

Worcestershire Waste Core Strategy Emerging Preferred Options – Proposed Consultation Responses

SPATIAL PORTRAIT

Document Reference	WFDC Comment
<p>p.6: “In general, waste sites tend to be clustered in or near towns in the north of the County with few existing waste sites in Malvern Hills District and Worcester City”.</p> <p>This is further identified by Map 4 – Existing Waste Sites.</p>	<p>It is apparent that the north of the County has a disproportionate amount of waste facilities, when compared to the southern areas of the County, with a specific concentration around Kidderminster and Stourport-on-Severn.</p> <p>It is therefore considered that it will be important to locate new waste facilities accordingly across Worcestershire, in order to address the current imbalance that exists between the north and the south of the County. This would be in line with the proximity principle and the rationale of reducing the travel of waste, as advocated in the Strategy.</p> <p>This would also support the need for future facilities to be located primarily in the County’s principal settlement, Worcester.</p>
<p>p.7: “Forestry remains the principal land use of the Wyre Forest”</p>	<p>Sentence is confusing and requires re-wording.</p>

VISION STATEMENT

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<p>p.12: “We should look at making a high provision for waste management; if we do anything less, we will make it difficult for the industry to get the planning permission it needs and we will not achieve our Vision”</p> <p>Principle 7. “ For businesses waste will mean opportunity and for Council’s it will mean encouraging new waste management facilities”</p>	<p>Whilst it is accepted that provision for waste is an important issue, this needs to be carefully balanced with other material considerations. The onus should be on ensuring that the right type of development at the right scale and location is promoted rather than providing a blanket approach of “making a high provision for waste and encouraging new waste management facilities”, which could cause difficulties if proposals are considered unacceptable.</p>

OBEJECTIVES

Document Reference	WFDC Comment
p.13: Objectives	<p>The main guiding principle that was included in the Refreshed Issues and Options Document was:</p> <p>“To conserve and enhance the natural, built and historic environment and the amenities, health and safety of everyone who lives and/or works in Worcestershire...This will be the ultimate test of whether development proposals will be acceptable or not.”</p> <p>It is considered that this objective should be included as part of the Waste Core Strategy.</p>
p.13: Objectives	<p>Reference to the proximity principle and adopting a precautionary approach were also included in the Refreshed Issues and Options document and it is considered that these could be usefully included here.</p>

TOWARDS A STRATEGY

Document Reference	WFDC Comment
<p>p.29: General Principles:</p> <ul style="list-style-type: none"> • To concentrate waste development in urban locations, with justified minimal development in rural areas; • To focus on centralising facilities but with dispersed facilities if justified; • To establish primarily larger facilities; and • That waste development would be appropriate in the Green Belt when in accordance with national policy 	<p>General support for the following principles outlined</p> <p>Insert ‘and local’ after ‘national’ in fourth bullet point.</p>

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<p>This section also provides an indication of the amount of land that may be required for Waste Management facilities within Worcestershire through the lifetime of the Strategy. The amounts are as follows:</p> <ul style="list-style-type: none"> • 14ha to manage Commercial and Industrial Waste • 7.5ha to manage Municipal Solid Waste • 2ha to manage biodegradable waste • 6ha for waste transfer stations • Potential additional land to manage Commercial and Industrial Waste and Non-Directive Biodegradable Waste 	<p>Amount of land required for future waste management is noted.</p>
<p>p.30 “The RSS is quite clear, that there is a hierarchy of where development should be focused. There is no evidence to justify not following this.”</p>	<p>Agree with this approach. Development for waste facilities should be in line with the levels of development proposed for each area in the County, and should also focus on the proximity principle.</p>
<p>p.30 A possible Hierarchy of Broad Areas for Allocating Capacity:</p> <ul style="list-style-type: none"> • Worcester and its expansion areas • Redditch and its expansion areas in Worcestershire • Kidderminster, Bromsgrove and Droitwich and the Central technology belt from and including Longbridge and Malvern • The major market towns: Evesham, Stourport and Bewdley • Tenbury, in its role as market town and part of the Rural Regeneration Zone (RRZ) • Pershore and Upton • Limited rural development where proximity to waste streams justifies it particularly in the RRZ 	<p>Generally agree with the hierarchy identified. However, it is considered that Bewdley differs in form and function to that of Evesham and Stourport-on-Severn and should be included lower down the hierarchy. Bewdley would sit more comfortably with Tenbury (as it is also a market town located in the RRZ) or with Pershore and Upton, which have similar characteristics and constraints to development.</p>

