

Worcestershire Waste Core Strategy (Refreshed Issues and Options)- Wyre Forest District Council – Proposed Comments

Draft Vision Statement

Reference	WFDC Comment
<p>Towards a Vision Statement: Draft 27/08/08</p> <p><i>“By 2027, most waste management facilities will be in the broad area centred in and around Worcester, Kidderminster and Redditch, where most of Worcestershire’s development and future growth are concentrated”</i></p>	<p>Agree in part with the vision, in that waste management facilities should be centred on the areas which will create potentially the most waste through future development and growth.</p> <p>In terms of potential new growth in Worcestershire it appears appropriate that a higher proportion of waste management facilities will be developed within Worcester and Redditch, as they are proposed ‘Settlements of Significant Development’. However, the growth accorded to Wyre Forest (which includes Kidderminster) through the RSS is not as high as the other two settlements and it would therefore appear that the sentence is misleading.</p> <p>The RSS currently identifies through Policy W3, settlements which the region identifies as suitable for Waste Management Facilities. Included in this list alongside Worcester, Redditch and Kidderminster is Bromsgrove. Therefore it would appear sensible to include Bromsgrove within the vision as an area that potentially will have waste management facilities. This would then be consistent with the emerging RSS.</p> <p>A suggested amendment to the vision could read as follows: <i>“By 2027, most waste management facilities will be in the broad area centred in and around Worcester and Redditch, as the settlements of significant development. Facilities will also be included within Kidderminster and Bromsgrove, commensurate with the lower levels of growth proposed for these settlements.”</i></p>
<p><i>“there will be some new waste management facilities in or around Bromsgrove and Droitwich and possibly some where they would assist in the regeneration of Kidderminster”</i></p>	<p>Agree with this sentence if it can be demonstrated that facilities can assist in the regeneration of Kidderminster. Concern over the ‘wrong’ types of waste facility potentially being detrimental to the regeneration focus of the town.</p>
<p><i>“There will be fewer new facilities however in Stourport, Bewdley and Evesham and fewer still in or near Malvern, Pershore, Upton and Tenbury unless special local conditions justify</i></p>	<p>The sentence reads in almost a hierarchical way. It appears that the first list of settlements (Stourport, Bewdley and Evesham) would have potentially more waste facilities than the second list of settlements (Malvern, Pershore, Upton and Tenbury) by 2027.</p>

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<i>it.</i>	Indeed the vision indicates in an earlier sentence that “ <i>most new waste management facilities will be located close to where most wastes are produced</i> ”. It would therefore appear sensible for Malvern to be included before the towns of Bewdley and Evesham, which are much smaller settlements in comparison, and therefore should not be creating as much waste.

Draft Spatial Portrait

Reference	WFDC Comment
Para 8.1.2: “ <i>The canal network is extensive and connects systems to the north, south and east of the County. The potential for the use of water to transport materials, including waste, is considerable, if undeveloped at present.</i> ”	The notion of using the waterways as an alternative means of transport is generally supported. However, this will require careful consideration as many of the canals are important wildlife, recreation and heritage corridors which will require protection and therefore any proposals must take full account of this. The Staffordshire & Worcestershire Canal will also be a major focus for regeneration in Kidderminster town centre.
General Comment:	It may be useful to highlight the Central Technology Belt on Map 3 in the appendices which currently highlights existing major industrial areas. It may help with understanding where some of the future major investment areas could be developed, and where there could be demand for waste management facilities.

