

Waste Core Strategy

for Worcestershire

ADDENDUM TO THE SUBMISSION DOCUMENT



Worcestershire Waste Core Strategy Development Plan Document

This addendum sets out changes to the Submission Document and should be read alongside it.

October 2011

Addendum to the Waste Core Strategy Submission Document

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Introduction

On 30th June 2011, Council resolved that the Waste Core Strategy and supporting documents be approved for formal submission to the Secretary of State for independent examination. Since this time we have been negotiating with a number of consultees who submitted representations on the soundness and legal compliance of the Waste Core Strategy during the Publication Document (Regulation 27) consultation which was held from March to May 2011, to try to resolve issues before the Examination.

These negotiations revealed that it would be in the council's best interests in seeking to ensure that the plan is sound to carry out a further Habitats Regulations Assessment to ensure legal compliance with *The Conservation of Habitats and Species Regulations 2010*. This has been completed and it is necessary to consult on this document ("*Worcestershire County Council HRA Addendum*", *September 2011 (ERM)*) and the changes to the Waste Core Strategy which are required in light of it. This also gives the Council an opportunity to make a number of other changes to address the majority of the representations that were received or for clarification and to correct grammatical errors and other errors.

A separate *Sustainability Appraisal of the Waste Core Strategy Submission Document: Addendum* has been prepared to assess the implications of the changes to the Waste Core Strategy and is also available for comment.

Purpose and layout of the document

This *Addendum to the Waste Core Strategy Submission Document* sets out the changes that we think are necessary to address the issues relating to soundness and legal compliance that were raised during the consultation. The changes should be read alongside the *Waste Core Strategy Submission Document*. All paragraph numbers, figures or table references are to the Submission document. The changes are split into the following sections:

- Section A:** Focused changes – Following HRA addendum
- Section B:** Focused changes - Capacity gap and objective WO3
- Section C:** Changes for clarity or to correcting errors and omissions - Land availability
- Section D:** Changes for clarity or to correcting errors and omissions - Design and operation of development
- Section E:** Changes for clarity or to correcting errors and omissions - Local characteristics and Greenbelt
- Section F:** Changes for clarity or to correcting errors and omissions - Flood risk and water quality
- Section G:** Changes for clarity or to correcting errors and omissions – other issues
- Section H:** Changes to referencing
- Section I:** Corrections to spelling, grammar and other typographical errors

Deletion of text contained in the Submission document is indicated by **orange strike-through-text**. Insertion of new text is indicated by **blue text**.

Summary of the main changes

The main changes are set out in detail in the rest of the document but are summarised below:

Changes following HRA addendum

- Following consultation, it became apparent that part b of the policy *WCS 2: Other recovery* was unsatisfactory. This was a view supported by Natural England.
- Issues relating to the protection of internationally designated sites are now dealt with in policy *WCS7: Environmental assets* and tests to safeguard internationally designated sites are moved from *Policy WCS 2* into *Policy WCS 7*. The change makes the tests easier to follow and means that they apply to all types of waste management development, rather than just 'other recovery' as set out previously.
- Appendix 3 is updated to include additional areas around Bredon Hill SAC and Dixon Woods SAC where it could not be concluded that waste management development would have no Likely Significant Effects on the internationally designated sites. It also re-defines the area where the Likely Significant Effects of waste management development around Lyppard Grange Ponds SAC would be uncertain.
- The distinction between Worcester zone 1a and 1b is removed from the geographic hierarchy and Key Diagram. However the HRA modelling results are retained in Appendix 3, with *Policy WCS 7* explaining how they should be interpreted.

New evidence base: "Worcestershire Waste Core Strategy Habitats Regulations Assessment Addendum September 2011".

Capacity gap and objective WO3

- An error made in calculating the capacity gap for MWS re-use and recycling and recovery targets in the *Publication Document* is corrected. The capacity gap calculations were mistakenly based on 55% recycling for MSW rather than the 50% target set out in Objective WO3. The change to correct this error is consistent with the approach taken in the rest of the strategy and results in less than a 3% change to the overall capacity gap (2025/26).
- Targets in objective WO3 are re-formatted to make them clearer.
- The concept of zero-waste as a long-term aim has been re-introduced into objective WO3 and the implications are discussed in *Section 8: Implementation and monitoring framework*.

New evidence base: "Addendum to the Waste Core Strategy Background Document Arisings and capacity" (28th July 2011)

Land availability

- The *Publication Document* gave two different figures for hectares of suitable employment land currently available (42 and 34 hectares). 34 hectares is correct and changes are proposed to amend the error throughout.
- Additional information is also added in relation to employment land provision in the Regional Spatial Strategy.

Design and operation of development

- Following consultation, the concept that waste management facilities benefit wider energy demands was raised. The addendum acknowledges this, but maintains the stance that all proposals should also consider energy efficiency in individual facilities.

- The *Draft addendum* amends the caveat to *Policy WCS 11: Amenity*. Where the tests in the policy are not satisfied, the caveat previously required "exceptional circumstances" to be demonstrated to allow the development to be permitted; this was too stringent a test and not in line with national policy. The proposed change requires instead that the benefits of the development at the proposed site clearly outweigh any unacceptable adverse impacts.

Local characteristics and Greenbelt

- *Policy WCS 10: Local characteristics* has been split to consider green belt issues and local characteristics separately
- A caveat has been added to *Policy WCS 10: Local characteristics* to complement the caveats contained in other policies. The proposed change requires that the benefits of the development at the proposed site clearly outweigh any unacceptable adverse impacts on local characteristics or an AONB.
- The policy is amended so that the green belt criteria are in accordance with national policy.

Flood risk and water quality

- The supporting text in *Policy WCS 8: Flood risk and water resources* is expanded to include reference to facilities remaining safe and operational during flood events.
- Changes incorporate requirements contained in *The Waste (England and Wales) Regulations 2011*, regarding the consideration of impacts from planned or unplanned fires, and the distance of waste management development from surrounding uses.

Have your say

We are asking people for their comments on the 'soundness' of the Waste Core Strategy Submission Document **incorporating the Addendum**. To be 'sound' the Waste Core Strategy must be:

- ✓ Justified:
 - ✓ Founded on a robust and credible evidence base
 - ✓ The most appropriate strategy when considered against reasonable alternatives
- ✓ Effective:
 - ✓ Deliverable
 - ✓ Flexible
 - ✓ Able to be monitored
- ✓ Consistent with national policy
- ✓ Comply with the law.

The documents and a **response form** and **guidance notes** are available on our website www.worcestershire.gov.uk/wcs and in libraries and Worcestershire Hub customer centres. The response form can be completed online at www.worcestershire.gov.uk/wcs. Alternatively paper copies are available on request from Nick Dean at the address below.

The consultation runs from **3rd October to 5.30pm on 15th November 2011**. Any comments made after the closing date are unlikely to be considered by the Inspector when they assess the Strategy.

Following the consultation, and subject to approval at full council, this **Addendum** will be submitted to the Secretary of State with the Waste Core Strategy **Submission document**. This will be accompanied by the suite of background evidence, as well as

copies of the representations received during the Publication Document (Regulation 27) consultation and any representations received to consultation on the addendum.

The Secretary of State will then appoint a Planning Inspector to assess the 'soundness' and legal compliance of the strategy.

The *Waste Core Strategy Submission Document, Draft Addendum to the Waste Core Strategy* document and response form are available on our website www.worcestershire.gov.uk/wcs and in libraries and Worcestershire Hub customer centres. Alternatively paper copies are available on request from:

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Section A: Focused changes – Following HRA addendum

Change reference number	Change	Reason
A 1.	Change to Contents list: "... Appendix 3: Habitats Regulations Assessment Figures"	To reflect change to Appendix 3, see change A 15.
2. Spatial Portrait		
A 2.	Change to update text in Figure 13 (page 28): Figure 13 Level 1 a) and b) Kidderminster zone, Redditch zone, Worcester zones s-a and b Level 2 Bromsgrove zone, Droitwich Spa zone Level 3 Evesham zone, Malvern zone and Pershore zone Level 4 Bewdley zone, Tenbury Wells zone and Upton upon Severn zone Level 5 Other areas	<p>Following discussions with Natural England, it became apparent that further assessment was required as part of the Habitats Regulations Assessment (HRA). This was undertaken and is presented in "<i>Worcestershire Waste Core Strategy Habitats Regulations Assessment Addendum September 2011</i>".</p> <p>Taking this into account the HRA addendum, it was considered to be more appropriate to deal with issues relating to the HRA in policy WCS7, rather than through the Spatial Strategy.</p> <p>It is possible that developers may interpret the identification of Worcester zone 1b as meaning that development outside of these areas does not need to take account of likely significant effects on internationally designated sites. This definition is removed from the key diagram to avoid the potential</p>
A 3.	Change to Figure 14 (page 29) to reflect HRA: Removal of level 1b – Worcester zone b incorporated into Worcester zone a.	

Change reference number	Change	Reason
		<p>for confusion.</p> <p>However the HRA modelling results are retained in appendix 3, with WCS7 explaining how they should be interpreted.</p>
A 4.	<p>Change to Paragraph 2.60 and footnote 43 (page 31):</p> <p>"To recognise their scale and role, 'other recovery' facilities will only be enabled in upper levels of the geographic hierarchy. To reflect the findings of the Habitats Regulations Assessment (HRA), only smaller⁴³ 'other recovery' facilities will be enabled in Worcester zone b."</p> <p>Footnote 43: "With likely significant effects the same as or less than a thermal treatment facility with a throughput of 150,000 tonnes per annum and stack height of 80 metres."</p>	<p>Change made following discussions with Natural England and the HRA addendum, see reasons in A 2.</p> <p>The approach in the Publication Document sought to manage impacts on internationally designated sites by restricting the types of development that would be permitted in Worcester zone b. Following consultation, it became apparent that this was not a sound approach and may prove to be unworkable.</p> <p>The change sets out an approach which is more closely aligned with national policy and European regulations. It requires the impacts of development to be considered rather than restricting development entirely.</p>
3. Managing waste as a resource		
A 5.	<p>Change to Paragraph 3.7 (page 35):</p> <p>"The geographic hierarchy and spatial strategy are based on the consideration of:</p> <ul style="list-style-type: none"> • patterns of current and predicted future waste arisings⁴⁹, • patterns of current and predicted future resource demand⁵⁰, • onward treatment facilities⁵¹, • connections to the strategic transport network, • potential for future development of waste management facilities, • the Habitats Regulations Assessment, and 	<p>Following discussions with Natural England and taking into account the HRA addendum, it was considered to be more appropriate to deal with issues relating to the HRA in policy WCS7, rather than through the Spatial Strategy.</p>

Change reference number	Change	Reason
	<ul style="list-style-type: none"> • City, Borough and District Councils' Strategic Flood Risk Assessments. " 	<p>It is possible that developers may interpret the identification of Worcester zone 1b as meaning that development outside of these areas does not need to take account of likely significant effects on internationally designated sites. This definition is removed from the key diagram to avoid the potential for confusion.</p> <p>However the HRA modelling results are retained in appendix 3, with WCS7 explaining how they should be interpreted.</p>
A 6.	<p>Change to Paragraph 3.8 (page 35):</p> <p>"3.8 Justification for the proposed location in lower levels of the geographic hierarchy would need to reflect these considerations, and may include:</p> <ul style="list-style-type: none"> • Proximity to the producers of the waste to be managed, • Proximity to end users, • Proximity to other waste management facilities in the same treatment chain, • Proximity to synergistic development, enabling bulking, transfer and the use of reverse-logistics for the movement of material, or • Where heat or energy is produced, proximity to end users, heat distribution networks or grid connectionss, or • Lack of suitable sites at higher levels of the geographic hierarchy. <p>3.8a In all cases the justification must be clearly set out and where alternative sites have been considered, it would be useful to include details of any constraints considered in site screening activities as part of the application. This could take account of the constraints which are considered in other policies in the Waste Core Strategy, including environmental assets, flood risk, water resources, local characteristics or amenity. In the case of EIA development this assessment will form part of the Environmental Statement. "</p>	<p>Change made to improve clarity and to include an additional example of a potential justification.</p>
A 7.	<p>Change to Policy WCS2 (page 36):</p> <p>"POLICY WCS 2: Other recovery</p>	<p>Changes to part a)</p> <p>The changes improve</p>

Change reference number	Change	Reason
	<p>a) In order to achieve equivalent self-sufficiency in waste management and deliver the spatial strategy, proposals for 'other recovery'⁵³ facilities will only be permitted :- a)-where they demonstrate it is demonstrated that:</p> <ul style="list-style-type: none"> i. sorting of waste is carried out to optimise re-use and recycling; and ii. energy recovery is optimised; and iii. resource recovery from by-products is optimised and any residues can be satisfactorily managed and disposed of; and <p>b) In order to deliver the spatial strategy, proposals for 'other recovery' facilities will be permitted in levels 1 and 2 where it is demonstrated that the proposed location is at the highest appropriate level of the geographic hierarchy;</p> <p>c) Planning permission will not be granted for 'other recovery' facilities in zones 3, 4 or 5 except where it is demonstrated that</p> <ul style="list-style-type: none"> i. the proposed development cannot reasonably be located in levels 1 or 2 of the geographic hierarchy, and ii. the proposed location is at the highest appropriate level of the geographic hierarchy. <p>b)-where they are located at the highest appropriate level of the geographic hierarchy and it is demonstrated that:</p> <ul style="list-style-type: none"> i ——— in level 1a and level 2: <ul style="list-style-type: none"> • ——— the impact of emissions will be the same as or less than a thermal treatment facility with a throughput of 250,000 tpa and a stack height of 80 metres. ii ——— in level 1b: <ul style="list-style-type: none"> • ——— the impact of emissions will be the same as or less than a thermal treatment facility with a throughput of 150,000 tpa and a stack height of 80 metres. <p>'Other recovery' facilities will not be permitted in levels 3, 4 or 5 unless exceptional circumstances are clearly demonstrated. "</p>	<p>the clarity of the policy.</p> <p>Changes to part b)</p> <p>Changes made in response to 1679/49 e (Axis on behalf of Mercia Waste Management) and following discussions with Natural England. See <i>reasons</i> in reference A 2.</p> <p>Following consultation, it became apparent that this part of the policy was not sound and may prove to be unworkable. This was a view supported by Natural England.</p> <p>The policy was reviewed in consultation with Natural England and addition HRA modelling was undertaken.</p> <p>The changes remove the thresholds and the tests to safeguard internationally designated sites. Protection for these sites is contained in Policy WCS7 and the supporting text which draws attention to the zone previously identified as Worcester b.</p> <p>Addition of Part c)</p> <p>The test 'unless exceptional circumstances are clearly demonstrated' was considered to be inappropriate and not in line with national policy.</p> <p>Part c) sets out the circumstances in which development of 'other recovery' facilities in</p>