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<p>p.31: Commercial and Industrial Waste (C and I)</p> <p>For C and I waste, the strategy proposes to use the RSS policy for new employment land as indicators for where most new development should take place, at a broad level. This is as follows:</p> <p>Worcester City – 28.1% Wychavon – 23.9% Redditch – 17.7% Wyre forest – 11.5% Malvern Hills – 11.5% Bromsgrove – 7.3%</p>	<p>General support for this approach. However, this must also be considered in line with where current waste is being generated from and also where current facilities exist and seek to address any current location 'gaps'.</p>
<p>p.32 “ We intend to prepare Options which would explore developing most new facilities on existing and future industrial estates. The single exception is likely to be for windrow composting.”</p>	<p>Support the approach for developing new facilities on existing and future industrial estates. Preference should also be given to developments on previously developed land.</p>
<p>The County Council intend to develop the strategy by identifying a long list of possible locations for new facilities. They have commissioned research to investigate the suitability of existing industrial estates in Worcestershire for future waste management facilities, the availability of the land and attitude of estate owners and managers which shows that sufficient estates exist and will be available.</p> <p>They intend to produce a series of plans showing different ways of distributing how much capacity we need and relating this to the research on the availability of land. The end product will be a set of alternative Options on a map base during 2010 and the analysis of which Option is preferred.</p>	<p>The District Council wishes to be involved in the consultations on the proposals.</p>

PROPOSED POLICIES

Document Reference	WFDC Comment
P.35: “ New development will be assessed against all relevant national and regional policies”	Agree with this sentence but should include a reference to local policies as well, most notably the District Council’s Local Development Framework.
p.36: “ For the purpose of developing ideas we propose therefore to include a requirement that facilities over 1000sqm gain 10% (or more, if local targets are higher) of energy supply from alternative or renewable sources. Your comments are particularly invited on this”	This would be broadly in line with Wyre Forest’s emerging Core Strategy and so is supported.
Draft Policy Direction WCS1: Ensuring Sustainable Development “Our aim is to address the waste management implications of the RSS and to develop facilities as close as possible to the source of current and future arisings.”	Support for this approach
Draft Policy Direction WCS2: Spatial Hierarchy “The Waste Core Strategy will provide sites in accordance with the following order of priority: <ul style="list-style-type: none"> • The Settlements of Significant Development of Worcester and Redditch • The growth and regeneration of Kidderminster, Bromsgrove and Droitwich • The high technology corridor between and including Longbridge and Malvern • The market towns of Evesham, Bewdley and Stourport • Tenbury, Pershore and Upton • The rural regeneration zone • Other rural areas 	As above - Generally agree with the hierarchy identified. However, it is considered that Bewdley differs in form and function to that of Evesham and Stourport-on-Severn and should be included lower down the hierarchy. Bewdley would sit more comfortably with Tenbury (as it is also a market town located in the RRZ) Pershore and Upton, which have similar characteristics and constraints to development.

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<p>P.40 “Do you think we should develop Preferred Options on the basis of defining what waste management facilities would be acceptable where on the basis of:</p> <ul style="list-style-type: none"> a) Their size b) by broad kind c) by specific type d) any other method 	<p>It is considered that in deciding what sorts of facilities would be located where – options should be based on a combination of the options listed (Size, kind and specific type) as all of these influence the suitability of any location.</p>
<p>Draft Policy Direction WCS3: Future Waste Site Allocations “We think that we need a policy that sets out where the different kinds of waste management facility would be acceptable. We think that the best way of doing this would be to develop a Key Diagram which shows, in broad terms, on a map base, where new waste management facilities will be permitted. Potential developers would therefore be able to apply for planning permission with some confidence, subject to the need to assess the effect of the specific proposal on a particular site.</p> <p>In the interests of sustainable development, we think a policy also needs to demonstrate a commitment to using the most appropriate transport routes within and around the County and to implement sustainable modes and methods of transportation.”</p>	<p>The District Council wish to be involved in the consideration of sites for future waste management facilities, which will appear on the Key Diagram. Without seeing the Key Diagram the District Council is unable to comment fully on this draft policy direction.</p> <p>Clarification is also required on the reference to ‘broad terms’, as this is fairly ambiguous at present.</p> <p>Support for demonstrating a commitment to using the most appropriate transport routes.</p>
<p>Draft Policy Direction WCS4: Unallocated Sites “We think that such a policy would include that proposals for the waste management related development on sites not identified in the Waste Core Strategy could be permitted where they met certain criteria such as that:</p> <p>They are consistent with the appropriate waste planning policies and objectives, are compatible with moving the management of waste up the waste hierarchy and do not compromise the achievement of the strategy.</p>	<p>It is considered that there should be a caveat to this which states that all other locations, identified in the Waste Core Strategy, have been considered first, prior to allowing any unallocated sites to be given permission.</p>