Refreshed Issues and Options Consultation – ‘How should we proceed’

Consultation Draft

Reference	WFDC Comment
Question 10: Do you agree that we should allocate the distribution of the new Commercial and Industrial and Construction and Demolition waste management capacity we need by District and Borough Council area?	Agree that waste should be distributed proportionally across all of the Districts, taking into account local circumstances, distribution of growth and working on the ‘proximity principle’
Question 11: Do you agree that this is a reasonable distribution of the new waste management facilities we need to manage Commercial and Industrial and Construction and Demolition waste?	Agree with the approach to base the requirements for waste management capacity in line with the indicative long term requirement for employment land within each District, as set out by

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	<p>the RSS Phase 2 revisions, as follows:</p> <ul style="list-style-type: none"> • Bromsgrove – 7.3% • Malvern Hills – 11.5% • Redditch 17.7% • Worcester City – 28.1% • Wychavon – 23.9% • Wyre Forest – 11.5%
<p>Question 15: We think that it would be useful to adopt the following ratios as a working basis to identify land for waste management purposes:</p> <ul style="list-style-type: none"> • Open Window Composting – 10,000t/2.5ha • Transfer Stations – 50,000t/0.5-1ha • All other waste management types – 50,000t/1ha • Landfill – No set relationship because each proposal and site will differ. Approx 10,000t/1ha @ 1m depth of tipping <p>We will need to monitor this closely to see if the planning applications which come forward in Worcestershire, or other evidence, reflects this. If not we will need to revise the strategy promptly.</p>	<p>Agree with the proposed approach to adopt the stated amounts of waste to land ratios as a working basis. Strongly support the monitoring of applications and the proposal to revise the strategy in light of any emerging evidence/local circumstances.</p>
<p>Question 17: How should we plan for beyond 2027? We think that a useful way forward would be:</p> <ul style="list-style-type: none"> • To project the current RSS calculations forward for 10 years to 2036 in the light of new evidence and our own monitoring of the plan • To identify the scale of new waste management facilities needed to address these projections and the land area needed on the same basis throughout the period 2007 – 2026 • To identify broad areas where these facilities would be needed but which would only be brought forward if all other appropriate 	<p>No. The District Council feel that it would be difficult to provide clear/meaningful guidance within this longer time frame. It is felt that an earlier review, in light of any changing circumstance, would be more appropriate and therefore the plan should be developed up until 2027.</p>

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<p>allocations had been taken up first or could be shown to be unsuitable or unavailable</p> <ul style="list-style-type: none"> • To reassess all of these in the light of new evidence and our own monitoring of the Strategy at 5-yearly intervals <p>Do you agree?</p>	
<p>Question 20: Do you agree that we should develop the Waste Core Strategy on the basis of the following options: That new waste development is appropriate any where in the Green Belt when in accordance with the objectives of PPG2 To focus on development in urban locations throughout Worcestershire with justified minimal development in rural areas To establish primarily larger waste management facilities To focus on centralising facilities, but with dispersed facilities if justified To incorporate the adopted Best Practicable Environmental Option (BPEO) Strategy into the Waste Core Strategy</p>	<p>Agree with the approach to developing the strategy based on the options listed, subject to the options for larger and centralised facilities not prejudicing the proximity principle.</p> <p>Explanation of implications of not incorporating the BPEO strategy would be of use and help to understand the options more fully.</p>
<p>General Comment – Hazardous Waste (P19) The document indicates that <i>“In light of the draft RSS policy we do not therefore intend to include policies in the Waste Core Strategy to identify new sites specifically for hazardous Waste Management. We intend instead to set up a policy framework which would enable the Council to determine applications for planning permission based on any such facilities should they be made, but not to actively propose that they should be established in Worcestershire during the life of the strategy.”</i></p>	<p>Support the approach regarding Hazardous Waste, as outlined within the document.</p>
<p>General Comment – Possible Future Issues (P48)</p>	<p>Under ‘Possible Future Issues’ The list of important documents to date, located on p.48, reads as follows:</p> <ul style="list-style-type: none"> • RSS Phase 3 revision

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	<ul style="list-style-type: none"> • River Severn Basin Management Plan • South Worcestershire Joint Core Strategy • Bromsgrove Core Strategy • Redditch Core Strategy • Longbridge Area Action Plan <p>The District Council is concerned that the Wyre Forest Core Strategy is not included within this list.</p>
General Comment – Municipal Solid Waste	<p>Concern that there is no approach to deciding on how Municipal Solid Waste management facilities could potentially be split throughout the County.</p>