

Worcestershire Waste Core Strategy
First Draft Submission Consultation – Proposed Consultation Responses

VISION

Document Reference	WFDC Comment
<p>The vision:</p> <p><i>By 2027 waste production in Worcestershire will be minimised and what is produced will be regarded as a source of useful material to be reused. So far as possible this resource will be managed in Worcestershire itself, in accordance with the principles of sustainable development and the waste hierarchy. There will be sufficient waste management capacity in Worcestershire to enable waste to be treated as a resource and support the local economy without compromising the County’s distinctive environmental, social and cultural assets. These facilities will be located where they minimise the need to move waste by road and where they are best suited to serve the needs of local communities and the local economy. They will be designed to adapt to and mitigate climate change and will reflect the characteristics of the local area.</i></p>	<p>WFDC are supportive of the vision outlined within the consultation document.</p>

OBJECTIVES

Document Reference	WFDC Comment
<p>The consultation document provides nine objectives which will help to deliver the vision for the plan. The objectives are:</p> <p>W01: To base our decisions on the principles of sustainable development and the need to reduce greenhouse gas emission and mitigate climate change</p> <p>W02: To protect and enhance the county’s natural resources, environmental, social, cultural and economic assets and the character and amenity of the local area</p> <p>W03: To do everything possible to minimise waste production and make driving waste up the waste hierarchy the basis for waste management in Worcestershire</p> <p>W04: To ensure that the waste implications of all new development in Worcestershire are taken into account</p> <p>W05: To address the “Capacity Gap” between how much waste management capacity we have and what we need over the plan period to 2027</p> <p>W06: To safeguard existing waste management facilities from incompatible development</p>	<p>WFDC are supportive of the objectives outlined within the consultation document.</p> <p>WFDC consider that the phrase ‘<i>To do everything possible</i>’ should be deleted</p>

<p>W07: To reduce waste miles by road where possible</p> <p>W08: To encourage communities in Worcestershire to take responsibility for their own waste and involve all those affected as openly and effectively as possible</p> <p>W09: To develop a waste management industry that contributes positively to the local economy</p>	
---	--

BROAD GEOGRAPHIC HIERARCHY

Document Reference	WFDC Comment
<p>The document proposes a Geographic Hierarchy outlining the settlements within the County, which the strategy is based on. The hierarchy reflects the current trends within the County in terms of current waste facilities and arisings. The hierarchy will be used to target waste facilities to the most sustainable areas first.</p> <p>The proposed Hierarchy is as follows:</p> <ol style="list-style-type: none"> 1. Worcester and its expansion areas, Kidderminster area and Redditch 2. Bromsgrove, Droitwich and Malvern 3. Evesham and Pershore 4. Tenbury Wells and Upton-upon-Severn 5. Rural Areas <p>The two areas of the Geographic Hierarchy that specifically affect Wyre Forest District are 1 and 5.</p>	<p>Kidderminster Area</p> <p>The document identifies the Kidderminster area as including Kidderminster, Stourport-on-Severn and Bewdley. All three of the towns are included under this one area as this reflects the inter-relationships between the three towns. It also reflects the waste arisings and management that currently exists within the District. Although the hierarchy includes all three towns, the areas of search for new facilities are focused primarily on Kidderminster, as the strategic centre of the three. There appears to be recognition of the role that Kidderminster plays in accommodating and dealing with the waste arisings of the three areas, given their relative proximity</p> <p>WFDC consider this to be an acceptable approach to waste management within the District. Crucially, the areas of search identified for potential new waste management facilities are focussed primarily in Kidderminster, identifying the role that the largest town, with the available sites, plays in dealing with the waste arisings of the three towns within the District. This approach is also considered more acceptable than previous iterations of the document which sought to include Bewdley as a stand alone settlement much higher up in the hierarchy.</p> <p>Rural Areas</p> <p>The other category of significance is the rural areas, identified as the last stage of the hierarchy.</p> <p>WFDC generally agree with what is outlined in terms of the rural areas falling at the end of the hierarchy. However, it may be useful to include more comment on the hierarchy and how it is proposed to be used. For example, identifying that rural areas would be the last resort or would only be acceptable as locations for waste facilities in certain, exceptional, circumstances.</p>