Change reference number	Change	Reason
		lower levels of the geographic hierarchy may be appropriate.
A 8.	<p>Change to Paragraph 3.16 – 3.19 (page 37):</p> <p><i>"Demonstrating that the proposal is located at the highest appropriate level of the geographic hierarchy Proposals for 'other recovery' facilities in levels 1 and 2 of the geographic hierarchy</i></p> <p>3.16 Many 'other recovery' facilities form a key part of wider waste management networks. To enable them to perform this role, 'other recovery' facilities will be directed to levels 1 and 2 of the geographic hierarchy. Figure 14. Key diagram shows the levels of the geographic hierarchy. It should be used by the applicant to identify which level of the geographic hierarchy the proposed site is located within.</p> <p>3.17 Level 1 is the highest level of the geographic hierarchy. If the proposed site is not in level 1 in level 2 of the geographic hierarchy, applicants should demonstrate why this is the highest appropriate level for the proposed development. that proposals are located at the highest appropriate level of the geographic hierarchy. This should set out the special considerations that justify why it is more suitable for the development to be located on the proposed site than in the geographic zones at higher levels in in level 1 of the geographic hierarchy. It should address each geographic zone. These would need to reflect the considerations of the geographic hierarchy (see paragraph 3.7), and may include:</p> <ul style="list-style-type: none"> • Proximity to the producers of the waste to be managed, • Proximity to end users, • Proximity to other waste management facilities in the same treatment chain, • Proximity to synergistic development, enabling bulking, transfer and the use of reverse-logistics for the movement of material, • Where heat or energy is produced, proximity to end users, heat distribution networks or grid connections, or • Lack of suitable sites at higher levels of the geographic hierarchy. <p>3.17 a In all cases the justification must be clearly set out and where alternative sites have been considered, it would be useful to include details of any constraints considered in site screening activities as part of the application. This could take account of the constraints which are considered in other policies in the Waste Core Strategy, including environmental assets, flood risk, water resources, local characteristics or amenity.</p> <p><i>Proposals for 'other recovery' facilities in levels 3, 4, and 5</i></p>	<p>The changes set out in more detail the requirements for 'other recovery' proposals in levels 1 and 2 and the additional requirements for proposals in levels 3, 4 and 5.</p> <p>This explanatory text reflects the changes made to policy WCS 2 (see B 12) and has been developed in consultation with Natural England.</p>

Change reference number	Change	Reason
	<p>3.17b Where 'other recovery' facilities are proposed in levels 3, 4 or 5 it will be necessary for all proposals to demonstrate that there are no suitable sites available at higher levels of the geographic hierarchy. This could take account of the constraints which are considered in other policies in the Waste Core Strategy, including environmental assets, flood risk, water resources, local characteristics or amenity. This will need to be based on robust evidence that is presented as part of the application.</p> <p>3.17c If it has been demonstrated that there are no suitable sites in levels 1 or 2 of the geographic hierarchy, developments in level 3 will be considered to be at the highest appropriate level of the geographic hierarchy.</p> <p>3.17d In addition to demonstrating that there are no suitable sites in level 1 or 2, proposals in levels 4 and 5 of the geographic hierarchy will also need to justify why the location is at the highest <u>appropriate</u> level. Justification for the proposed location in lower levels of the geographic hierarchy may include:</p> <ul style="list-style-type: none"> • Proximity to the producers of the waste to be managed, • Proximity to end users, • Proximity to other waste management facilities in the same treatment chain, • Proximity to synergistic development, enabling bulking, transfer and the use of reverse-logistics for the movement of material, • Where heat or energy is produced, proximity to end users, heat distribution networks or grid connections, or • Lack of suitable sites at higher levels of the geographic hierarchy. <p>3.17 e In all cases the justification must be clearly set out and where alternative sites have been considered, it would be useful to include details of any constraints considered in site screening activities as part of the application. This could take account of the constraints which are considered in other policies in the Waste Core Strategy, including environmental assets, flood risk, water resources, local characteristics or amenity.</p> <p>3.18—Further details in relation to this are set out in paragraphs 3.7 to 3.8 above.</p> <p>3.19—The scale of 'other recovery' facilities that are appropriate in level 1b is limited due to the findings of the Habitats Regulations Assessment, see Appendix 3. Limiting the scale of 'other recovery' facilities in Worcester zone b means that there should be no likely significant effects on the Lyppard Grange Ponds SAC. "</p>	

Change reference number	Change	Reason
A 9.	<p>Change to Policy WCS 7 (page 45):</p> <p>"POLICY WCS7: Environmental assets</p> <p>Proposals for waste management facilities:</p> <p>a) will be permitted where the location, design, operation, landscaping and restoration, In order to protect and where possible enhance, Internationally, Nationally and Locally designated sites, habitats, species and heritage assets-, proposals for waste management facilities will be permitted where:</p> <p>a) the proposal, including its location, design, operation, landscaping and/or restoration:</p> <p>i) b) will be permitted where they will have no adverse effects on the integrity of Internationally designated sites, either alone or in combination with other plans or projects; or is are necessary for the management of an Internationally [underline] designated site.</p> <p>c) will not be permitted where they will have a likely significant effect on Internationally designated sites, or an unacceptable adverse impact on International, National and Local designated sites, habitats, species and heritage assets. An assessment of likely impacts on these features must take into account:</p> <ul style="list-style-type: none"> — i. impacts both within and beyond the proposed site boundary; and — ii. impacts on the integrity of the site; and — iii. broader impacts that the proposal is likely to have on wider networks or populations; and — iv. any substantial harm to or loss of the significance of a heritage asset or its setting; and — v. any cumulative impacts; and — vi. any mitigation proposals. <p>Where it cannot be demonstrated that there are no likely significant effects on internationally designated sites, or no likely unacceptable adverse impacts on other environmental assets, proposals affecting:</p> <p>Where the proposed development would have adverse effects on the integrity of an Internationally designated site, development • international designations will only be permitted where justified by there are:</p> <ul style="list-style-type: none"> • no alternatives; and • imperative reasons of overriding public interest <p>and</p> <p>ii) will have no unacceptable adverse impacts on national and local environmental assets <small>NEW FOOTNOTE 1</small></p>	<p>Policy WCS7 addressed a number of issues and was felt to be overly complex. The original policy wording used terms such as 'likely significant effect' in the wrong context. These errors have now been corrected and the language used is more closely aligned to the <i>Conservation of Habitats and Species Regulations 2010</i>.</p> <p>The change acknowledges the different level of protection given to internationally designated sites and sets out the policy criteria for these sites separately. It also considers the issues of protection and enhancement separately.</p> <p>It moves more explanatory detail regarding the issues which should be considered when assessing likely impacts (originally part c) into the Explanatory text.</p> <p>These changes have been developed in consultation with Natural England.</p>

Change reference number	Change	Reason
	<p>Where the proposed development would have unacceptable adverse impacts on environmental assets, development national and local designations and assets will only be permitted where it is demonstrated that the benefits of the development at the proposed site clearly outweigh any unacceptable adverse impacts. Proportionate consideration will be given in accordance with their degree of protection.</p> <p>and</p> <p>b) the proposal, including its the design, landscaping and/or restoration enhance environmental assets^{NEW FOOTNOTE 2}, their settings and/or linkages between them.</p> <p>NEW FOOTNOTE 1: See Table 7. NEW FOOTNOTE 2: See Table 7.</p>	
A 10.	<p>Change to Paragraphs 5.6 – 5.7 (page 47):</p> <p>"Designated sites, habitats and species Protection of internationally designated sites</p> <p>5.6 Internationally, nationally and locally designated sites all play a role in preserving and enhancing biodiversity and geodiversity. These are given different degrees of protection through legislation and national policy. Assessment should be made of the likely impacts within and beyond the proposed development site.</p> <p>5.7 The following international sites have the potential to be affected by waste management development in Worcestershire⁶⁹:</p> <ul style="list-style-type: none"> • Bredon Hill SAC (Worcestershire) • Lyppard Grange Ponds SAC (Worcestershire) • Dixon Woods SAC (Gloucestershire) • Fens Pools SAC (Dudley) • River Wye/Afon Gwy SAC (Monmouthshire, Gloucestershire, Herefordshire, Powys) • Walmore Common SPA and Ramsar (Gloucestershire) • Severn Estuary SAC, SPA and Ramsar (Vale of Glamorgan, Cardiff, Newport, City of Bristol, Monmouthshire, Gloucestershire, North Somerset, Somerset, South Gloucestershire). <p>Developments affecting international sites must preserve their integrity and have no likely significant effects on the internationally important features of the site.</p> <p>5.7 a If a plan or project is not connected with, or necessary for the maintenance of an internationally designated site, and it is likely to have a significant effect, an "appropriate assessment" is required^{NEW FOOTNOTE} to</p>	<p>The original wording used terms such as 'likely significant effect' in the wrong context. These errors have now been corrected and the language used is more closely aligned to the <i>Conservation of Habitats and Species Regulations 2010</i> and the Waste Core Strategy Habitats Regulations Assessment and Addendum.</p> <p>The changes move explanatory detail regarding the issues which should be considered when assessing likely impacts from Policy WCS 7 into the explanatory text.</p> <p>The changes retains the policy aim of WCS2 as proposed in the publication document, ensuring that the likely impact of waste management development on internationally designated sites is</p>

Change reference number	Change	Reason
	<p>determine whether the proposal will have an adverse impact on the integrity of the site.</p> <p>5.7 b Modelling was undertaken as part of the Habitats Regulations Assessment of the Waste Core Strategy. The results (set out in appendix 3) identify those areas where it could not be concluded that there would be no likely significant effect from waste management development on internationally designated sites.</p> <p>The Waste Core Strategy is a high level plan which is not technology specific and does not make site allocations, therefore the modelling is based on broad assumptions. The results give an appropriate level of certainty for this type of plan and inform this policy. However the potential effects from individual waste management facilities will vary for each proposal and must still be assessed as part of the planning application.</p> <p>5.7c The identification of the areas in Appendix 3 does not mean that the development of a waste management facility cannot happen in these areas, but that development may be constrained. Equally it does not mean that development of a waste management facility outside of these areas will have no impact on internationally designated site and these issues should be considered where relevant.</p> <p>5.7d However due to the increased uncertainty relating to the impact of development within the areas identified in Appendix 3, proposals for waste management development in these areas should include sufficient information to enable a screening assessment of likely significant effects to be undertaken. This should take into account:</p> <ul style="list-style-type: none"> • key sensitivities of the internationally designated sites; and • impacts both within and beyond the site boundary of the proposed development; and • direct and in-direct effects; and • broader impacts that the proposal is likely to have on wider networks or populations, including the severing of links between dependant sites; and • any cumulative impacts; and • any mitigation proposals. <p>A screening assessment may also be required for development proposals outside of the areas identified in appendix 3, which are capable of affecting an internationally designated site. If the proposal is likely to have a significant effect, an 'appropriate assessment' will be required.</p> <p>NEW FOOTNOTE: "<i>The Conservation of Habitats and</i></p>	<p>given specific consideration in these areas identified in the HRA.</p> <p>These changes have been developed in consultation with Natural England.</p>

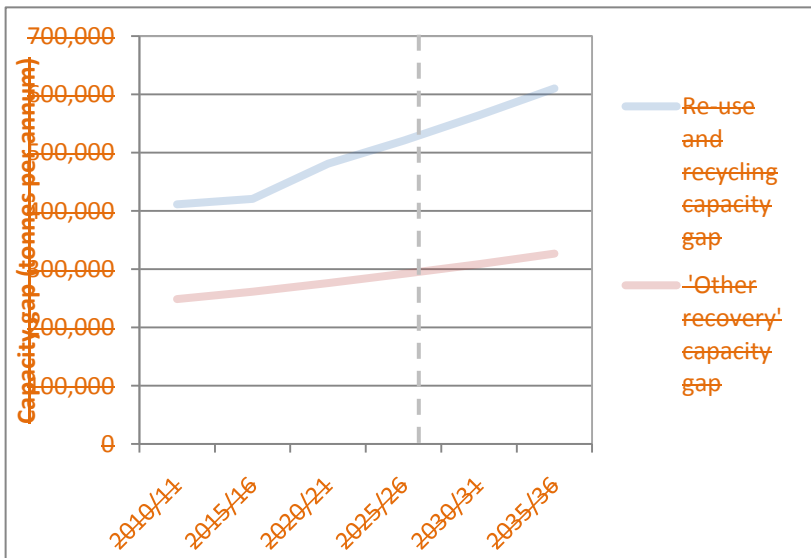
Change reference number	Change	Reason
	<i>Species Regulations 2010"</i>	
A 11.	<p>Change to Paragraph 5.8 (page 47):</p> <p><i>"Protection of national and local sites</i></p> <p>5.8 Internationally and nNationally designated and locally important sites⁷⁰ are important in themselves and can form networks of natural habitats providing routes or stepping stones for migration, dispersal and genetic exchange of species and provide biodiversity with an improved capacity to adapt to likely changes in climate. Both individual sites and networks of which they are part should be protected and where possible enhanced. [insert paragraph break]</p> <p>5.8a An assessment of likely impacts on national and local sites must take into account:</p> <ul style="list-style-type: none"> • impacts both within and beyond the site boundary of the proposed development; and • direct and in-direct effects; and • broader impacts that the proposal is likely to have on wider networks or populations, including the severing of links between dependant sites; and • any substantial harm to or loss of the significance of a heritage asset or its setting; and • any cumulative impacts; and • any mitigation proposals. <p>Worcestershire's Green Infrastructure Study, local Worcestershire Biodiversity Action Plan and Geodiversity Action Plan should inform the assessment."</p>	<p>The change acknowledges the different level of protection given to internationally designated sites.</p> <p>It moves explanatory detail regarding the issues which should be considered when assessing likely impacts from Policy WCS 7 into the explanatory text.</p> <p>These changes have been developed in consultation with Natural England.</p>
A 12.	<p>Change to Paragraph 5.9 – 5.10 (page 47):</p> <p><i>"Protection of international, national and local habitats and species</i></p> <p>5.9 — Landscaping or restoration proposals should incorporate beneficial biodiversity features as part of the design of the development and where relevant contribute to repairing the fragmentation of networks of biodiversity sites.</p> <p>5.9a The Worcestershire Biodiversity Action Plan (BAP) contains Action Plans for Worcestershire's key wildlife habitats and species. These have been chosen because of their threatened status or because important national strongholds occur in Worcestershire, or both. In addition Generic Action Plans are presented for common themes that permeate most aspects of biodiversity conservation in the county. Each plan gives an overview of the current status of the habitat or species within the county and identifies particular threats to it.</p> <p>5.10 Where proposals are likely to have a significant effect on species or habitats identified in Table 7, appropriate surveys should be carried out by a suitably qualified ecologist⁷¹ and</p>	<p>Change to improve clarity and provide applicants with further guidance.</p>