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<p>p.42: We need to make provision that Greenfield sites may be acceptable provided that the proposal does not result in significant adverse impact on the countryside or its functions, that proposals would be compatible with their setting and would not have unacceptable direct or indirect impacts on matters of acknowledged importance in national, regional or local policy and that they would not significantly conflict with other spatial planning objectives in the LDF.</p>	<p>Wyre Forest District’s emerging Core Strategy seeks to direct development to previously developed land and so any future Greenfield proposals would be in conflict with the Development Strategy proposed for the District, and are likely to not be supported.</p>
<p>Draft Policy Direction WCS5: How much waste treatment capacity do we need? “Such a policy would require that sufficient waste management capacity will be provided in Worcestershire before 2027 to manage the equivalent of the waste arisings within the County.</p> <p>The targets for waste reduction are included in this policy.</p> <p>Unimplemented Permissions:</p> <p>“There is significant potential waste management capacity in current, but unimplemented permissions in the County. There is a time limit on each by which it must be commenced. We anticipate, however that most of these will be implemented and will therefore contribute to meeting the “capacity gap”. There is a risk that if we do not recognise these permissions we will overestimate how many sites we need to identify. We think the solution will be to safeguard these sites until they are either implemented or can be judged no longer necessary for waste management purposes. This will have the effect of reducing the number of new sites we need to identify.</p>	<p>Support the approach to ensuring sufficient waste capacity is provided in Worcestershire to meet the arisings.</p> <p>Strongly support this approach. By safeguarding areas which already have planning permission this could halve the amount of land that will be required to be found for waste management sites during the lifetime of the strategy.</p>

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<p>Draft Policy Direction WCS6: Safeguarding</p> <p>“Obtaining Planning Permission and identifying appropriate sites for waste management related development can be difficult. It is therefore necessary to ensure that operational sites, sites with planning permission that have not yet been implemented and areas proposed for waste facilities are not compromised by inappropriate development in their proximity.</p> <p>We think that such a policy could state that proposals for defined kinds of development, within a defined distance on existing or proposed waste facility or site identified in the Key Diagram will be permitted provided that:</p> <ul style="list-style-type: none"> • The operation of the waste management facility is not or would not be significantly affected; or • The waste management facility, proposed or existing is no longer required or is not suitable located in relation to its function or impacts and either that there is adequate and appropriate capacity in the County or in proximity to the waste now and in the future to manage the waste the facility treats; or • The existing facility can be relocated to a more suitable and equally sustainable location; or • The development proposal would not suffer unacceptable impacts as a result of the operation of the waste facility. <p>The corollary being that if the above criteria are not met, that we will object to the proposal and will expect the District Council to refuse it on the grounds that it would compromise the achievement of the Waste Core Strategy.</p>	<p>Agree in part to this approach. Current sites and sites with unimplemented planning permissions should be safeguarded for waste management uses. However, as the document does not identify future sites, or provide information as to the level, type and scale of development that might be proposed the District Council is unable to comment on the suitability of safeguarding sites that might appear on the Key Diagram.</p> <p>Before commenting fully, distances need to be defined (and a methodology for defining these distances identified) and sites need to be identified on the Key Diagram. Until this has happened it is difficult to fully assess the suitability of the draft policy.</p> <p>Care also needs to be taken that other development is not stifled within areas due to the identification of a site as being suitable for Waste Management Facilities. There would need to be some certainty that waste management facilities were to be implemented at a site, before being able to refuse permission on this basis alone.</p> <p>The District Council wishes to retain its independency to decide applications into the future. The Waste Core Strategy will form an important document in the decision making process, however, it will be important that the District Council takes on board all material considerations when deciding applications.</p>