<p>(P.45) The document provides information on the proposed split of new waste management facilities, by the different areas highlighted in the broad geographic hierarchy.</p> <p>For the Worcester, Kidderminster and Redditch areas the plan suggests an aspirational distribution of 20% for each area.</p> <p>However, the document also identifies 'actual' distribution for new waste management facilities, suggesting the following percentages between each of the three main areas:</p> <ul style="list-style-type: none"> • Worcester and its expansion areas: 17% • Kidderminster, Stourport and Bewdley: 27% • Redditch: 14% 	<p>WFDC object to the 'actual distribution' levels and feel that the percentage of each of the 'main' areas to accommodate new facilities should remain aspirational at 20%. Reference to actual distribution should be removed as there is a danger that this makes the plan too prescriptive.</p> <p>The remaining aspirational targets allow the plan to be flexible and responsive to change. Furthermore, it would appear that the figures of 'actual' distribution are based on sites currently available, which is not considered to be a plan-led approach; as it does not factor in new sites that may come forward as part of the LDF process. The potential for new sites to come forward is recognised as an important consideration in para 4.28.</p> <p>The other concern is that by setting actual distribution figures it could end up stifling development, especially in the three 'main' areas, this is because if any area reached their 'actual distribution' they could conceivably not permit any further waste development. By keeping the figures aspirational it allows the plan to remain flexible to meet demand as it arises.</p>
---	--

AREAS OF SEARCH

Document Reference	WFDC Comment
<p>The strategy has identified potential locations that might be suitable for waste management facilities, the sites identified in Wyre Forest District are:</p> <p>17. Gemini Business Park</p>	<p>Generally there are no major concerns with the identified areas of search for the Wyre Forest District. Future development for waste should be targeted to the more industrial sites before considering other options</p> <p>With regards to the areas of search as indicated opposite, WFDC have the following comments:</p>

Agenda Item No. 10.3
Appendix 2

Document Reference	WFDC Comment
18. Oldington Trading Estate 19. Birchen Coppice Trading Estate 20. Foley Business Park 21. Hoo Farm Industrial Estate 22. Foley Industrial Estate 23. Former British Sugar Site 24. Vale Industrial Estate 25. Greenhill Industrial Estate 27. Blackstone Quarry	<p>23. Former British Sugar Site – this site is likely to be redeveloped as a mixed use area, therefore the proximity of residential development within this location will need to be considered with regard to any new waste management facility.</p> <p>25. Greenhill Industrial Estate – there are concerns about identifying this site as an area of search due to the fact that the site is bounded on all sides by residential development. Furthermore, this site fulfils a quasi-retail function and there are concerns regarding how a waste management facility would sit in the context of the current occupiers, as well as the adjacent residential neighbours.</p> <p>For clarity it might be worth re-arranging the numbers for Ikon Trading Estate (26) and Blackstone Quarry (27) so that all of the sites within the District are ordered sequentially. This would make it easier for readers; it might also be worthwhile including the District that each of these sites falls within to aid the clarity of the document.</p>
<p>The document also outlines which sites are considered to be suitable for ‘large’ waste management facilities, they are as follows:</p> <ul style="list-style-type: none"> ▪ Hartlebury Trading Estate ▪ Berry Hill Industrial Estate ▪ Hampton Lovett Industrial Estate ▪ Vale Business Park ▪ Keytec 7 Business Park 	<p>Although none of the sites identified for ‘large’ waste management facilities are located within Wyre Forest, it is considered that there needs to be an explanation of what constitutes a ‘large’, ‘medium’ and ‘small’ waste management facility. It is difficult to fully consider and respond to the consultation without awareness of the size of facilities that may be considered suitable within each of the identified areas.</p>

PROPOSED POLICIES

Document Reference	WFDC Comment
<p>Policy WCS1: Location of waste management development:</p> <p>This policy seeks to allow new waste management facilities to be developed in the ‘areas of search’ subject to the proposal conforming to the other policies of the Development Plan.</p>	<p>WFDC support the approach outlined in WCS 1. It is imperative that any future developments are assessed against all aspects of the Development Plan, including the District’s LDF.</p> <p>WFDC feel that there should be a preference for ‘areas of search’ to</p>