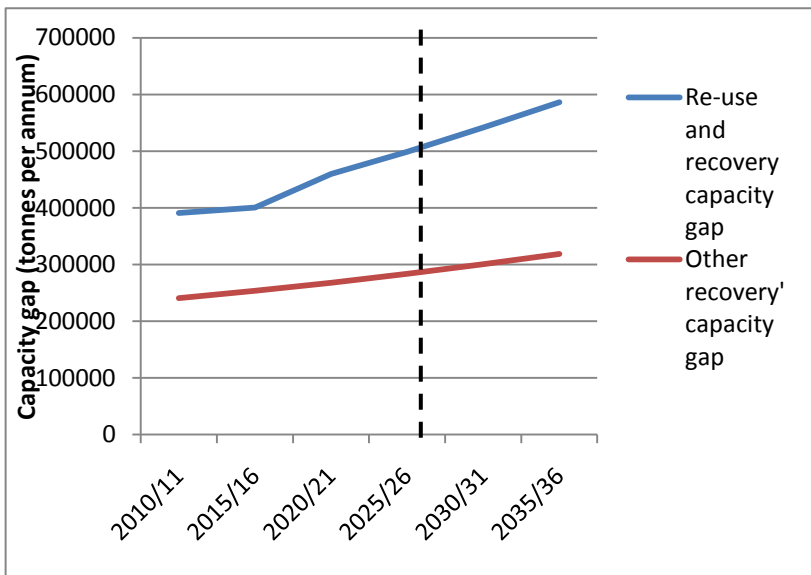
Change reference number	Change	Reason
	submitted with the application. These should be carried out in line with the requirements of legislation and best practice and take the <i>Worcestershire Habitat Inventory</i> into account. Advice relating to protected species is available from Natural England ^{NEW} FOOTNOTE 11 " "	
	NEW FOOTNOTE 11: www.naturalengland.org.uk	
A 13.	Change to Paragraph 5.11 (page 48): " Heritage assets Protection of international, national and local heritage assets 5.11 The historic environment encompasses the assets listed in Table 7 and their settings. Proposals likely to affect the significance of a heritage asset or its setting should be accompanied by an appropriate evaluation. This should be informed by the county's <i>Historic Environment Assessment</i> . For proposals likely to affect historic farm buildings, the products of the <i>West Midlands Farmsteads and Landscape Project</i> should be used including the <i>County's Farmsteads Character Statements</i> ⁷² ."	To improve clarity.
A 14.	Change, insert after Paragraph 5.11 (page 48): " Enhancement of Environmental Assets 5.11a The design, landscaping and restoration of waste management development can contribute positively to the environmental assets listed in Table 7 through incorporating beneficial features as part of the design of the development. The scale of enhancement possible will depend on the scale and nature of the proposed development. 5.11b For example, where the proposal involves landscaping of the site, proposals might include repairing networks of biodiversity sites or contributing to Worcestershire's Green Infrastructure Study and BAP targets for maintenance, restoration, expansion or creation of habitats. Where proposals are for the re-use of existing buildings other enhancement measures may be more relevant, such as the provision of bird, bat or bug boxes. 5.11c Enhancement of heritage assets may include improvements to the setting of listed buildings, conservation areas, vernacular or locally important features, creating new viewpoints or bringing historic assets back into use. "	The change provides guidance on the enhancement of environmental assets in line with the changes to Policy WCS 7 (see A 9). Enhancement formed part of the original policy wording but was not prominent in the explanatory text. The change addresses this issue.
A 15.	Change to Appendix 3: " <i>Appendix 3: Habitats Regulations Assessment Figures</i> s The Habitats Regulations Assessment's Figure 2.5 ^{NEW FOOTNOTE} shows the extent of the areas in which it could not be concluded from the findings of the air pollution assessment that there will be no likely significant effects from the development of waste management facilities. The nature and significance of any such effects will need to be determined by a site specific assessment in line with Policy WCS 7. on	Following discussions with Natural England, it became apparent that further assessment was required as part of the Habitats Regulations Assessment (HRA). This was undertaken and is presented in

Change reference number	Change	Reason
	<p>the Lyppard Grange ponds SAC from thermal treatment facilities at certain parameters are uncertain.</p> <p>The following figures informed the designation of Worcester zone B in the geographic hierarchy. The locations of the numbered Areas of Search are set out in Annex A.</p> <p>[Remove figures 7.1a-7.1e and replace with Figure 2.5 from "Worcestershire County Council HRA Addendum", September 2011 (ERM) – see Attachment 3]</p> <p>NEW FOOTNOTE: "Worcestershire County Council HRA Addendum", September 2011 (ERM)</p>	<p>"Worcestershire Waste Core Strategy Habitats Regulations Assessment Addendum September 2011".</p> <p>It identified additional areas around Bredon Hill SAC and Dixon Woods SAC where it could not be concluded that waste management development would have no Likely Significant Effects on the designated sites. It also re-defined the area around Lyppard Grange Ponds SAC.</p> <p>The changes update Appendix 3 to reflect the findings of the HRA.</p>
A 16.	<p>Change to Annex A</p> <p>Remove the division between Worcester a and Worcester b in Figure 19 in Annex A. See Attachment 4.</p>	<p>The change provides clarity and avoids confusion (see response to representation 667/14).</p>

Section B: Focused changes - Capacity gap and objective WO3

Change reference number	Change	Reason				
2. Spatial Portrait						
B 1.	<p>Change to Table 2 (page 20):</p> <p>"Table 2: Minimum Capacity gap 2010/11 (all waste streams)</p> <table><tr><th>Management type (all waste streams)</th><th>Current capacity gap 2010/11</th></tr><tr><td>Re-use and recycling</td><td>411,500 391,000 tpa</td></tr></table>	Management type (all waste streams)	Current capacity gap 2010/11	Re-use and recycling	411,500 391,000 tpa	<p>Change made in response to representation 1679/49a (Axis on behalf of Mercia Waste Management).</p> <p>To correct an error made in calculating</p>
Management type (all waste streams)	Current capacity gap 2010/11					
Re-use and recycling	411,500 391,000 tpa					

Change reference number	Change		Reason																		
	<table><tr><td>'Other recovery'</td><td>240,500 tpa</td></tr><tr><td>Sorting and transfer</td><td>0 tpa</td></tr><tr><td>Disposal and landfill</td><td>0 tpa</td></tr></table> <p>Note: calculations based on the targets set out in Objective WO3 (except for C&D waste which is calculated at 25% for static facilities) , and assuming a maximum landfill or disposal level of 25% for C&I, C&D and Hazardous waste and 22% for MSW. A more detailed breakdown of this information is available in <i>Appendix 4</i>."</p>	'Other recovery'	240,500 tpa	Sorting and transfer	0 tpa	Disposal and landfill	0 tpa		<p>MSW re-use and recycling and recovery targets, which mistakenly used a re-use and recycling target of 55% for MSW rather than the 50% in Objective WO3. See also the changes to clarify objective WO3 and Appendix 4.</p> <p>The evidence base for this change is set out in the "<i>Addendum to the Waste Core Strategy Background Document Arisings and capacity</i>" (28th July 2011) and constitutes a recalculation of the capacity gap for re-use and recycling MSW at 50% rather than 55% re-use and recycling, in line with Objective WO3.</p> <p>The change to correct this error is consistent with the approach taken in the rest of the strategy and results in less than a 3% change to the overall capacity gap (2025/26) and only 1 hectare difference in land requirements.</p>												
'Other recovery'	240,500 tpa																				
Sorting and transfer	0 tpa																				
Disposal and landfill	0 tpa																				
B 2.	<p>Change to Figure 8 (page 20):</p>  <table><caption>Estimated data for Figure 8</caption><tr><th>Financial Year</th><th>Re-use and recycling capacity gap (tonnes per annum)</th><th>'Other recovery' capacity gap (tonnes per annum)</th></tr><tr><td>2019/21</td><td>400,000</td><td>150,000</td></tr><tr><td>2020/22</td><td>420,000</td><td>160,000</td></tr><tr><td>2025/26</td><td>500,000</td><td>180,000</td></tr><tr><td>2030/31</td><td>550,000</td><td>190,000</td></tr><tr><td>2035/36</td><td>600,000</td><td>200,000</td></tr></table>		Financial Year	Re-use and recycling capacity gap (tonnes per annum)	'Other recovery' capacity gap (tonnes per annum)	2019/21	400,000	150,000	2020/22	420,000	160,000	2025/26	500,000	180,000	2030/31	550,000	190,000	2035/36	600,000	200,000	<p>Change to Figure 8 to amend the re-use and recycling capacity gap line.</p> <p>This is to reflect the changes to the calculations which inform Appendix 4 (see below) and Table 2 (see above).</p>
Financial Year	Re-use and recycling capacity gap (tonnes per annum)	'Other recovery' capacity gap (tonnes per annum)																			
2019/21	400,000	150,000																			
2020/22	420,000	160,000																			
2025/26	500,000	180,000																			
2030/31	550,000	190,000																			
2035/36	600,000	200,000																			

Change reference number	Change	Reason																														
	<div></div>																															
B 3.	<p>Change to Paragraph 2.63 (page 32) and Footnote 45:</p> <p>"Table 3 shows the minimum capacity gap and approximate land requirements ⁴⁵"</p> <p>FOOTNOTE 45: "The capacity gap is based on the assumption of:</p> <ul style="list-style-type: none">• Minimum recycling of 50% for MSW, and 55% for C&I and Hazardous waste, and 25% of C&D waste at static facilities; and• Maximum landfill 25% C&I, C&D and Hazardous waste, 22% MSW;• a working assumption for 'other recovery' 25% C&I and Hazardous waste, 28% for MSW. <p>Land requirements are This is based on average throughputs per hectare for facilities in Worcestershire: Re-use and recycling 23,500tpa, Recovery 32,000tpa. Further details are set out in the Waste Core Strategy Background document "Arisings and capacity". "</p>	<p>The change explains the assumptions behind the capacity gap and land requirements more clearly. This information was previously provided in the Waste Core Strategy Background Document "<i>Arisings and capacity</i>".</p>																														
B 4.	<p>Changes to Table 3 (page 32):</p> <p>"Table 3: Capacity gap and land requirements (all waste streams)</p> <table><tr><th></th><th>2010/11</th><th>2015/16</th><th>2020/21</th><th>2025/26</th></tr><tr><td>Capacity gap (total)</td><td>652,000</td><td>675,000</td><td>750,000</td><td>805,000</td></tr><tr><td>Capacity gap (total)</td><td>631,500</td><td>654,000</td><td>728,000</td><td>782,000</td></tr><tr><td>Re-use and recycling</td><td>411,500</td><td>421,500</td><td>482,000</td><td>521,500</td></tr><tr><td>Re-use and recycling</td><td>391,000</td><td>400,500</td><td>460,000</td><td>498,500</td></tr><tr><td>'Other recovery'</td><td>240,500</td><td>253,500</td><td>268,000</td><td>283,500</td></tr></table>		2010/11	2015/16	2020/21	2025/26	Capacity gap (total)	652,000	675,000	750,000	805,000	Capacity gap (total)	631,500	654,000	728,000	782,000	Re-use and recycling	411,500	421,500	482,000	521,500	Re-use and recycling	391,000	400,500	460,000	498,500	'Other recovery'	240,500	253,500	268,000	283,500	<p>Change made in response to representation 1679/49a (Axis on behalf of Mercia Waste Management).</p> <p>See reason in reference B 1.</p> <p>Axis supports this change.</p>
	2010/11	2015/16	2020/21	2025/26																												
Capacity gap (total)	652,000	675,000	750,000	805,000																												
Capacity gap (total)	631,500	654,000	728,000	782,000																												
Re-use and recycling	411,500	421,500	482,000	521,500																												
Re-use and recycling	391,000	400,500	460,000	498,500																												
'Other recovery'	240,500	253,500	268,000	283,500																												

Change reference number	Change					Reason
	Sorting and transfer	0	0	0	0	
	Landfill and disposal	0	0	0	0	
	Land requirements (total)	25.5 ha	26 ha	29 ha	31 ha	
	Land requirements (total)	25 ha	25 ha	29 ha	30 ha	
	Re-use and recycling	18 ha	18 ha	20 ha	22 ha	
	Re-use and recycling	17 ha	17 ha	20 ha	21 ha	
	'Other recovery'	8 ha	8 ha	9 ha	9 ha	
	Sorting and transfer	0	0	0	0	
	Landfill and disposal	0	0	0	0	
	Note: Further details and projections beyond the life of the strategy are given in Appendix 4. "					
B 5.	<p>Change to Objective WO3 (page 32):</p> <p>"WO3 To make driving waste up the waste hierarchy the basis for waste management in Worcestershire.</p> <p>The following minimum targets for recycling, (including composting) and 'other recovery' have been set in relation to this objective⁴⁷:</p> <p>C&I incl Hazardous and Agricultural waste—75%</p> <p>C&D—75%</p> <p>MSW—78%, with a target of 50% recycling and composting by 2020, a maximum of 22% landfill and the remainder as energy recovery.</p> <p>Re-use and recycling, (including composting) and 'other recovery' by 2020 <small>NEW FOOTNOTE 1:</small></p> <ul style="list-style-type: none">• C&I including Agricultural Waste target: Re-use, recycling and 'other recovery' Minimum 75% With re-use and recycling at minimum 55%• C&D target: Re-use and recycling Minimum 75%• MSW target: Re-use, recycling and 'other recovery' Minimum 78% With re-use and recycling at minimum 50%• Hazardous waste target:					<p>Change to targets</p> <p>Change made in response to representation 1679/49 a (Axis on behalf of Mercia Waste Management) and 717/52 c (Natural England) and in response to Sustainability Appraisal table 8.3 'Mitigation recommendations'.</p> <p>The addition of a long-term aim for 'zero-waste' to landfill</p> <p>Change made in response to Government Review of Waste Policy in England 2011.</p> <p>This concept was influential in the development of the Waste Core Strategy and formed part of the guiding philosophy in the First Draft Submission</p>

Change reference number	Change	Reason								
	<div>Re-use, recycling and 'other recovery' Minimum 75% With re-use and recycling at minimum 55%</div> <div>The long-term aim is for all waste to be treated as a resource and for 'zero-waste' to landfill or disposal^{NEW FOOTNOTE 2}."</div> <div>Footnote 47: Based on JMWMS for MSW and "Waste Scenarios Study" WMRA July 2005 for other waste streams, see background document 'Arisings and capacity'.</div> <div>NEW FOOTNOTE 1: Details of how these targets have been derived are set out in the Waste Core Strategy Background Document "<i>Arisings and Capacity</i>".</div> <div>NEW FOOTNOTE 2: Diverting all waste from landfill will require increased re-use and recycling and 'other recovery' capacity beyond that shown in the capacity gap analysis.</div>	<div>Consultation (paragraph 3.8i). The concept of the West Midlands as a Zero waste region was lead by WMRA. With the abolition of the WMRA and no clear policy guide for the concept in the RSS the term 'zero-waste' was not used in the Publication Document (Regulation 27), although the concept remained.</div> <div>The change has been made to include zero-waste as a long term aim is consistent with the approach taken in the development of the Waste Core Strategy and supports the Vision in the Publication Document which states that: "Waste in Worcestershire will be managed as a resource" (paragraph 2.54b).</div>								
8. Implementation and Monitoring Framework										
B 6.	<div>Change to Paragraph 8.16 (page 68):</div> <div>"The following minimum targets for re-use, recycling (including composting) and 'other recovery' have been set in relation to this objective:</div> <table><tr><td>C&I (including hazardous and agricultural waste)</td><td>75%</td></tr><tr><td>C&D</td><td>75%</td></tr><tr><td>MSW</td><td>78%</td></tr><tr><td>Hazardous waste</td><td>75%</td></tr></table> <div>(with a target of 50% recycling and composting by 2020, a maximum of 22% landfill and the remainder as energy recovery).</div> <div>These targets are purposefully ambitious, so that the approach in the Waste Core Strategy does not inhibit the</div>	C&I (including hazardous and agricultural waste)	75%	C&D	75%	MSW	78%	Hazardous waste	75%	<div>Change made in response to 1679/49 a and b (Axis on behalf of Mercia Waste Management) and 717/52 c (Natural England) and in response to Sustainability Appraisal table 8.3 'Mitigation recommendations' and the 'zero waste' vision in the <i>Government Waste policy Review in England 2011</i>.</div>
C&I (including hazardous and agricultural waste)	75%									
C&D	75%									
MSW	78%									
Hazardous waste	75%									