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<p>Draft Policy Direction WCS 7: Assessing the Waste Implications of New Development</p> <p>The policy proposes that for developments of a certain size (e.g 10 or more dwellings, commercial development above 500sqm) must:</p> <ul style="list-style-type: none"> • Include facilities for the occupiers to separate and store the wastes produced to enable other recycling or composting unless adequate provision exists already; and • Be accompanied by a waste audit which must include specific details pertaining to how the waste generated from the development will be dealt with. 	<p>Support for this approach but consider that all new developments should make provision for waste recycling / storage</p> <p>Whilst the second bullet point is broadly welcomed there is a need to consider practicalities in terms of the DC process.</p>
<p>Draft Policy Direction WCS8: What kind of facilities do we need?</p> <p>Such a policy would set out the sufficient types of facility and technology will be permitted to reflect and support the waste management needs of the economy of Worcestershire. Proposals would be required to:</p> <ul style="list-style-type: none"> • Identify the kind and broad origin of the wastes to be managed; and • Demonstrate that the wastes involved could not have been managed more sustainably by using a solution at the higher level of the waste hierarchy. 	<p>General support for this policy approach</p>
<p>Draft Policy Direction WCS9: Landfill</p> <p>Such a policy could specify that no further planning permissions for Non Inert landfill sites will be granted unless certain provisions are met. The could include that:</p> <ul style="list-style-type: none"> • There is clear evidence that there will be a shortfall during the life of the Strategy • There is no suitable waste management option at a higher 	<p>Support for this policy approach. By restricting landfill permissions, the onus will be to deal with waste in a more sustainable fashion.</p>

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<p>level in the waste hierarchy in Worcestershire for the wastes proposed to be landfilled</p> <ul style="list-style-type: none"> • That the proposal is essential for operational reasons and is the only demonstrable option. <p>Provisions may need to be made for new Inert Landfill sites within the County, under certain criteria.</p>	
<p>Draft Policy Direction WCS10: Energy from Waste</p> <p>It is considered that energy from waste could be a useful part of the strategy, provided that safeguards are in place to ensure that energy from waste proposals do not crowd out recycling and that special issues relating to it, such a potential pollution and health risks, are properly addressed by the statutory bodies responsible.</p> <p>Any such policy will need to specify that Planning Permission will be granted for energy from waste proposals, provided that it was basically sustainable. We would need to set criteria to require at least that:</p> <ul style="list-style-type: none"> • The sorting of waste is carried out; • Energy recovery is maximised • Value recovery from by-products is maximised 	<p>Any policy chosen for this specific area will require careful consideration and should be based on the most recent information available.</p> <p>Disagree, consider that proposals will need to be fully sustainable. Dislike the use of the word 'basically'. Extra criteria regarding the health and safety and pollution implications of this type of development could also usefully be included here.</p>
<p>Draft Policy Direction WCS11: Managing the Impact of Waste Management Related Development</p> <p>Such a policy could state that proposals for waste management related development in Worcestershire will be permitted where they do not have unacceptable impacts on the natural resources (e.g. air, water and soil) and environmental and social, cultural or economic assets of Worcestershire.</p>	<p>Consider that this is a useful policy to include and reference should explicitly be made to the types of features that need protection such as AONB's, SSSI's and designated Wildlife Sites.</p> <p>Reference should also be made to any Air Quality Management Areas that exist throughout the County.</p>

Document Reference	WFDC Comment
Within this policy requirement could be made that any adverse impacts on amenity (caused by, for example, noise, odours, fumes, dust, litter, hours of operation or from the cumulative effect from any such impacts) must be minimised by effective mitigation measures.	

GENERAL COMMENTS

Document Reference	WFDC Comment
<p>Other matters of concern The document identifies that it might be useful to include references to a number of other waste related issues within the Core Strategy. This includes:</p> <ul style="list-style-type: none"> • The Restoration and After-care of Waste Sites • Control of Landfill Mining • Control of “landscaping” and “noise mounds” • Description of what Councils in Worcestershire should require in connection with waste deposited under Permitted Development (PD) rights • Clarification of a County-wide approach to Local Recyclable Collection Points <p>The document asks whether or not it would be useful to develop Preferred Options which include policies to address these issues.</p>	<p>It is considered that a policy steer on these matters would be a useful addition to the Strategy. A County-wide approach to these issues would ensure consistency throughout Worcestershire.</p> <p>More detail on the requirements for what Councils in Worcestershire should require for waste deposited under PD rights and the approach to Local Recyclable Collection Points would be required before a full comment could be made. This will need to be considered in consultation with all of the District’s in Worcestershire to ensure that any policy is appropriate and useable.</p>
<p>Monitoring Indicators</p>	<p>It would be useful to include contingency planning indicators so that if the Strategy is not being realised then actions can be taken.</p>
<p>General Comment</p>	<p>The Council reserves the right to make further comment during the preparation stages and once the final document is published.</p>