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

Draft Vision Statement

Reference	WFDC Comment
Towards a Vision Statement: Draft 27/08/08 "By 2027, most waste management facilities	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.
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"	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.
	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.
	A suggested amendment to the vision could read as follows: "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."
"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"	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.
"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	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.

Reference	WFDC Comment
it."	Indeed the vision indicates in an earlier sentence that "most new waste management facilities will be located close to where most wastes are produced". 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	
and connects systems to the north, south and east of the County. The potential for the use of water to transport materials, including	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?	,
Question 11: Do you agree that this is a reasonable distribution of the new waste management facilities we need to manage	Agree with the approach to base the requirements for waste management capacity in line with the indicative long term
Commercial and Industrial and Construction and Demolition waste?	requirement for employment land within each District, as set out by

Reference	WFDC Comment
	the RSS Phase 2 revisions, as follows:
	Bromsgrove – 7.3%
	Malvern Hills – 11.5%
	Redditch 17.7%
	Worcester City – 28.1%
	• Wychavon – 23.9%
	Wyre Forest – 11.5%
Question 15: We think that it would be useful to adopt the following	Agree with the proposed approach to adopt the stated amounts of
ratios as a working basis to identify land for waste management	waste to land ratios as a working basis. Strongly support the
purposes:	monitoring of applications and the proposal to revise the strategy in
Open Window Composting – 10,000t/2.5ha	light of any emerging evidence/local circumstances.
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	
We will need to meniter this placely to see if the planning applications	
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.	
Question 17: How should we plan for beyond 2027?	No. The District Council feel that it would be difficult to provide
We think that a useful way forward would be:	clear/meaningful guidance within this longer time frame. It is felt that
We trink that a decidi way forward wedia be.	an earlier review, in light of any changing circumstance, would be
To project the current RSS calculations forward for 10 years to	more appropriate and therefore the plan should be developed up until
2036 in the light of new evidence and our own monitoring of the	2027.
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	

Reference	WFDC Comment
 allocations had been taken up first or could be shown to be unsuitable or unavailable To reassess all of these in the light of new evidence and our own 	
monitoring of the Strategy at 5-yearly intervals	
Do you agree?	
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	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.
To incorporate the adopted Best Practicable Environmental Option (BPEO) Strategy into the Waste Core Strategy	Explanation of implications of not incorporating the BPEO strategy would be of use and help to understand the options more fully.
General Comment – Hazardous Waste (P19) The document indicates that "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."	Support the approach regarding Hazardous Waste, as outlined within the document.
General Comment – Possible Future Issues (P48)	Under 'Possible Future Issues' The list of important documents to date, located on p.48, reads as follows:
	RSS Phase 3 revision

Reference	WFDC Comment
	River Severn Basin Management Plan
	South Worcestershire Joint Core Strategy
	Bromsgrove Core Strategy
	Redditch Core Strategy
	Longbridge Area Action Plan
	The District Council is concerned that the Wyre Forest Core Strategy
	is not included within this list.
General Comment – Municipal Solid Waste	Concern that there is no approach to deciding on how Municipal Solid
	Waste management facilities could potentially be split throughout the
	County.