Change reference number	Change	Reason
	delivery of facilities at the highest appropriate level of the waste hierarchy and contributes towards the long-term aim for all waste to be treated as a resource and for 'zero-waste' to landfill or disposal."	
B 7.	<p>Change insert after Paragraph 8.22 (page 69):</p> <p>"Zero – waste to landfill as a long-term aim</p> <p>8.22a The targets in objective WO3 have formed the basis of the capacity gap shown in Appendix 4 of the Waste Core Strategy and represent a level of re-use, recycling and 'other recovery' which, based on the available evidence, is considered to be ambitious yet achievable. However, the <i>Government Review of Waste Policy in England 2011</i>, and its emphasis on moving towards a zero waste economy ^{NEW FOOTNOTE 1}, requires some consideration of how all waste could be diverted from landfill in the long-term. To enable this to happen, waste arisings will need to be minimised and increased capacity for recycling or 'other recovery' will be required.</p> <p>8.22 b The potential capacity gap and land requirements to enable zero-waste to landfill have been considered in "<i>Annex A to Waste Core Strategy Background Document Arisings and Capacity: September 2011</i>" ^{NEW FOOTNOTE 2} which demonstrates that the capacity gap in a zero-waste scenario would be greater than that indicated in Appendix 4. These calculations provide an indication of likely need but take no account of the mix of technologies which may be feasible or waste minimisation measures and any reduction in arisings.</p> <p>8.22c Further issues relating to the deliverability of this long-term aim are considered in Paragraph 8.36a alongside deliverability of Objective WO5, as many of the considerations overlap."</p> <p>NEW FOOTNOTE 1: Paragraph 28 of the <i>Government Review of Waste Policy in England 2011</i> (Defra, 2011) states: "We need to move beyond our current throwaway society to a "zero waste economy" in which material resources are re-used, recycled or recovered wherever possible, and only disposed of as the option of very last resort."</p> <p>NEW FOOTNOTE 2: Available at www.worcestershire.gov.uk/wcs</p>	Change made in response to the 'zero waste' vision in the <i>Government Waste policy Review in England 2011</i> , see above.
B 8.	<p>Change to Paragraph 8.27 (page 70):</p> <p>"The capacity gap and therefore the land requirements identified in Table 3 and Appendix 4 are based on the following assumptions:</p> <ul style="list-style-type: none"> Estimates of projections based on the assumptions in Table 9. 	Change made to improve clarity and update context.

Change reference number	Change	Reason															
	<p>In practice however these projections are likely to be above actual levels of waste arisings. They are already higher than the figures for actual waste arisings for comparable years as set out in the Waste Data Interrogator (WDI). The WDI shows a 28% decrease in the amount of HCI waste managed in Worcestershire between 2007-2009 and a 21% decrease in waste managed in England over the same period. The recent Waste Data Overview ^{NEW FOOTNOTE} also showed a decrease in waste arisings across all waste streams nationally of 11.3% between 2004-2008.</p> <p>The projections make no allowance for the possibility that fiscal and regulatory policies and national and local initiatives will themselves foster more efficient industrial practices and further reductions in waste production. In the short term at least, the current economic downturn has already led to reduced output and it is possible that both waste arisings will remain lower for some years to come.</p> <p>The projections of MSW, clinical waste and C&D waste arisings in the strategy are based on household growth targets set out in the proposed RSS Phase Two Revision. However the proposed revision has not been adopted and the Secretary of State has expressed his intention to revoke the existing RSS. At the time of publication the only planning authority in Worcestershire with an adopted Core Strategy is Wyre Forest District Council and several local planning authorities across Worcestershire have yet to locally determine future housing and employment provision. This will need to be monitored and any impacts on the projections and the deliverability of the Waste Core Strategy will be considered in the Annual Monitoring Report.</p> <ul style="list-style-type: none">All existing facilities will continue to operate at their current capacity⁹⁸ and increased capacity will be realised through new facilities: This is important as it allows for adequate capacity to be planned for, however in practice it is very possible that some additional capacity will be provided through the intensification of existing sites. This will be monitored through the AMR. ..." <p>NEW FOOTNOTE: Defra (June 2011)</p>																
B 9.	<p>Change to Table 10 (page 72):</p> <table><tr><th></th><th>2010/11</th><th>2015/16</th><th>2020/21</th><th>2025/26</th></tr><tr><td>Capacity gap (total) tpa</td><td>652,000</td><td>675,000</td><td>750,000</td><td>805,000</td></tr><tr><td>Capacity gap</td><td>631,500</td><td>654,000</td><td>728,000</td><td>782,000</td></tr></table>		2010/11	2015/16	2020/21	2025/26	Capacity gap (total) tpa	652,000	675,000	750,000	805,000	Capacity gap	631,500	654,000	728,000	782,000	<p>Change made in response to representation 1679/49a (Axis on behalf of Mercia Waste</p>
	2010/11	2015/16	2020/21	2025/26													
Capacity gap (total) tpa	652,000	675,000	750,000	805,000													
Capacity gap	631,500	654,000	728,000	782,000													

Change reference number	Change					Reason
	(total) tpa					Management). See <i>reason</i> in reference B 1.
	Re-use and recycling	411,500	421,500	482,000	521,500	
	Re-use and recycling	391,000	400,500	460,000	498,500	
	'Other recovery'	240,500	253,500	268,000	283,500	
	Sorting and transfer	0	0	0	0	
	Landfill and disposal	0	0	0	0	
	a) Land requirements (total)	25.5 ha	26 ha	29 ha	31 ha	
	a) Land requirements (total)	25 ha	25 ha	29 ha	30 ha	
	Re-use and recycling	18 ha	18 ha	20 ha	22 ha	
	Re-use and recycling	17 ha	17 ha	20 ha	21 ha	
	'Other recovery'	8 ha	8 ha	9 ha	9 ha	
	Sorting and transfer	0	0	0	0	
	b) number of facilities (total)	23-31	24-32	27-37	29-39	
	b) number of facilities (total)	23-30	23-31	26-35	28-38	
	Re-use and recycling	21-29	22-30	25-35	27-37	
	Re-use and recycling	21-28	21-29	24-33	26-36	
	'Other recovery'	2	2	2	2	
	Sorting and transfer	0	0	0	0	
	Landfill and disposal	0	0	0	0	
B 10.	Change to Paragraph 8.32 (page 73): "Existing landfill capacity in Worcestershire is sufficient to meet need during the lifetime of the strategy ¹⁰¹ and no disposal requirement has been identified . Therefore, landfill and disposal have has not been considered in assessing the areas of search."					Change made for improved clarity.
B 11.	Change, insert after Paragraph 8.36 (page 74):					Change made to give consideration to the

Change reference number	Change	Reason
	<p><i>"Realising zero-waste to landfill in the long term</i></p> <p>8.36 a The <i>"Annex A to Waste Core Strategy Background Document Arisings and Capacity: September 2011"</i> ^{NEW FOOTNOTE 1} indicates that in order to meet the capacity gap to achieve zero-waste to landfill <u>by the end of the strategy</u>, approximately 40 - 44 hectares of land would be required ^{NEW FOOTNOTE 2}. This is over and above the 34 hectares of suitable land that is currently available. However zero-waste is a long-term aim. The targets set in WO3 are milestones towards this zero-waste aim and there is adequate land available to deliver the capacity gap to meet these targets. District Council plans will enable the rolling 5 year provision to be implemented and ensure that sufficient land is available. It is therefore not felt that land availability at the present time would undermine the Strategy."</p> <p>NEW FOOTNOTE 1: Available at www.worcestershire.gov.uk/wcs</p> <p>NEW FOOTNOTE 2: These calculations only provide an indication of likely need as they take no account of the mix of technologies which may be feasible or waste minimisation measures and a reduction in arisings.</p>	deliverability of zero-waste in the long term, in accordance with changes to Objective WO3 (see B 5).
B 12.	<p>Change to Appendix 4 (page 115):</p> <p>See Attachment 1 to this document.</p>	To correct an error in calculation, as set out in <i>Addendum to Arisings and Capacity document - 28th July 2011</i> (also see reference B 1).

Section C: Changes for clarity or to correcting errors and omissions - Land availability

Change reference number	Change	Reason
8. Implementation and monitoring framework		
C 1.	<p>Change to Paragraph 8.33 (page 73):</p> <p>"In December 2010/January 2011 the availability of units on the identified areas of search was assessed. This is only a snap-shot but is useful in indicating likely land availability. The Council's database held details of a total of over 270 units available for</p>	The Publication Document gave two different figures for hectares currently available. 34 hectares

Change reference number	Change	Reason
	rent/sale ¹⁰² totalling 42 34 hectares of suitable land (see Table 11 [change to bold])."	is correct and changes are made to amend the error.
C 2.	<p>Change to Paragraph 8.35 (page 74):</p> <p>"8.35 The 42 34 hectares currently available is little above the 31 hectares required by the end of the strategy to deliver the capacity gap (see Table 10), however as discussed above, the capacity gap and land requirement figures are likely to be a worst-case scenario. In addition the assessment of land available only considers derelict or industrial land and does not include new industrial estates currently being developed or new industrial land that will be brought forward through the City, District and Borough Development Frameworks. The County Council will engage with City, Borough and District councils to ensure that waste management is considered when allocating future employment land.</p> <p>8.35a The proposed Phase Two Revision of the WMRSS included proposals for the Employment Land Provision needed to achieve a 5 year reservoir of "readily available employment land" outside of town centres, regional employment sites, regional and major investment sites. The reservoir includes "land suitable for development within use classes B1 (except offices located in town centres), B2 and B8 uses and also some sui generis uses such as waste management facilities which have characteristics and require land and property requirements that would normally only be found in employment areas" ^{NEW FOOTNOTE 1}</p> <p>8.35b The rolling 5 year provision of employment land for Worcestershire would be 96 hectares. On average therefore new waste management capacity will require approximately 2% of this provision over the life of the strategy ^{NEW FOOTNOTE 2}. The Panel report into the Examination accepted the thoroughness of the evidence base on which the assessments were made and endorsed the principles adopted, the scale of the provision and the use of this land for waste management purposes. At present this evidence is the best available assessment of industrial land needs.</p> <p>8.35c The County Council will engage with City, Borough and District Councils to ensure that waste management is considered when allocating future employment land. "</p> <p>NEW FOOTNOTE 1: WMRSS Phase 2 Revision p 96 footnotes 1 and 2</p> <p>NEW FOOTNOTE 2: Based on the assumption that 31 hectares is required between 2010/11 and 2025/6</p>	<p>Correction to hectares currently available</p> <p>The Publication Document gave two different figures for hectares currently available. 34 hectares is correct and changes are made to amend the error.</p> <p>Other changes to paragraph 8.35 are made to improve clarity.</p> <p>Insertion of paragraphs 8.35a-c</p> <p>Changes are made to add additional detail relating to employment land provision. These reintroduce reference to the RSS which did not appear in the Publication Document because of the status of the RSS at the time.</p>

Change reference number	Change	Reason																		
	averaging 2 hectares per annum. This equates to an average of approximately 2% of the 96 hectare land provision per year.																			
C 3.	<p>Change to Paragraph 8.39 (page 75):</p> <p>"In Worcestershire many existing waste management operations currently take place on industrial estates. This trend and the findings of the Industrial Estates Study indicate that this element of the Waste Core Strategy will be deliverable. However at the time of publication local planning authorities across Worcestershire, with the exception of Wyre Forest, have yet to locally determine future provision of employment provision. Development plan documents will need to be monitored as they emerge, to ensure that the Waste Core Strategy remains deliverable in the medium to long-term."</p>	<p>Change made in response to representation 681/48 c (Malvern Hills District Council).</p> <p>Malvern Hills District Council have been contacted and are in agreement with the change.</p>																		
C 4.	<p>Change to Table 11 (page 77):</p> <table border="1"> <thead> <tr> <th>Level</th><th>Available land</th><th>Available units</th></tr> </thead> <tbody> <tr> <td>Level 1</td><td>25.72 16.88 ha</td><td>150</td></tr> <tr> <td>Level 2</td><td>9.06 ha</td><td>101</td></tr> <tr> <td>Level 3</td><td>7.74 ha</td><td>21</td></tr> <tr> <td>Level 4</td><td>-0.03 ha</td><td>-1</td></tr> <tr> <td>Level 5</td><td>-</td><td>-</td></tr> </tbody> </table>	Level	Available land	Available units	Level 1	25.72 16.88 ha	150	Level 2	9.06 ha	101	Level 3	7.74 ha	21	Level 4	-0.03 ha	-1	Level 5	-	-	<p>The Publication Document gave two different figures for hectares currently available. Changes are made to amend the error. This table gives a breakdown of readily available employment land in the Identified Areas of Search in Annex 4 of the Waste Core Strategy at each level of the geographic hierarchy.</p>
Level	Available land	Available units																		
Level 1	25.72 16.88 ha	150																		
Level 2	9.06 ha	101																		
Level 3	7.74 ha	21																		
Level 4	-0.03 ha	-1																		
Level 5	-	-																		

Section D: Changes for clarity or to correcting errors and omissions - Design and operation of development

Change reference number	Change	Reason
3. Managing waste as a resource		
D 1.	<p>Change to Policy WCS 3: Landfill and Disposal, part b) ii. (page 38):</p> <p>"a restoration scheme which contributes positively to the</p>	<p>Change made in response to representation 1733/45</p>

