Cotswolds and Malvern Hills AONB's Management Plans and that we should refer to the need to protect the distinctive character and setting of historic and archaeological features and settlements in Worcestershire in accordance with current and future Historic Environment Planning Policy.

We could list the following:

- The Worcestershire Landscape Character Assessment principles
- The County Woodland Guidelines
- The Worcestershire Economic Development Strategy
- The Strategic Flood Risk Assessments and Water Strategies undertaken for Worcestershire
- The Catchment Management Plans and associated surface and groundwater protection and flood management policies undertaken by the Environment Agency for water catchments in, or potentially affecting or affected by, developments in Worcestershire.

Do you agree? See Questionnaire.

Other matters of concern

We think that there are also a number of other matters which are not explicitly dealt with in government policy, which the final Waste Core Strategy could usefully address. The issues we think could be important are:

- The restoration and after-care of waste sites;
 - Control of landfill mining;
 - Control of 'landscaping' and 'noise mounds'
 - Prescription of what councils in Worcestershire should require in connection with waste deposited under Permitted Development (PD) rights
 - Clarification of a county-wide approach to local recyclable collection points.
- Do you agree? See Questionnaire.

The Emerging Preferred Options report is supported by a set of background evidence documents which are set out on our website www.worcestershire.gov.uk/wcs We welcome any comments you would like to make on them.

Making your comments

The consultation started on Monday 16th November 2009 and runs until Thursday 4th February 2010. We would value any comments you would like to make on the Emerging Preferred Options report and the background evidence.

It would be helpful if you could use the questionnaire, which can be used on line or printed from our website www.worcestershire.gov.uk/wcs but all responses will be accepted, in any form.

Please send your response and direct any questions you have on the Emerging Preferred Options, the background papers or the consultation to:

N Dean
Planning, Environment and Economy
County Hall
Spetchley Road
Worcester
WR5 2NP

wcs@worcestershire.gov.uk

We will publish summaries of the responses we get and how we intend to use them on our website in the spring of 2010. Everyone who responds will be informed when these are available.

Thank you.