Document Reference	WFDC Comment
	be developed first, with a requirement put onto developers to provide a rationale as to why a proposal could not be suitably accommodated in the areas of search. This could usefully be along the lines of a sequential approach to site selection.
<p>Policy WCS2: Ensuring Waste Management Development</p> <p>This policy seeks to ensure that proposals for the treatment and management of waste contribute to the delivery of sustainable development in Worcestershire by delivering positive social, economic and environmental impacts where possible and not having any unacceptable negative impacts, including cumulative and cross boundary affects. Then policy includes requirements such as mitigating against climate change and taking into account flood risk.</p>	WFDC support the thrust of Policy WCS 2 which seeks to ensure that waste is dealt with in the most sustainable way. The principles in this policy appear to align with the objectives and policies of the District's Core Strategy, specifically CP01: Delivering Sustainable Development Standards.
<p>WCS3: Managing waste arising from all new development</p> <p>This policy places a requirement on all new developments to demonstrate how waste arising from operations associated with construction, demolition, and groundworks will be reduced, re-used and recycled. Additionally, the policy places a requirement for all new development to incorporate facilities into the design that allow occupiers to separate and store waste for composting, recycling and recovery, unless it can be demonstrated that the existing facilities are adequate.</p>	WFDC are generally supportive of this policy. The principles in this policy appear to align with the objectives and policies of the District's Core Strategy, specifically CP01: Delivering Sustainable Development Standards and is considered to be mutually reinforcing.
<p>WCS4: Managing the impact of new waste management development</p> <p>This policy seeks to manage any impact that the development of a waste management facility would have. It includes a comprehensive list detailing affects on areas such as landscape character, the historic environment and visual amenity. Proposals that do not comply with the stated criteria will not be permitted.</p>	WFDC support this policy, which seeks to ensure that the impacts of new waste management proposals are mitigated against and to not allow development where these criteria are not met.
<p>WCS5: Recovering energy from waste material</p>	This policy provides an extra level of detail for this specific type of management facility and is welcomed. This policy seeks to provide

Agenda Item No. 10.3
Appendix 2

Document Reference	WFDC Comment
<p>The Waste Core Strategy promotes the reuse and recycling of resources. Where this is not possible the recovery of energy from residual waste is expected. Recovering energy from the remaining waste that cannot be recycled is an important part of the waste hierarchy and this policy provides the framework for considering recovering energy from waste proposals.</p>	<p>more detail on the process of energy from waste.</p> <p>WFDC consider that the policy could also usefully make reference to the need to have regard to the other policies of the Development Plan, especially with regard to WCS4</p>
<p>WCS6: Landfill</p> <p>This policy seeks to prevent further permissions for landfill sites within the County, unless there is a shortfall in capacity or the proposals is essential for operational reasons.</p>	<p>WFDC support Policy WCS6 as a useful tool in preventing and limiting unnecessary new landfill sites. This provides the focus for ensuring techniques are developed that recycle and re-use waste and do not focus on landfill</p>
<p>WCS7: Impact of new development on existing or proposed waste management facilities</p> <p>This policy seeks to protect existing or permitted waste facilities by ensuring that any new development within a 250m radius does not affect the waste management facility. Any development that does not reduce adverse impacts on the waste facility will not be allowed.</p> <p>In order to aid with the implementation of this policy the County have mapped all current and permitted waste management facilities highlighting the 250m buffer.</p>	<p>The Council are concerned about this policy. It is considered that setting an arbitrary zone around existing or permitted waste management facilities places an onerous burden on developers.</p> <p>It is recommended therefore that this could be usefully re-branded as a 250m consultation zone so that any issues with regard to affects on the waste facility would still be captured and mitigated through consultation with Environmental Health Officers and the Environment Agency.</p> <p>The Council are supportive of this mapping facility as a useful tool for implementing the policy. It should be noted however, that the site on Bewdley Road, Stourport is no longer operational and is subject to development pressure for residential development.</p>

GENERAL COMMENTS

Document Reference	WFDC Comment
<p>Figure 2b refers to potential development figures for future residential development across the County.</p>	<p>The proposed figures for development should be updated to reflect the most recent publication of the Wyre Forest Core Strategy. The indicative figures for residential development are as follows:</p>

Agenda Item No. 10.3
Appendix 2

	<p>Kidderminster: 2,400 Stourport-on-Severn: 1,200 Bewdley and Rural Areas: 400</p>
<p>The document identifies that there will be a need to upgrade and improve the household recycling centre in Kidderminster (para 2.34)</p>	<p>Support for this planned improvement</p>
<p>Paragraph 2.35 suggests that Kidderminster will need some increased capacity to deal with waste water</p>	<p>WFDC question this sentence. The District Council's Water Cycle Strategy identified sufficient capacity in Kidderminster at Oldington Treatment Works.</p> <p>Furthermore, the background study to inform the Waste Core Strategy (Waste Water Treatment Infrastructure) identifies on p.55 that the Oldington Treatment Works is at low risk in all categories on the table, suggesting there is sufficient capacity to meet demand.</p>
<p>The document identifies that there is no capacity gap for clinical waste, non-nuclear and nuclear industry low-level radioactive waste and therefore no new facilities need to be planned for.</p>	<p>WFDC support the notion that these facilities should not be specifically catered for and any application submitted should be decided through the development control process with full regard had to the Development Plan.</p>