Change reference number	Change	Reason
	<p>objectives of the development plan, with details of aftercare for a minimum period of 5 years."</p> <p>Proposed change to Paragraph 3.29 (page 40):</p> <p>"All proposals for new landfill capacity need to consider the whole life of the landfill site, from engineering through to restoration. The restoration of landfill sites can provide opportunities to create new or enhance existing habitats and provide valuable open space for communities or recreational facilities and should maximise the opportunities to do so. The restoration scheme should be developed taking into account the considerations in Policy WCS 7, and the objectives of relevant city, borough, district, parish and neighbourhood plans."</p>	<p>d (Environment Agency).</p> <p>This will ensure that restoration schemes are in accordance with the Waste Core Strategy, City, Borough and District Core Strategies and parish and neighbourhood plans. This would take into account the protection and enhancement of the local environment, but also allow some flexibility for other schemes which have recreation or other benefits.</p> <p>The Environment Agency are in agreement with the change.</p>
4. Location of new waste management development		
D 2.	<p>Change to Paragraph 4.9 (page 44):</p> <p>"All developments must take into account local movement and transportation policies in the adopted Local Transport Plan, Local Plans and Local Development Frameworks. They and should aim to minimise the impact of the development by reducing the need to transport waste and the need for visitors and the workforce to travel by road. These measures can reduce greenhouse gas emissions associated with the waste management facility."</p>	<p>In response to Sustainability Appraisal table 8.3 'Mitigation recommendations' and representation 717/52 c (Natural England).</p> <p>Natural England are in agreement with the change.</p>
5. Ensuring sustainable waste management development		
D 3.	<p>Change to Policy WCS 9 part d (page 51):</p> <p>"all new built development or significant alterations to buildings which create a gross building footprint of 1000 square metres or more gaining at least 10%⁷⁸ of energy supply annually from on-site renewable or low carbon sources. Where it is demonstrated that this is not practicable, this should be achieved through off-site solutions; and"</p>	<p>In response to representation 1679/49 f (Axis on behalf of Mercia Waste Management).</p> <p>This is a key requirement of national and regional policy. The change will give greater flexibility to how proposed development could achieve the policy requirement in part d.</p>

Change reference number	Change	Reason
D 4.	<p>Change to Paragraph 5.27 (page 51):</p> <p>"Design and construction of new buildings where the re-use of existing buildings is not appropriate and any alterations to existing buildings should consider resource efficiency. Minimising the use of virgin materials could be done in part by re-using materials or using recycled materials where appropriate. On-site recycling of construction and demolition waste can enable management of waste at source, reducing waste miles."</p>	<p>In response to Sustainability Appraisal table 8.3 'Mitigation recommendations' and representation 717/52 c (Natural England).</p> <p>Natural England are in agreement with the change.</p>
D 5.	<p>Change to insert paragraph before Paragraph 5.30 and change to Paragraph 5.30 (page 52):</p> <p>"5.29a Energy demand in the wider economy can be reduced by some waste management facilities that form part of an integrated process enabling recycling or recovery. In most cases the recycling of materials has lower energy demands than the processing of virgin materials. Facilities which prepare materials for re-use, or which sort or process waste as part of a recycling or recovery chain can form part of this integrated process and can contribute towards these reductions.</p> <p>5.30 However, even where there are wider benefits, energy efficiency in the design and operation of waste management facilities must still be considered. This A reduction in energy demand can be achieved through the use of materials, design features, site layout and building orientation which enable the use of natural heating, cooling, lighting and ventilation. Climate sensitive design, layout and building orientation will need to be holistic in its approach and should be guided by principles of national and local policies and guidance⁸⁰. 5.31 — Energy efficiency can also be achieved through operations which make more efficient use of equipment, machinery or other processes."</p>	<p>Representation 1679/49 f (Axis on behalf of Mercia Waste Management) raised concerns that policy WCS 9 did not acknowledge the benefits of waste management facilities on wider energy demands. The changes address this point, however they also maintain the stance that all proposals should also consider energy efficiency in individual facilities.</p> <p>See changes in reference D 3.</p>
D 6.	<p>Change to Paragraph 5.33 (page 52):</p> <p>"The suitability and viability of particular methods will depend on the type of development and the proposed location. The design and operation of proposals for renewable energy provision should address potential amenity and environmental effects in line with the requirements of the Development Plan."</p>	<p>Change made In response to representation 1679/49 f (Axis on behalf of Mercia Waste Management) (see <i>reason</i> to reference D 5).</p>
D 7.	<p>Change to Policy WCS11 (page 58):</p> <p>"POLICY WCS 11: Amenity</p> <p>Waste management facilities will be permitted where it is demonstrated that the operation of the facility and any associated transport will not have unacceptable adverse impacts on local amenity. This must consider impacts on or of:</p> <ul style="list-style-type: none"> i. air quality, including any fumes, dust, odours or bioaerosols. Where relevant, the issues identified in the 	<p>Changes to i-vi</p> <p>Change made to meet the requirements of <i>The Waste (England and Wales) Regulations 2011</i>, in particular Part 6 20(1).</p> <p>Change to Caveat</p>

Change reference number	Change	Reason
	<p>Herefordshire and Worcestershire Air Quality Management Plan, and those of adjoining authorities, must be taken into account; and</p> <p>[new point] planned or unplanned fires; and</p> <ul style="list-style-type: none"> ii. noise and vibrations; and iii. flies insects, vermin and birds; and iv. litter and wind-blown materials; and v. visual intrusion and light pollution; and vi. health <p>Cumulative effects must be considered. Details of any mitigation or compensation proposals must be included; this may be through enclosing operations or through other appropriate measures.</p> <p>Where these are not demonstrated, exceptional circumstances must be clearly justified by the applicant.</p> <p>Where there will be unacceptable adverse impacts on amenity, proposals will only be permitted where it is demonstrated that the benefits of the development at the proposed site clearly outweigh any unacceptable adverse impacts. "</p>	<p>Change made in response to representation 1679/49 i (Axis on behalf of Mercia Waste Management).</p> <p>'Exceptional circumstances' sets too high a test in this case. The change to policy wording has been amended to set out the considerations which should be made in relation to these issues.</p>
D 8.	<p>Change to Paragraph 5.46 (page 58):</p> <p>"Relevant assessments should be undertaken to demonstrate that the proposals will not have unacceptable adverse impacts on amenity or health⁸⁶. This should include considerations of any impacts from transport. The issues to be considered will depend on the nature, scale and location of the proposed development.</p> <p>Distances from residential and recreation areas, waterways, water bodies and other agricultural or urban sites should also be considered where appropriate and should always be taken into account where the proposal relates to landfill ^{NEW}</p> <p>FOOTNOTE "</p> <p>NEW FOOTNOTE: In accordance with <i>The Waste (England and Wales) Regulations 2011</i></p>	<p>Change to meet the requirements of <i>The Waste (England and Wales) Regulations 2011</i>, in particular Part 6 20(1), which requires planning authorities to take the issues listed in <i>Paragraph 1.1 of Annex I to the Council Directive 1999/31/EC</i> into consideration.</p> <p>The change is intended to address point (a) of the Annex. The other points are already considered through policies in the WCS.</p>

Section E: Changes for clarity or to correcting errors and omissions - Local characteristics and Greenbelt

Change reference number	Change	Reason
3. Managing waste as a resource		
E 1.	Change to Paragraph 5.2 (page 45): "... the protection and enhancement of local characteristics is addressed in Policy WCS 10 and Policy WCS 10(z) ."	Change made to reflect the splitting of Policy WCS 10 (see below).
E 2.	<p>Change to Policy WCS10 (page 53): "POLICY WCS10: Local characteristics</p> <p>Waste management facilities will be permitted where it is demonstrated that the design of buildings, layout, landscaping and operation of the facility, and any restoration proposals:</p> <p>a) take account of protect and enhance local characteristics, through consideration of:</p> <ul style="list-style-type: none"> i. the character of the built environment, including appropriate use of form, mass, scale, detailing, materials and green spaces; and ii. the local landscape character as identified in the <i>Worcestershire Landscape Character Assessment</i> and the <i>Worcestershire Historic Landscape Characterisation</i>; and iii. other features identified in Local Development Frameworks, Parish or other Neighbourhood Plans, or other Local Authority strategies, and <p>b) within or impacting upon the Malvern Hills and/or Cotswolds Areas of Outstanding Natural Beauty (AONB), conserve, enhance or restore the natural beauty of the landscape and have no unacceptable adverse impact on the special qualities of the AONB as defined by the relevant AONB mManagement Plan. , and</p> <p>Where there will be unacceptable adverse impacts on local characteristics or an AONB, proposals will only be permitted where it is demonstrated that the benefits of the development at the proposed site clearly outweigh any unacceptable adverse impacts.</p> <p><BREAK POLICY AND RENUMBER SEQUENTIALLY></p> <p>Policy WCS 10(z): Green Belt</p> <p>e) Waste management facilities will be permitted where it is demonstrated that the design of buildings, layout, landscaping and operation of the facility, and any restoration proposals do not constitute inappropriate development in areas designated as Green Belt ⁸³ or where very special circumstances are demonstrated which justify such inappropriate development."</p>	<p>Part a</p> <p>Change made to part a in response to Sustainability Appraisal table 8.3 'Mitigation recommendations' and representation 717/52 c (Natural England).</p> <p>Natural England are in agreement with the change.</p> <p>Caveat to a and b</p> <p>Change made to introduce caveat for consistency with change to WCS 11 in response to representation 1679/49 i (see reference D 7).</p> <p>Break in policy</p> <p>The caveat does not apply to Green Belt. The break in this policy is made to avoid confusion.</p> <p>Green Belt</p> <p>Change made to Green Belt policy in order for the WCS to be in accordance with national policy and in response to representations:</p> <p>1730/23 (Mr Townley), 1727/31 (Mr S Field), 1728/32 (Mr N Blundell), 1729/33 (Mrs S Blundell), 1679/49 g and h (Axis on behalf of Mercia</p>

Change reference number	Change	Reason
		Waste Management), 1644/51 (Mr M Hemmings), 1761/55 (OM & PR Howe), 1760/56 (Mr & Mrs P Morris), 1759/57 (Mr ND Jukes), 1758/58 (M Tranter), 1757/59 (R Tranter), 1756/60 (Mrs T Walkden), 1754/62 (S Derricut), 1753/63 (Mr & Mrs GR Knowles), 1752/64 (Mr & Mrs Bayliss), 1751/65 (G Phillips), 1750/66 (L Lawman), 1749/67 (C Harris), 1748/68 (WD Harris), 1747/69 (Mr R Ward), 1740/70 (Mr Tom Brookes), 1746/71 (T Culloty), 1745/72 (N Culloty), 1744/73 (Ms R Krivosic), 1743/74b (Mr M Krivosic), 1742/75 (T Sealey), 1741/76 (SM Sealey), 1739/77 (Ms S Brookes), 1738/78 (A Brookes), 1737/79 (R Wrench), 1650/88 (S Tranter), 1644/89 (Mrs J Hemmings).

Section F: Changes for clarity or to correcting errors and omissions - Flood risk and water quality

Change reference number	Change	Reason
5. Ensuring sustainable waste management development		
F 1.	<p>Change to Paragraph 5.13 – 5.14 (page49):</p> <p>"5.13 In accordance with national policy⁷⁴, flooding issues must be considered for all development. The requirements are summarised in Annex B of this document. Annex B sets out the how the sequential and exceptions tests should be applied to guide the location of waste management development in Worcestershire in relation to flood risk. The consideration of these issues These and other relevant considerations should be set out in a flood risk assessment (FRA) accompanying the planning application.</p> <p>5.13a In order to remain safe and operational during flood events, waste management facilities should be designed to ensure that materials are stored in a way that would not result in pollution on-site during flooding, and would not allow materials to be washed away and result in pollution problems elsewhere. Safe access for vehicles and pedestrians to the development in the event of flooding should also be considered.</p> <p>5.14 New development can avoid increasing flood risk on the site and elsewhere by incorporating sustainable drainage systems (SuDS)⁷⁵, such as green roofs and permeable car parks, that can cope with high levels of rainfall and improve attenuation of run-off and do not result in either deterioration in water quality or pollution being discharged into local watercourses. There should be no net reduction in flood storage areas and development should not impede flood flow routes."</p> <p>Footnote 74: Currently Planning Policy Statement 25: Development and Flood Risk</p>	<p>Change made in response to representation 1733/45 c (Environment Agency).</p> <p>Change also made to improve clarity and change the way in which national policy is relied upon following the publication of the draft National Planning Policy Framework.</p> <p>The Environment Agency are in agreement with the changes.</p>
F 2.	<p>Change to Appendix 1 (page 98):</p> <p>"... Flood zones - These are areas which [] could be affected in the event of flooding from rivers.</p> <ul style="list-style-type: none"> • Flood zone 3 indicates the extent of a flood with a 1 per cent (1 in 100) chance of happening in any year. • Flood zone 2 indicates the extent of an extreme flood with a 0.1 per cent (1 in 1000) chance of happening in any year. • Flood zone 1 is land assessed as having a less than 1 in 1000 probability of river or sea flooding in any year. <p>Flood zones are defined in planning policy for England (currently</p>	<p>Change made due to uncertainty following the publication of the draft National Planning Policy Framework which does not contain definitions of flood zones.</p>

Change reference number	Change	Reason
	defined in PPS 25 Development and Flood Risk) and are produced ignoring the presence of existing flood defences, since defences can be 'overtopped' if a flood occurs which is higher than the defences are designed to withstand. Defences can even fail in extreme events..."	

Section G: Changes for clarity or to correcting errors and omissions – other issues

Unsorted

Change reference number	Change	Reason
1. Introduction		
G 1.	Change to Paragraph 1.9 (page 2): "... All policies will apply equally to all of these waste streams. It The Waste Core Strategy does not address non-Directive Agricultural Waste, such as crop residues and animal dung where they are managed on the farm holding where they originated , or mineral waste where this is dealt with within the quarry or gravel pit where it is produced."	For clarity.
G 2.	Change to note on Figure 1 (page 5): "Note: Lorry Routes – This information was taked taken from Worcestershire Advisory Lorry Route Map dated 2006" Motorways [change symbol from blue to red] Motorway junction [change symbol from blue to red]	For clarity. Motorways changed to the same colour as principal roads to avoid confusion with waterways.
2. Spatial Portrait		
G 3.	Change to Paragraph 2.16 (page 9): "...There are however some limitations on vessel size due to the locks on or between the canals. and Though there is little likelihood of increased freight traffic on the county's canals in the foreseeable future-, there is more potential for the use of the River Severn . The Waste Core Strategy encourages the consideration of freight transport by water where possible, but recognises that potential is limited."	Change made in response to representation 1280/22 (British Waterways). British Waterways are in agreement with the change.

Change reference number	Change	Reason														
G 4.	<p>Change to Table 1 (page 14):</p> <table><tr><th></th><th>Capacity 2008/9</th></tr><tr><td>Re-use and recycling capacity</td><td>310,000 tpa</td></tr><tr><td>'Other recovery' capacity</td><td>8,000 tpa</td></tr><tr><td>Sorting and transfer capacity</td><td>859,500 tpa</td></tr><tr><td>Household recycling centres</td><td>97,500 tpa</td></tr><tr><td>Landfill capacity</td><td>9,778,000 m³</td></tr><tr><td>Other disposal capacity</td><td><500 tpa</td></tr></table>		Capacity 2008/9	Re-use and recycling capacity	310,000 tpa	'Other recovery' capacity	8,000 tpa	Sorting and transfer capacity	859,500 tpa	Household recycling centres	97,500 tpa	Landfill capacity	9,778,000 m ³	Other disposal capacity	<500 tpa	For clarity.
	Capacity 2008/9															
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Household recycling centres	97,500 tpa															
Landfill capacity	9,778,000 m ³															
Other disposal capacity	<500 tpa															
G 5.	<p>Change to Paragraph 2.61 (page 31):</p> <p>"The evidence base⁴⁴ demonstrates that there is no need for new landfill or disposal capacity. The strategy will encourage management of waste at higher levels of the waste hierarchy. Therefore landfill and disposal facilities will not be encouraged at any level of the geographic hierarchy."</p>	For clarity.														
3. Managing waste as a resource																
G 6.	<p>Change to Paragraph 3.4 (page 34):</p> <p>"The Waste Core Strategy aims to reduce the amount of waste being disposed of or landfilled and no new landfill or disposal capacity is expected to be required in the life of the strategy. However Policy WCS 3 allows for any proposals for landfill or disposal to be assessed if they are brought forward."</p>	For clarity														
G 7.	<p>Change to Policy WCS1 (page 34):</p> <p>"POLICY WCS 1: Re-use and Recycling</p> <p>In order to achieve equivalent self-sufficiency in waste management and deliver the spatial strategy:</p> <p>a) waste management facilities that enable re-use or recycling⁴⁸ of waste, including treatment, storage, sorting and transfer facilities; i) — will be permitted in level 1a and 1b at all levels of the geographic hierarchy ii) — will be permitted in level 2, 3, 4 and 5 where it is demonstrated that the proposed location is at the highest appropriate level of the geographic hierarchy.</p> <p>b) waste water treatment facilities will be permitted at all levels of the geographic hierarchy. "</p>	<p>Changes made to improve clarity; there was no real distinction between parts i and ii.</p> <p>Changes also remove the distinction between level 1a and 1b, in line with the approach outlined in reference B 7.</p>														
G 8.	<p>Change to Paragraph 3.6 (page 35):</p> <p>"Level 1 is the highest level of the geographic hierarchy. If the proposed site is not in level 1 of the geographic hierarchy, applicants should demonstrate that proposals are located at the highest appropriate level..."</p>	Change made to improve clarity.														
G 9.	<p>Change to Paragraph 3.24 (page 39):</p>	For clarity, change made in response to														

Change reference number	Change	Reason
	<p>"... These can be used for landscaping, levelling of sites, the construction of bunds, embankments or features for noise attenuation, or other purposes. Proposals for this type of development will be considered against this policy Policy WCS3: Landfill and disposal."</p>	<p>representations:</p> <p>1730/23 (Mr Townley),</p> <p>1727/31 (Mr S Field),</p> <p>1728/32 (Mr N Blundell),</p> <p>1729/33 (Mrs S Blundell),</p> <p>1644/51 (Mr M Hemmings),</p> <p>1761/55 (OM & PR Howe),</p> <p>1760/56 (Mr & Mrs P Morris),</p> <p>1759/57 (Mr ND Jukes),</p> <p>1758/58 (M Tranter),</p> <p>1757/59 (R Tranter),</p> <p>1756/60 (Mrs T Walkden),</p> <p>1754/62 (S Derricut),</p> <p>1753/63 (Mr & Mrs GR Knowles),</p> <p>1752/64 (Mr & Mrs Bayliss),</p> <p>1751/65 (G Phillips),</p> <p>1750/66 (L Lawman),</p> <p>1749/67 (C Harris),</p> <p>1748/68 (WD Harris),</p> <p>1747/69 (Mr R Ward),</p> <p>1740/70 (Mr Tom Brookes),</p> <p>1746/71 (T Culloty),</p> <p>1745/72 (N Culloty),</p> <p>1744/73 (Ms R Krivosic),</p> <p>1743/74b (Mr M Krivosic),</p> <p>1742/75 (T Sealey),</p> <p>1741/76 (SM Sealey),</p> <p>1739/77 (Ms S Brookes),</p> <p>1738/78 (A Brookes),</p>

Change reference number	Change	Reason															
		1737/79 (R Wrench), 1650/88 (S Tranter), 1644/89 (Mrs J Hemmings).															
4. Location of new waste management development																	
G 10.	<p>Change to Paragraph 4.12 (page 44):</p> <p>"The impact of the development and its associated traffic movements on the safety, integrity and amenity of the road transport network must be considered. Where there is likely to be any impact on the safe and efficient functioning of the transport network the appropriate authorities <small>NEW FOOTNOTE</small> county Highways Authority should be involved from the outset to agree the scope and nature of any mitigation that might be necessary..."</p> <p>NEW FOOTNOTE TEXT: This might include any or all of the following: the county Highways Authority; Network Rail; or British Waterways.</p>	For clarity.															
5. Ensuring sustainable waste management development																	
G 11.	<p>Change to Paragraph 5.5 (page 46):</p> <p>"Internationally, Nationally and Locally designated sites, habitats, species and heritage assets are listed in Table 7 <small>NEW FOOTNOTE</small>."</p> <p>NEW FOOTNOTE TEXT: Areas of Outstanding Natural Beauty and Green Belt are considered in policy WCS 10 Local Characteristics.</p>	<p>Change made in response to representation 681/48b. (Malvern Hills District Council)</p> <p>Malvern Hills District Council have been contacted and are in agreement with the change.</p>															
G 12.	<p>Change to Table 7 (page 46):</p> <table><tr><th></th><th>Designated Sites</th><th>Habitats</th><th>Species</th><th>Heritage assets</th></tr><tr><td>International</td><td><ul style="list-style-type: none">RamsarNatura2000 (SAC and SPA)</td><td><ul style="list-style-type: none">Any internationally designated habitats</td><td><ul style="list-style-type: none">Any internationally protected speciesEuropean Protected Species <small>NEW FOOTNOTE</small></td><td><ul style="list-style-type: none">World Heritage SitesAny internationally designated heritage assets</td></tr><tr><td>National</td><td><ul style="list-style-type: none">National Nature ReservesSites of Special Scientific Interest (SSSI) ⁶⁵</td><td><ul style="list-style-type: none">National BAP habitats</td><td><ul style="list-style-type: none">National BAP speciesSection 41 species list ⁶⁶</td><td><ul style="list-style-type: none">Registered BattlefieldsRegistered Historic Parks and GardensScheduled Ancient MonumentsListed Buildings</td></tr></table>		Designated Sites	Habitats	Species	Heritage assets	International	<ul style="list-style-type: none">RamsarNatura2000 (SAC and SPA)	<ul style="list-style-type: none">Any internationally designated habitats	<ul style="list-style-type: none">Any internationally protected speciesEuropean Protected Species <small>NEW FOOTNOTE</small>	<ul style="list-style-type: none">World Heritage SitesAny internationally designated heritage assets	National	<ul style="list-style-type: none">National Nature ReservesSites of Special Scientific Interest (SSSI) ⁶⁵	<ul style="list-style-type: none">National BAP habitats	<ul style="list-style-type: none">National BAP speciesSection 41 species list ⁶⁶	<ul style="list-style-type: none">Registered BattlefieldsRegistered Historic Parks and GardensScheduled Ancient MonumentsListed Buildings	For clarity.
	Designated Sites	Habitats	Species	Heritage assets													
International	<ul style="list-style-type: none">RamsarNatura2000 (SAC and SPA)	<ul style="list-style-type: none">Any internationally designated habitats	<ul style="list-style-type: none">Any internationally protected speciesEuropean Protected Species <small>NEW FOOTNOTE</small>	<ul style="list-style-type: none">World Heritage SitesAny internationally designated heritage assets													
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Change reference number	Change					Reason
	Local	<ul style="list-style-type: none">Local Nature ReservesLocal sites:<ul style="list-style-type: none">Geologic al Sites⁶⁷Special Wildlife Sites⁶⁸	<ul style="list-style-type: none">Local BAP habitats	<ul style="list-style-type: none">Local BAP species	<ul style="list-style-type: none">Conservatio n AreasHistoric environmen t and heritage assets recorded on county historic environmen t record and local lists, including archaeological features, and landscapes and their settingsHistoric farmsteadsVernacular or locally important features	
NEW FOOTNOTE TEXT: European Protected Species receive protection under The Conservation of Habitats and Species Regulations 2010.						
G 13.	<p>Change to Paragraph 5.60 (page 61):</p> <p>"It is expected that developers will consult with local communities and other stakeholders on all proposals for waste management development before planning applications are submitted. This should be demonstrated in a Consultation Statement ^{NEW} ^{FOOTNOTE} [paragraph break].</p> <p>5.60a Public consultation and involvement..."</p> <p>New footnote text: For further information refer to Worcestershire's Revised Draft Validation Document.</p>					For consistency of terminology with indicator 23 (page 90) and the <i>Revised Draft Validation Document</i> .
8. Implementation and monitoring framework						
G 14.	<p>Change to Paragraph 8.22 (page 69):</p> <p>"The reviewed Joint Municipal Waste Management Strategy (JMWMS) is already committed to achieving this target for MSW household waste and as such the likelihood of delivery is expected to be high. The revised reviewed JMWMS makes waste minimisation its priority ..."</p>					For clarity and consistency with JMWMS.
G 15.	<p>Insert heading after Paragraph 8.36 (page 74):</p> <p>"Deliverability of development on land identified in Policy WCS 4"</p>					For clarity.
G 16.	<p>Change to the heading preceding Paragraph 8.44 (page 76):</p> <p>"WO6: To encourage communities in Worcestershire take</p>					To correct an error and reflect the objective as

Change reference number	Change	Reason
	responsibility for their own waste and involve all those affected as openly and effectively as possible."	set out in Section 2.
G 17.	Change to Paragraph 8.44 (page 76): "It is expected that all proposals applicants will undertake public consultation prior to submission submitting planning applications . Between 2008 and 2009 the number of applications submitted to the County Council with consultation statements rose from 18% to 22% ¹⁰⁶ ..."	For clarity.
G 18.	Change to Paragraph 8.49 (page 77): "The policies drive waste management development to the highest appropriate level of the spatial geographic hierarchy. The land availability in the areas of search, as discussed above, is also concentrated at the higher levels of the hierarchy (see Table 11). This approach is therefore felt to be deliverable."	For clarity.
G 19.	Change to What Do We Want To Achieve (Page 80): "Objective WO1: To base decisions on the need to reduce greenhouse gas emissions and the need to mitigate and to be resilient to climate change ."	To correct an error and reflect the objective as set out in Section 2.
G 20.	Change to Risk Assessment (Page 80): "... Possible gap in applicant's knowledge relating to delivering energy efficiency or renewable energy hierarchy and design taking into account climate change adaptation and mitigation could result in a time lag in adoption/acceptance of innovative design approaches ..."	To correct an error and reflect the changed policy approach between the First Draft Submission consultation document and the Submission document.
G 21.	Changes to footnotes (Page 81): " ¹⁰⁹ This is less than 100% as it may not be possible for some small applications developments to include provision for this. These will be identified in the AMR." " ¹¹⁰ This is less than 100% as it may not be possible for some small applications developments to include provision for this. These will be identified in the AMR ."	For clarity and consistency.
G 22.	Change to What Do We Want To Achieve (Page 82): "Objective WO2: To base decisions on the principles of sustainable development by protecting and enhancing the C ounty's natural resources, environmental, cultural and economic assets, the character and amenity of the local area and the health and wellbeing of the local people".	To correct an error and reflect the objective as set out in Section 2.
G 23.	Change to Policy Framework (Page 82): "... WCS 10: Local characteristics; WCS 10(z): Green Belt ; WCS 11..."	Change made to reflect the changes to policy WCS 10.
G 24.	Change to Responsible Bodies (Page 82): "• Worcestershire County Council as Waste Planning Authority,	Change made to include Local Planning Authorities who will be

Change reference number	Change	Reason						
	<p>Waste Disposal Authority and landowner.</p> <ul style="list-style-type: none"> • District Councils as Local Planning Authorities addressing implications of general applications for planning permission near to existing waste management facilities. • Environment Agency, Natural England, English Heritage, Worcestershire Wildlife Trust and appropriate health authority for technical advice. • Environment Agency and Defra for data collection." 	responsible for implementing Policy WCS 13.						
G 25.	<p>Change to Other Issues That Will Be Monitored (Page 84):</p> <p>"Facilities permitted on each of the land types identified in policy WCS 3-4."</p>	To amend an error made in the Publication document.						
G 26.	<p>Change to Other Issues That Will Be Monitored (Page 89):</p> <p>"Best available data on waste arisings and capacity will be monitored through the life of the strategy in order to determine changes in the capacity gap. This information will be used to update Appendix 4 [change Appendix 4 to bold] as part of the AMR."</p>	For clarity.						
G 27.	<p>Change to Delivery Mechanism (Page 90):</p> <p>"• Waste Planning Applications (Public and private sector)</p> <ul style="list-style-type: none"> • Other planning applications" 	To correct an omission, reference required to other planning applications in relation to policy WCS13.						
G 28.	<p>Change to What Do We Want To Achieve (Page 92):</p> <p>"WO8: To direct development to the most appropriate locations in accordance with the Spatial Strategy."</p>	To correct an error and reflect the objective as set out in Section 2.						
G 29.	<p>Change to Indicator 25 (Page 92):</p> <table border="1"> <thead> <tr> <th>Indicator</th><th>Target</th><th>Review Trigger</th></tr> </thead> <tbody> <tr> <td>25. Permitted waste management development at each level of the geographic hierarchy.</td><td> <p>100% of new 'Other recovery' capacity at level 1 and 2</p> <p>and</p> <p>Over 50% of other new re-use, recycling, storage, sorting and transfer capacity at levels 1 – and 2</p> </td><td>Less than 100% or 50% respectively over a five year period.</td></tr> </tbody> </table>	Indicator	Target	Review Trigger	25. Permitted waste management development at each level of the geographic hierarchy.	<p>100% of new 'Other recovery' capacity at level 1 and 2</p> <p>and</p> <p>Over 50% of other new re-use, recycling, storage, sorting and transfer capacity at levels 1 – and 2</p>	Less than 100% or 50% respectively over a five year period.	To clarify that the targets apply to new planning permissions, not existing waste management capacity.
Indicator	Target	Review Trigger						
25. Permitted waste management development at each level of the geographic hierarchy.	<p>100% of new 'Other recovery' capacity at level 1 and 2</p> <p>and</p> <p>Over 50% of other new re-use, recycling, storage, sorting and transfer capacity at levels 1 – and 2</p>	Less than 100% or 50% respectively over a five year period.						
Appendices and Annexes								
G 30.	<p>Change to Appendix 1 (page 93):</p> <p>Insert in acronyms and abbreviations "MRS - Metal Recycling</p>	To correct an omission. MRS is used in the						

Change reference number	Change	Reason
	Site"	note to Table 8.
G 31.	<p>Change to Appendix 1 (page 97):</p> <p>"... Constraints – Features or designations which restrict the use of land. Primary constraints are matters of international, and national importance. Secondary constraints are locally important sites that contribute to the distinctive character of Worcestershire..."</p>	'Constraints' was a concept used in the First Draft Submission consultation document but not the Publication Document. The definition is no longer needed.
G 32.	<p>Changes to Appendix 1 (page 100):</p> <p>"... Other recovery - Article 3 (15) of the revised Waste Framework Directive defines recovery as "any operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy". Energy recovery and reprocessing waste into materials that are to be used as fuels."</p> <p>"... Recovery - See Other Recovery Article 3 (15) of the revised Waste Framework Directive defines recovery as "any operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy". For the purpose of the Waste Core Strategy this is split into</p> <ul style="list-style-type: none"> • recycling (see below) and • 'other recovery' (see above)..." 	To clarify the definitions of recovery and 'other recovery' used in the Waste Core Strategy.
G 33.	<p>Change to Appendix 1 (page 100):</p> <p>"... Overview of waste management in Worcestershire Spatial Portrait - The Overview Spatial Portrait paints a picture of Worcestershire as it is at present. It highlights the main aspects of what makes the county distinctive and what waste management in the county is like." [move to between 'Source Protection Zone' and 'Special Areas of Conservation' – page 101 – for correct alphabetical order]</p>	Change made to reflect the approach taken in the Submission document rather than the First Draft Submission consultation document.
G 34.	<p>Change to Annex A (page 116):</p> <p>In order to avoid future confusion, postcode details will be added to all areas of search listed in Figure 19 in Annex A. See Attachment 4.</p>	Change made in order to provide clarity and avoid confusion (see response to representation 667/14).
General changes		
G 35.	Photographs of other waste management facilities in Worcestershire to be included.	In response to representation 1632/83a (Mr M Nattrass, MEP).

Section H: Changes to referencing

2. Spatial Portrait	
H 1.	<p>Change to Paragraph 2.7 (page 7):</p> <p>"Land drainage and flooding issues are important influences on development in Worcestershire. Approximately 10% of the land area of Worcestershire is at risk of flooding ^{NEW FOOTNOTE}"</p> <p>NEW FOOTNOTE: "<i>Planning for Climate Change in Worcestershire Technical Research Paper Draft: May 2008</i>"</p>
H 2.	<p>Change to Paragraph 2.8 (page 7):</p> <p>"71% of the population of Worcestershire live in urban areas, principally Worcester, Redditch and Kidderminster, Stourport on Severn, Bromsgrove, Malvern, Droitwich Spa and Evesham, with over one sixth of the population living in Worcester ^{NEW FOOTNOTE}"</p> <p>NEW FOOTNOTE: "<i>Worcestershire County Economic Assessment 2009-2010</i>"</p>
H 3.	<p>Change to Paragraph 2.17 (page 9):</p> <p>"... Trainloads generally convey around 1000 tonnes payload meaning that even on a weekly train basis a terminal/waste transfer station would need to have throughput of 52,000 tonnes a year ^{NEW FOOTNOTE}"</p> <p>NEW FOOTNOTE: "<i>Information provided by Network Rail in response to the Waste Core Strategy First Draft Submission consultation (reference WR25-4 in the 'Consultation Response Document, December 2010'</i> "</p>
H 4.	<p>Change to footnote 20 attached to Paragraph 2.21 (page 10):</p> <p><i>"Information on Worcestershire's CO₂ emissions from Worcestershire Partnership Climate Change Strategy.</i> These figures exclude emissions from motorways"</p>
H 5.	<p>Change to Paragraph 2.22 (page 10):</p> <p>"... In the UK waste management is estimated to contribute around 2.5% of total greenhouse gas emissions and 41% of all methane emissions ^{NEW FOOTNOTE 1} . Most of these emissions come from the landfill of biodegradable waste ^{NEW FOOTNOTE 2}"</p> <p>NEW FOOTNOTE 1: "<i>Stern Review on the Economics of Climate Change s.l.: HM Treasury, 2006. For further information see Waste Core Strategy background document 'Climate change and waste management in Worcestershire'.</i>"</p> <p>NEW FOOTNOTE 2: "<i>Defra Waste Strategy for England 2007</i>"</p>
H 6.	<p>Change to Paragraph 2.35 (on page 14):</p> <p>"In Worcestershire, most existing facilities are smaller than 0.5 ha in size (65% of facilities), with only 22% of facilities being over 1 ha in size. There are however some larger sites in the county, with the largest being approximately 13 ha ^{NEW FOOTNOTE} ."</p> <p>NEW FOOTNOTE: "<i>See Waste Core Strategy background document 'Waste sites in Worcestershire'.</i>"</p>
H 7.	<p>Change to Footnote 36 (paragraph 2.50, page 26):</p> <p>"See "<i>Waste Core Strategy</i> background paper document "<i>Hazardous Waste</i>" [change document title to italics]"</p>

H 8.	<p>Change to paragraph 2.57 (page 28):</p> <p>"... The Habitats Regulations Assessment ^{NEW FOOTNOTE} and Strategic Flood Risk Assessment have also been taken into account⁴⁰.</p> <p>NEW FOOTNOTE: " <i>Worcestershire Waste Core Strategy Habitats Regulations Assessment Final Report March 2011</i>" and " <i>Worcestershire Waste Core Strategy Habitats Regulations Assessment Addendum September 2011</i>"</p>
H 9.	<p>Footnotes:</p> <p>Update footnote numbers throughout document to incorporate proposed new footnotes.</p>
H 10.	<p>Maps:</p> <p>Update copyright information as required by Ordnance Survey</p> <p>At present this needs to be updated to © Crown copyright and database rights 2011 Ordnance Survey 100024230. However this may change prior to adoption.</p>

Section I: Corrections to spelling, grammar and other typographical errors

Foreword	
I 1.	<p>Change to Paragraph 1.5 (page 1):</p> <p>"The Worcestershire County Council's Waste Core Strategy will guide our approach to planning for our county's waste management facilities until 2027³..."</p>
Introduction	
I 2.	<p>Change to Paragraph 1.13 (page 2):</p> <p>"Interim Sustainability Appraisals (SA) have been undertaken at Refreshed Issues and Options, and Emerging Preferred Options stages and First Draft Submission Sstages, a full Sustainability Appraisal has been was published alongside the <i>Waste Core Strategy Publication Document...</i>"</p>
I 3.	<p>Change to re-order list in Paragraph 1.14 (page 3):</p> <p>"The Waste Core Strategy has also been informed through a set of background documents prepared by the County Council (see below) and the evidence base for the West Midlands Regional Spatial Strategy proposed Phase 2 proposed revision:</p> <p>Key themes</p> <ul style="list-style-type: none"> • Approach to Flood Risk and Flood Risk Assessments • Arisings and Capacity • Climate Change • Identifying areas of search • Industrial Estates Study • Inland Waterways • Links with Districts & Neighbouring Local Authorities Plans and Strategies

	<ul style="list-style-type: none"> • Monitoring Baseline • Spatial Portrait • Spatial Strategy • Towards a Vision Statement • Waste Freight by Rail • Waste Sites in Worcestershire <p>Waste Streams</p> <ul style="list-style-type: none"> • Agricultural Waste • Commercial and Industrial Waste • Construction and Demolition Waste • Hazardous Waste • Municipal Waste • Waste Arisings from Healthcare and Related Activities: Clinical Waste and Low Level Radioactive Waste <p>Waste Management Facilities</p> <ul style="list-style-type: none"> • Landfill • Metal Recycling Sites • Recovering Energy from Waste: Biological and Thermal Treatment Technologies • Resource Recovery from Biodegradable Waste: Composting and Anaerobic Digestion • Types of Facilities • Waste Transfer Stations • Waste Water Treatment Infrastructure <p>Key themes:</p> <ul style="list-style-type: none"> • Towards a Vision Statement • What is Worcestershire like now and how is it likely to change? Spatial Portrait • Developing the Spatial Strategy • Industrial Estates Study (ERM) • Arisings and Capacity • Climate Change and Waste Management in Worcestershire • Links with Districts & Neighbouring Local Authorities Plans and Strategies • Waste Sites in Worcestershire • Monitoring Framework: Establishing a baseline • Inland Waterways and Waste • Waste Freight by Rail • Municipal Waste • Commercial and Industrial Waste • Construction and Demolition Waste <p>Waste Stream</p> <ul style="list-style-type: none"> • Agricultural Waste • Hazardous Waste • Waste Arisings from Healthcare and Related Activities: Clinical Wastes and Low Level Radioactive Wastes <p>Waste Management Facilities</p> <ul style="list-style-type: none"> • Types of Waste Management Facilities • Landfill • Metal Recycling • Waste Transfer Stations and Material Recovery Facilities • Resource Recovery from Biodegradable Waste: Composting and Anaerobic Digestion • Recovering Energy from Waste: Biological and Thermal Treatment Technologies • Waste Water Treatment Infrastructure "
I 4.	<p>Change to Paragraph 1.16 (page 3):</p> <p>"... Details of how these policies have informed the development of the Waste Core Strategy are</p>

	set out in the background documents prepared by the Council available on our website (www.worcestershire.gov.uk/wcs)."
2. Spatial Portrait	
I 5.	<p>Change to Paragraph 2.29 (page 13):</p> <p>"Concentrations of waste arisings broadly reflect the distribution of population and the location of industry in the county, focusing around the main urban areas²⁶."</p> <ul style="list-style-type: none"> • C&I: arisings are focused mainly in existing urban areas. Figure 5 illustrates the distribution of C&I waste arisings broken down into Lower-level Super Output Areas (LSOAs²⁷). • Agricultural waste: a detailed breakdown of distribution is not available, however arisings are in rural areas and anecdotal evidence suggests that it is more concentrated in the south of the County where horticulture is most prevalent..."
4. Location of new waste management development	
I 6.	<p>Change to Table 6 (page 42):</p> <p>"... the end-users of heat or energy produced by the facility, including heat distribution net works networks or grid connections where relevant."</p>
5. Ensuring sustainable waste management development	
I 7.	<p>Change to Paragraph 5.50 (page 59):</p> <p>"Other facilities may need to be located at a suitable distance from sensitive receptors; for example The Environment Agency requires..."</p>
6. Safeguarding existing waste management facilities	
I 8.	<p>Change to Policy WCS 13, part a) ii) (page 62):</p> <p>"...</p> <ul style="list-style-type: none"> • Suitable alternative provision is made for the waste operation at the same or higher level of the geographic hierarchy; or • The impacts can be satisfactorily mitigated."
I 9.	<p>Change to Paragraph 6.3 (page 63):</p> <p>"... or introduces a new sensitive receptor within 250 metres of such a site."</p>
7. Considering waste from all new development	
I 10.	<p>Change to Policy WCS14 (page 65):</p> <p>"Proposals for new development will be permitted where...</p> <p>c) where the existing provision is adequate."</p>
8. Implementation and monitoring framework	
I 11.	<p>Proposed change to Paragraph 8.11 (page 67):</p> <p>"Whilst all towns in the County are affected by flooding..."</p>
I 12.	<p>Change to Paragraph 8.12 (page 67):</p> <p>"... whilst Policy WCS 10 prevents unaccept-able unacceptable adverse impacts on the AONB ..."</p>
I 13.	<p>Change to Paragraph 8.30 (page 73):</p> <p>"... The RSS pPhase tTwo rRevision evidence base was based on a much higher average site</p>

	throughput of 50,000 tpa which would amount to about 18 facilities by 2025/26 ¹⁰⁰ . This is roughly half the current estimate for W waste sites required in Worcestershire (see Table 10)."
I 14.	<p>Change to Paragraph 8.31 (page 73):</p> <p>"... 58 <i>Areas of Search</i> have been identified as potentially suitable for waste management facilities.-(Ssee Annex A [change Annex A to bold]). This has assessed all known industrial and derelict employment land in the county. It has not taken into account other potentially suitable land as identified in policy WCS 4, including redundant agricultural ef or forestry buildings or co-location opportunities."</p>
I 15.	<p>Change to Paragraph 8.36: (page 74):</p> <p>"As already noted the areas of search [change areas of search to italics] do not including redundant agricultural ef or forestry buildings or co-location opportunities..."</p> <p>and</p> <p>"...Together the three sites have planning permission and environmental permits for over 500,000tpa of waste management capacity..."</p>
I 16.	<p>Change to Paragraph 8.47 (page 76):</p> <p>"... Businesses must pay for the management and disposal of this waste and over the coming years the costs of waste management are expected to increase. Costs of landfill will increase significantly due to increases in landfill tax and other factors, whereas the costs of other treatment methods is are expected to increase at a much lower rate, as illustrated in Figure 16. The Waste Core Strategy seeks to enable a greater range of waste management options in the County ..."</p>
I 17.	<p>Change to Paragraph 8.48 (page 77):</p> <p>"... See background document 'Developing the Spatial Strategy' for details of alternaitve alternative considerations."</p>
I 18.	<p>Change to Policy framework (Page 85):</p> <p>"... and WCS 14: Making provision for waste in all new development."</p>
I 19.	<p>Change to Other issues that will be monitored (Page 86):</p> <p>"Best available data on waste arisings and capacity will be monitored through the life of the strategy in order to determine changes in the capacity gap. This information will be used to update Appendix 4 [change Appendix 4 to bold] as part of the AMR. (See WO5 for more details). ..."</p>
I 20.	<p>Change to Policy Framework (Page 87):</p> <p>"... and WCS 14: Making provision for waste in all new development."</p>
I 21.	<p>Change to Indicator 19 (Page 87 and where repeated on page 89):</p> <p>"Development permitted with in 250m of waste management facilities against County Council advice."</p>
I 22.	<p>Proposed change to Policy Framework (Page 88):</p> <p>"WCS 1: Reuse and recycling; WCS 2: Other recovery; WSC WCS 3: Landfill and disposal; WCS 12: Social and economic benefits and WCS 13: New development proposed on or near to existing waste management facilities."</p>
I 23.	<p>Change to Risk Assessment (Page 90):</p> <p>"• It is possible that consultation may lead to a more lengthily lengthy design process ..."</p>
I 24.	<p>Change to Responsible Bodies (Page 90):</p>

	"... District Councils as Local Planning Authority addressing implications of general applications for planning permission."
I 25.	Change to Indicators and Targets (Page 91): "(15, 20, 21, 22) Progress towards equivalent self-sufficiency based in on figures in aAppendix 4 [change Appendix 4 to bold] or as updated in the AMR. (See indicators 15, 20, 21 , 22)"
Appendices and Annexes	
I 26.	Change to Appendix 1 (page 99): "... Hazardous waste - ... and some Waste Electrical and Electronic Equipment (WEEE). ..."

Attachment 1

Change to Appendix 4 (page 115):

Treatment (tpa) (cumulative totals)

	2010/11	2015/16	2020/21	2025/26	2030/31	2035/36
Re-use and recycling capacity gap	411,500	421,500	482,000	521,500	577,000	623,000
Re-use and recycling capacity gap	391,000	400,500	460,000	498,500	541,500	586,500
C&I (inc Agricultural waste)	58,000	81,000	107,500	137,500	172,000	210,500
C&D	127,500	105,000	105,000	105,000	105,000	105,000
MSW	186,000	195,000	229,000	238,500	259,500	267,000
MSW	165,500	174,000	207,000	215,500	224,000	230,500
Hazardous (inc Clinical and radioactive)	40,000	40,500	40,500	40,500	40,500	40,500
'Other recovery' capacity gap	240,500	253,500	268,000	283,500	300,500	318,500
C&I (inc Agricultural waste)	120,500	129,000	138,500	149,500	162,000	176,000
MSW	113,500	118,000	123,000	127,500	132,000	136,000
Hazardous (inc Clinical and radioactive)	6,500	6,500	6,500	6,500	6,500	6,500
Sorting and transfer capacity gap	0	0	0	0	0	0
C&I (inc Agricultural waste) and C&D	0	0	0	0	0	0
MSW	0	0	0	0	0	0
Hazardous (inc Clinical and radioactive)	0	0	0	0	0	0

Land requirements	25.5 ha	26 ha	29 ha	31 ha		34 ha	36 ha
Land requirements	25 ha	25 ha	29 ha	30 ha		33 ha	35 ha
Re-use and recycling	18 ha	18 ha	20 ha	22 ha		24 ha	26 ha
Re-use and recycling	17 ha	17 ha	20 ha	21 ha		23 ha	25 ha
'Other recovery'	8 ha	8 ha	9 ha	9 ha		9.5 ha 10ha	10 ha
Sorting and transfer	0	0	0	0		0	0

Landfill and disposal (tpa) (cumulative totals)

Disposal and landfill capacity gap	0	0	0	0		713,500	2,985,500
C&I (inc Agricultural waste) and MSW	0	0	0	0		290,500	1,776,000
Hazardous (inc Clinical and radioactive)	0	0	0	0		0	0
C&D	0	0	0	0		423,000	1,209,500

Note: Capacity gap figures rounded to the nearest 500 tonnes, Land requirements rounded to the nearest 0.5ha.

This appendix is based on the following assumptions:

Proportion of waste arisings managed through:	C&I (inc Agricultural waste)	MSW	Hazardous (inc Clinical and radioactive)	C&D
Minimum re-use and recycling	55%	50%	55%	25% Static plant (50% mobile plant *)
Working assumption for 'other recovery'	20%	28%	20%	-
Maximum landfill or disposal	25%	22%	25%	25%

* Mobile plant not included in the capacity gap calculations.

Further details are set out in *Worcestershire Waste Core Strategy Background Document "Arising and Capacity"*.

Figure 14:
20th September 2011
Key diagram:
Geographic hierarchy

□ Settlements

Level 1 to 5

Level 1 - Kidderminster zone, Redditch zone and Worcester zone

Level 2 - Bromsgrove zone and Droitwich Spa zone

Level 3 - Evesham zone, Malvern zone and Pershore zone

Level 4 - Bewdley zone, Tenbury Wells zone and Upton upon Severn zone

Level 5 - All other areas

— Principal Roads and Lorry Routes

== Motorways

● Motorway Junction

== Railways

≡ Rail Stations

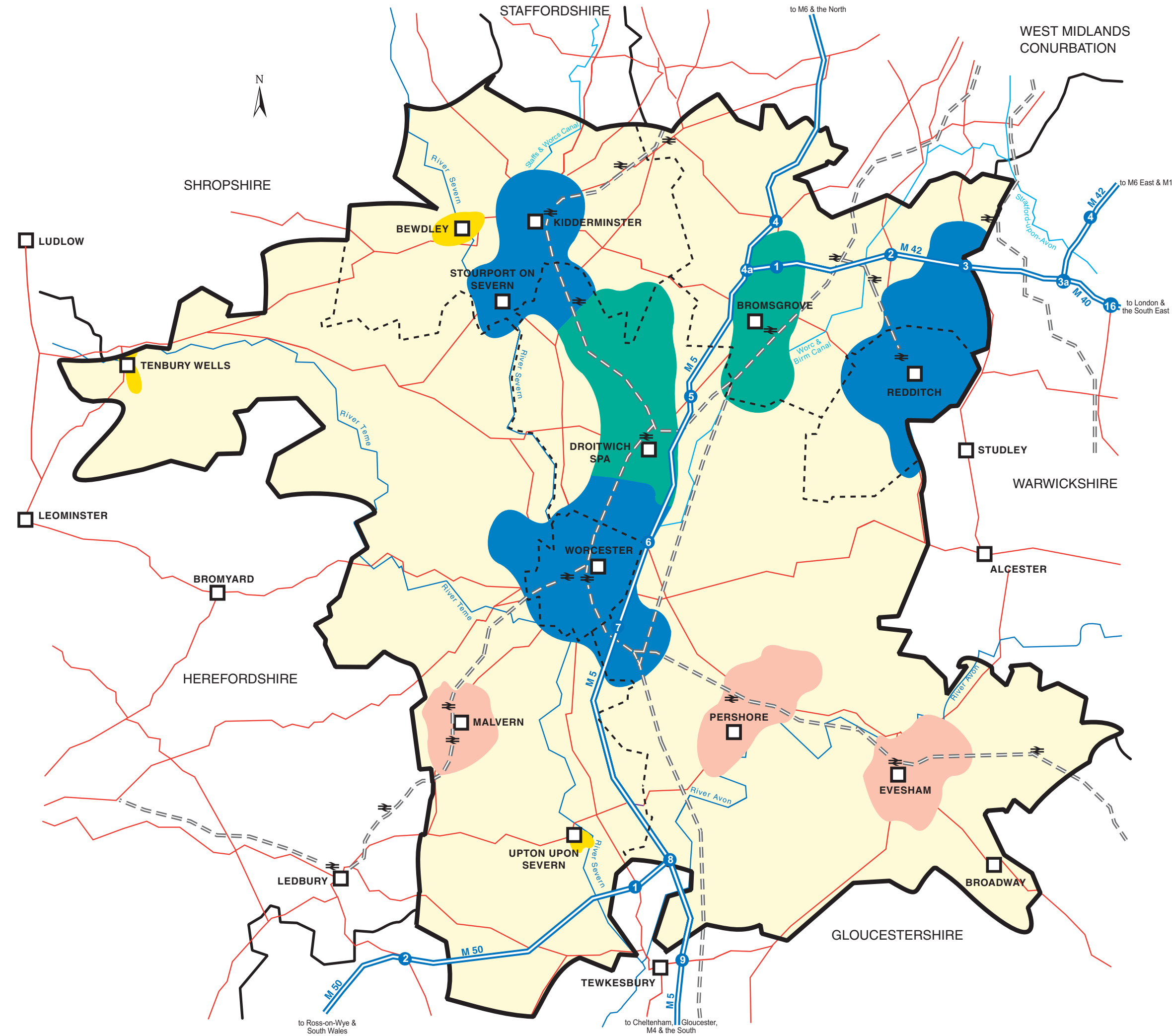
— Major Rivers

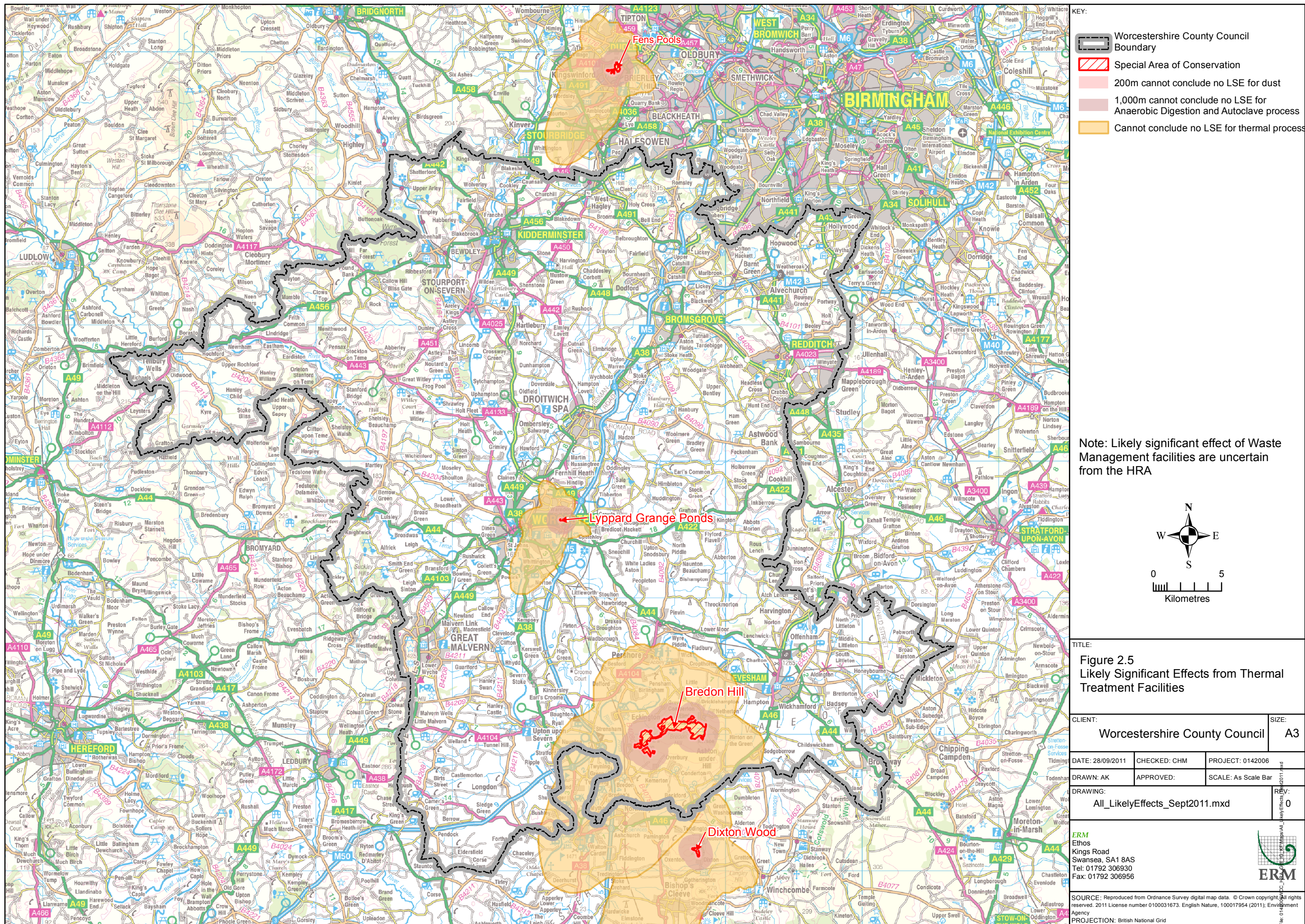
— Canals

— Worcestershire County Boundary

- - - District Boundary

This diagram is indicative only and should not be interpreted as showing specific site boundaries





Attachment 4

Figure 19. Identified areas of search

Geographic Hierarchy Level 1		
Kidderminster zone	• Birchen Coppice Trading Estate	DY11 7PT
	• Cursley Distribution Park	DY10 4DU
	• Finepoint Business Park	DY11 7FB
	• Foley Business Park	DY11 7PT
	• Foley Industrial Estate	DY11 7DH
	• Former British Sugar Site	DY11 7QA
	• Gemini Business Park	DY11 7QL
	• Greenhill Industrial Estate	DY10 2RN
	• Hartlebury Trading Estate	DY10 4JB
	• Hoo Farm Industrial Estate	DY11 7RA
	• Ikon Trading Estate	DY10 4EU
	• Oldington Trading Estate	DY11 7QP
	• Vale Industrial Estate	DY11 7QU
Redditch zone	• East Moons Moat	B98 0RE
	• Kingfisher Enterprise Park	B98 8LG
	• Lakeside Industrial Estate	B98 8YW
	• Park Farm Industrial Estate	B98 7SN
	• Pipers Road Park Farm	B98 0HU
	• Ravensbank Business Park	B98 9EX
	• Washford Industrial Estate	B98 0DH
	• Weights Farm Business Park	B97 6RG
Worcester zone A	• Area 7 Industrial Park, Norton	WR5 2AU
	• Ball Mill Top Business Centre	WR2 6PD
	• Berkeley Business Park*	WR4 9FA
	• Buckholt Business Centre*	WR4 9ND
	• Diglis Industrial Estate*	WR5 3BX
	• Great Western Business Park*	WR4 9PT
	• Newtown Road Industrial Estate*	WR5 1HA
	• Sherriff Street Industrial Estate*	WR4 9AB
	• Shire Business Park*	WR4 9FA
	• Shrub Hill Industrial Estate*	WR4 9EE
	• Top Barn Business Centre	WR6 6NH
	• Venture Business Park	WR2 4BD
	• Warndon Business Park*	WR4 9NE
	• Weir Lane Industrial Estate*	WR2 4BD
Worcester zone B	• Great Western Business Park	
	• Newtown Road Industrial Estate	
	• Sherriff Street Industrial Estate	
	• Shrubhill Industrial Estate	
Geographic Hierarchy Level 2		
Bromsgrove zone	• Bromsgrove Technology Park	B60 3--
	• Buntsford Gate Business Park	B60 4JE
	• Buntsford Hill Industrial Estate	B60 3AR
	• Silver Birches and Basepoint Business Parks	B60 3EU
Droitwich Spa zone	• Berry Hill Industrial Estate	WR9 9AU
	• Stonebridge Cross Business Park	WR9 0LW
	• Hampton Lovett Industrial Estate	WR9 0NX
	• North Street Industrial Estate	WR9 8JB
	• Rushock Industrial Estate	WR9 0NR
Geographic Hierarchy Level 3		
Evesham zone	• Bennetts Hill Business Park	WR11 8TB
	• Four Pools Industrial Estate	WR11 1XJ

	<ul style="list-style-type: none"> Vale Business Park 	WR11 1TD
Malvern zone	<ul style="list-style-type: none"> Blackmore Business and Technology Park 	WR14 3LF
	<ul style="list-style-type: none"> Enigma Business Park 	WR14 1GD
	<ul style="list-style-type: none"> Link Business Centre 	WR14 1UQ
	<ul style="list-style-type: none"> Merebrook Industrial Estate 	WR13 6NP
	<ul style="list-style-type: none"> Spring Lane Industrial Estate 	WR14 1AL
Pershore zone	<ul style="list-style-type: none"> Keytec7 Business Park 	WR10 2JN
	<ul style="list-style-type: none"> Pershore Trading Estate 	WR10 2DD
	<ul style="list-style-type: none"> Racecourse Road Trading Estate 	WR10 2EY
Geographic Hierarchy Level 4		
Bewdley zone	<ul style="list-style-type: none"> (No areas identified) 	
Tenbury Wells zone	<ul style="list-style-type: none"> Tenbury Business Park. 	WR15 8FA
Upton-upon-Severn zone	<ul style="list-style-type: none"> Upton Business Centre, Welland Road 	WR8 0SW

* Area of Search inside area where it cannot be concluded that there will be no likely significant effect from waste management development on internationally designated sites (see Appendix 3).